

APPENDIX A

NOTICE OF VIOLATION

Northeast Nuclear Energy Company
Millstone Nuclear Power Station, Unit 3

Docket No. 50-423
License No. CPPR-113

As a result of the inspection conducted July 13-31 and August 3-14, 1981 and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

- A. 10 CFR 50, Appendix B, Criterion V states, in part, that: "Activities affecting quality shall be ... accomplished in accordance with (the prescribed) instructions, procedures, or drawings."

The Northeast Utilities QA Program Topical Report, Section 5.2, states, in part, that: "During construction the contractor programs are required to clearly delineate the actions to be accomplished in the ... control of procedures, instructions and drawings and the methods for complying with 10 CFR 50, Appendix B."

The Stone & Webster specification for electrical installation No. 2400-350 states that electrical cable stored outdoors shall be protected against rain, snow or long exposure to sunlight and that partially used cable reels will be repackaged to prevent weathering of the remaining cable. Also, a cable storage record (Card) shall be maintained for each reel. This card shall show the reel identification, supplier, purchase order number, item number, cable type mark number and length of cable on reel.

The Stone & Webster Material/Equipment construction methods procedure No. 1.3 states that covers when required for out door storage, shall be of flame resistant material, as approved by the safety supervisor.

Contrary to the above, as of July 30, 1981 the following conditions were identified for the maintenance and storage of safety related (Category I) electrical cables:

- Kerite (Manufacturer) reels identified as E-7643, G-3666, H-4195, G-2885, G-3439, H-9228, B-185, B-871 and M-8421 were not adequately protected from exposure to the sunlight and weather
- Cable reels identified as Kerite H-9228 and Anaconda #02689 did not have the required "cable storage card" as specified in the S&W engineering specification E 350

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- Cable reel identified as Kerite B-871 had Anaconda (different manufacturer) cable on the Kerite reel. No traceability to the purchase order or any document was available.
- The covering used to protect cables from the elements was a flammable material (90 lb. roofing tar paper).

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

- B. 10 CFR 50, Appendix B, Criterion V states, in part, that: "Activities affecting quality shall be ... accomplished in accordance with (the prescribed) instructions, procedures, or drawings."

The Northeast Utilities QA Program Topical Report, Section 5.2, states, in part, that: "During construction the contractor programs are required to clearly delineate the actions to be accomplished in the ... control of procedures, instructions and drawings and the methods for complying with 10 CFR 50, Appendix B."

The Stone & Webster weld procedure technique sheets W70J, Revision 1 and W70G Revision 3 state that when the thickness of the weld joint is greater than 1 1/2 inches the required preheat shall be a minimum of 150°F.

Contrary to the above, on August 6, 1981 at two different locations in the containment building the inspector observed the following:

- A welder welding a reactor coolant support in accordance with weld procedure technique sheet W70G and with a material thickness of 2 inches, without the required minimum preheat of 150°F.
- A welder welding a category 1 platform in accordance with weld procedure technique sheet W70J and with a material thickness greater than 1 1/2 inches without the required minimum preheat of 150°F.

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

- C. 10 CFR 50, Appendix B, Criterion VI states, in part, that: "measures shall be established to control the issue of documents, such as instructions, procedures, and drawings, including changes thereto, which prescribe all activities affecting quality."

The northeast utilities QA program topical report, section 6.1, states in part, that "approved locations... and measures are provided for controlling documents to preclude the possibility of the use of outdated documents."

The Stone and Webster QA program manual section 6.1.5, states that the distribution of documents shall be controlled to ensure that only authorized documents are in use at the locations where the prescribed activities are being performed."

Contrary to the above, on August 12, 1981 the inspector observed the following condition during welding of structural steel in the engineered safety features building.

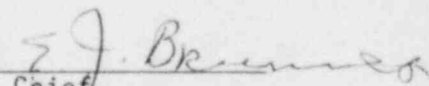
- Two weldors at different locations were welding the containment recirculation cooler supports using an obsolete weld technique sheet #W5S, Revision 0. (Revision 1 to W5S had been issued on 5/1/81 and contained important new welding criteria).

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

Pursuant to the provisions of 10 CFR 2.201, Northeast Nuclear Energy Company is 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) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; 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. Where good cause is shown, consideration will be given to extending your response time.

The responses directed by this Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1989, PL 95-511.

Dated SEP 17 1981

Original Signed By: 

Eldon J. Brunner, Chief
Projects Branch #1, Division of
Resident and Project Inspection