APPENDIX A

NOTICE OF VIOLATION

Washington Public Power Supply System
P. O. Box 1223
Elma, Washington 98541

Docket Nos. 50-508
Construction Permit No.
CPPR-154

As a result of the inspection conducted on August 10-16, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violation was identified.

10 CFR 50, Appendix B, Criterion XI states that "A test program shall be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents."

Paragraph 17.1.11 of the Quality Assurance Program documented in approved PSAR Deviation No. 26-WP, states that: "Construction testing will be performed by the contractors to ensure that installed equipment meets applicable codes, standards, and design requirements".

Contract Specification No. 3240-251/226, page S-8, Revision 5, states, in part, that: "Field welds on pipe sleeves and penetrations shall be tested in accordance with ASME III, Article NC-6000...."

1. The ASME Boiler and Pressure Vessel Code Section III, 1977 Edition including addenda through Summer, 1978, paragraph NC-6111.1 states, in part, that: "All components and appurtenances constructed or installed under the rules of this subsection shall be hydrostatically tested...." Paragraph NC-6111.2 states: "When a hydrostatic test is not practical (NC-6112), a pneumatic test in accordance with NC-6300 may be substituted." Paragraph NC-6321(a) specifies that: "The pneumatic test pressure for components or appurtenances except storage tanks shall not be less than 1.25 times the system design pressure...." Paragraph NC-6315 specifies, in part, that: "Following the application of pressure...examination for leakage in accordance with NC-6215 shall be made."

Contrary to the above, a 7.5 PSIG pneumatic pressure test was performed by the contractor in accordance with procedure No. PKS-WI-306, Revision 3, as approved by Ebasco, on Unit No. 3 containment penetration No. 24 sleeve welds which resulted in Field Weld No. 4 on penetration No. 24 not being tested at 1.25 times the design pressure of 50 PSIG. Field Weld No. 4 is now embedded in concrete which prevents examination of the surface for leakage.

2. Paragraph NC-6112(a) states, in part, that: "Pneumatic tests may be used in lieu of the hydrostatic test required by NC-6111.1... only when the following conditions exist: (1) When components... are so designed or supported that they cannot be safely filled with water. (2) When components...which are not readily dried are to be used in services where traces of the testing medium cannot be tolerated...." Paragraph NC-6215 states, in part, that: "Following application of the hydrostatic test pressure... examination for leakage shall be made of all joints...." Paragraph NC-6221(b) states, in part, that: "All pressure retaining components...shall be subjected to a system hydrostatic test at a pressure not less than 1.25 times the system design pressure".

Contrary to the above, Contact 251 Procedure No. PKS-WI-306, Revision 3, specifies a pneumatic test of the process pipe on penetration Nos. 23, 24, and 44. The process piping in these penetrations has been designed to accommodate the testing medium (water). Closure welds have been completed on penetration Nos. 24 and 44 in Unit 3 rendering the joints inaccessible for examination for leakage. The specified test pressure for penetration No. 44 is 188 PSIG whereas the specified design pressure of the process piping is 200 PSIG which would require a test pressure of 250 PSIG.

Items 1 and 2 represent failures to properly incorporate code requirements into applicable test procedures.

This is a severity Level V violation (Supplement II) applicable to Unit 3.

Pursuant to the provisions of 10 CFR 2.201, Washington Public Power Supply System is hereby required to submit to this office within thirty (30) 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 items of 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.

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 1980, PL 96-511.

dated OCT 21 1981

D. P. Haist

~~G. Hernandez~~, Reactor Inspector

D. P. Haist