

APPENDIX A

NOTICE OF VIOLATION

Tennessee Valley Authority
Bellefonte 1 and 2

Docket Nos. 50-438, 50-439
License Nos. CPPR-122, CPPR-123

As a result of the inspection conducted on July 19-23, 1982, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified.

- A. 10 CFR 50, Appendix B, Criterion V, as implemented by FSAR Section 17.1A.5, requires that activities affecting quality be prescribed by documented procedures and accomplished in accordance with those procedures.

Contrary to the above, the preparation of instructions which prescribed certain welding inspections, the performance of the inspections (examinations) in accordance with those instructions, and the control of the inspection records were not accomplished in accordance with the procedural requirements as described below:

1. Sequence control charts (SCCs), as described in procedure QCP 10.36, are instructions which prescribe the desired sequences of installation operations - including inspection operations. Procedure QCP-10.36, Section 6.1.2 requires that sequence control charts (SCC's) involving welding or weld inspection requirements that are not originated by the Welding Engineering Unit (WEU) be reviewed and approved by WEU personnel prior to issue, with the WEU reviewer's initials and the date being entered to signify the approval. SCC's 1NC-M223 and 2NC-M224 (for Bellefonte Nuclear Plant Units 1 and 2), which were originated by the Mechanical Engineering Unit but include welding and welding inspection requirements, were issued without the required WEU approval initials and dating. The subject SCC's provided requirements for installation of the pressurizer surge line.
2. Procedure QCP-10.36, Section 6.1.3, requires that SCC's be reviewed and initialed by group leaders. SCC's 1NC-M223 and 2NC-M224 were issued without QC initials signifying review.
3. Procedure QCP-10.36, Section 6.1.1, requires that SCC operations be performed in numerical sequence. Step 3 of SCC 1NC-M223 (Unit 1) was not performed in the intended sequence indicated and as a result easy access for required examinations on the ground inside diameter of a weld was lost.

4. Procedure QCP-10.7, Section 5.3 requires that weld examination records received by the Quality Control Records Unit (QCRU) be filed such that they are readily retrievable. Reports for penetrant and visual examinations of a ground weld, required by Step 3 of SCC 2NC-M224 (Unit 2), had been completed and transferred to the QCRU but could not be located and replacement reports had to be prepared. The time elapsed between the original examinations and preparation of the replacement reports was over five months.

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

- B. 10 CFR 50, Appendix B, Criterion V, as implemented by FSAR Section 17.1A,5, requires activities affecting quality be accomplished in accordance with prescribed procedures.

Contrary to the above, the licensee did not record a reported deficiency in accordance with their procedure. Procedure QCP-10.26, Section 6.1, requires that deficiencies which render the condition of an item unacceptable or indeterminant be promptly recorded on a Quality Control Investigation Report (QCIR) when reported to engineering personnel. In accordance with QCP-10.26, Section 4.2, the QCIR is used by engineering personnel to document, disposition, and control known or suspected deficiencies. On March 4, 1982, engineering personnel were informed that locking devices on the valve stem guide locking nuts on the Main Steam Isolation Valves were not properly installed. Over four months later, on July 18, 1982, the deficiency still had not been recorded on a QCIR and the condition had not been evaluated or corrected.

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

- C. 10 CFR 50, Appendix B, Criterion XVI, as implemented by FSAR Section 17.1A.16, requires establishment of measures to assure prompt identification and correction of nonconformances. For significant nonconformances it requires that the nonconformance, the cause of the nonconformance, and the corrective action taken be documented.

Contrary to the above, measures established did not assure prompt identification and correction of nonconformances and for significant nonconformances the causes were not documented, as described below:

1. The site procedures (measures) did not provide specific requirements, responsibilities or guidance for performance of evaluations to assure identification of generic nonconformance.
2. The site procedures did not specify responsibilities for documentation of the cause of nonconformance that had been determined to be significant.

3. A significant nonconformance involving welds of unacceptable size and quality on a revolving platform structure was documented on Nonconforming Condition Report (NCR) 1638 on October 27, 1981. No evaluation was made to determine whether the nonconformance was generic. As a result, additional nonconforming welds on other items from the same vendor were not promptly identified. The additional instances of nonconformance were identified and recorded on Quality Control Investigation Report 23178 on July 21, 1982.
4. Cause was not documented for nonconformances that were determined significant and dispositioned on completed NCR's 1638, 1312, 1315, 1350 and 3R1.

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

Pursuant to the provisions of 10 CFR 2.201, you are hereby required to submit to this office within thirty days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged violations; (2) the reasons for the violations if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Date: August 26, 1982