

Appendix A

NOTICE OF VIOLATION

Union Electric Company

Docket No. 50-483

As a result of the inspection conducted on June 16-19, 1981, and in accordance with the Interim Enforcement Policy, 45FR66754 (October 7, 1980), the following violations were identified:

1. 10 CFR 50, Appendix B, Criterion XVI, states in part, "Measures shall be established to assure that conditions adverse to quality, such as ... deviations ... and nonconformances are promptly identified and corrected."

The SNUPPS PSAR, Paragraph 17.1.16, states in part, "The SNUPPS utilities have established a corrective action program which determines ... and assures that conditions adverse to quality are promptly identified, reported, corrected and that the corrective action is appropriate and effective."

Contrary to the above, as of June 17, 1981, the licensee's electrical contractor or licensee's test group, as applicable, failed to identify wire No. 1NK21-1, in Battery Charger Panel No. 2NK21/341, which was improperly terminated in that only the edge of the lug was placed under the terminal screw head.

This is a Severity Level V violation (Supplement II).

2. 10 CFR 50, Appendix B, Criterion X, states in part "A program for inspection of activities affecting quality shall be established and executed ... to verify conformance with the documented instructions, procedures, and drawings for accomplishing the activity. Examinations, measurements, or tests of material or products processed shall be performed for each work operation where necessary to assure quality."

The SNUPPS PSAR, Paragraph 17.1.10, states in part, "The SNUPPS utilities quality assurance program has established requirements for control of inspection activities affecting quality to certify conformance with documented instructions, procedures, and drawings."

IEEE Std. 384-1974, Paragraph 5.1.2, states in part, "Exposed Class 1E raceway shall be marked in a distinct permanent manner at intervals not to exceed 15 feet and at points of entry to and exiting from enclosed areas. Class 1E raceways shall be marked prior to the installation of their cables."

Daniel's procedure number WP303, Revision 5, Paragraph 3.31, states in part, "Raceways may have cables installed in them even though they have not been completed. Incomplete raceways, as a minimum, must be marked and properly supported."

Contrary to the above, as of June 19, 1981, there was no documented evidence that cable trays 1C8K54 and 1J1K27 were inspected for seismic requirements (i.e. location and support), for marking per IEEE-384 requirements, or for proper size per the design documents prior to the installation of their cables.

This is a Severity Level V violation (Supplement II).

3. 10 CFR 50, Appendix B, Criterion V, states in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings ... and shall be accomplished in accordance with these instructions, procedures, or drawings."

The SNUPPS PSAR, Paragraph 17.1.5, states in part, "The quality assurance program established by the SNUPPS utilities requires documented instructions, procedures, drawings, or checklists ... These activities shall be accomplished in accordance with the applicable instructions, procedures, drawings or checklists."

ANSI N45.2-1971, Paragraph 11, states in part, "If mandatory inspection hold points, which require witnessing or inspecting by the purchaser's designated representative and beyond which work shall not proceed without the consent of the purchaser's designated representative Such consent shall be documented prior to the continuation of work beyond the designated hold point."

WP-304, Revision 2, Paragraph 3.2, states, "Hold Points, as indicated by an asterisk (*) preceding a paragraph number indicates that the next item of work shall not be started until Electrical Quality Control has completed required inspections per Reference 2.2."

WP-304, Revision 2, Paragraph 4.1.6 which is marked with an asterisk, states in part, "Electrical Quality Control is to be notified prior to start of testing on any safety related cables."

Contrary to the above, of the approximate 100 test records reviewed for the period between 10/4/80 and 5/20/81, only 11 test records indicated that the tests had been witnessed by Quality Control. Consent to work beyond the designated hold point was not documented on the remaining test reports reviewed.

This is a Severity Level IV violation (Supplement II).

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation. Consideration may be given to extending your response time for good cause shown.

JUL 23 1981
Date

C. E. Norelius
C. E. Norelius, Acting Director
Division of Engineering and
Technical Inspection