

APPENDIX A

NOTICE OF VIOLATION

Washington Public Power Supply System
P. O. Box 968
Richland, Washington 99352

Docket No. 50-460
Construction Permit
No. CPPR-134

As a result of the inspection conducted on April 5-9, 1982 and in accordance with the NRC Enforcement Policy 10 CFR Part 2, Appendix C 47 FR 9937 (March 9, 1982) the following violations were identified:

- A. 10 CFR 50 Appendix B, Criterion XV and Section 17.1.15 of the PSAR state in part: "Measures shall be established to control materials, parts or components which do not conform to requirements in order to prevent their inadvertent use.... These measures shall include, as appropriate, procedures for...documentation, ...disposition, and notification to affected organizations. Nonconforming items shall be reviewed and accepted, rejected, repaired or reworked in accordance with documented procedures."

Contract specification 9779-216 Revision 10 Modification 4 Paragraph A2.2.1.1 defines a nonconformance as "A deficiency in characteristic, documentation or procedure which renders the quality of an item unacceptable or indeterminate. Examples of nonconformance include: physical defects, test failure, incorrect or inadequate documentation, or deviation from prescribed processing, inspection or test procedures."

Paragraph A2.3.1a. further states in part: "Nonconformances detected by a site contractor during...construction activities shall be documented on forms supplied by UE&C (Figure 1)." Figure 1 is the nonconformance report form.

University Nuclear Systems Incorporated (UNSI) Procedure QCP/CP 22.0 Revision 5, paragraph 5.13.1 states "Welded attachments such as those used for alignment, erection, or installation purposes shall be handled with the following provisions:"

Paragraph 5.13.11 further states "The inspector shall be notified of all temporary attachment welds to be made and shall document the locations, WPS and Welder ID on the IPI in accordance with QCP/CP 27.0."

UNSI Quality Finding Report QFR-81-1&4-9 dated July 10, 1981 lists four welded items installed but not documented and states in part that "a random sampling indicates that perhaps 30% of welds at WNP-1 are undocumented." The QFR was closed on October 23, 1981 with no disposition provided for the undocumented Unit 1 Quality Class I welds.

Contrary to the above, a nonconformance report was not written for the inadequate weld documentation and deviation from prescribed inspection procedures for the Unit 1 Quality Class I welds described in QFR 81-184-9 of July 10, 1981 and no disposition for these welds was provided.

This is a Severity Level V violation Supplement II, applicable to Unit 1.

5. 10 CFR 50 Appendix B Criterion V and Section 17.1.5 of the PSAR state in part: "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions procedures or drawings."

University Nuclear Systems Incorporated (UNSI) procedure QCP/CP 22.0 Revision 7 General Welding Standards dated November 11, 1981 paragraph 2.0 states in part: "The purpose of this procedure is to assure compliance with the requirements of...referenced codes and standards." Paragraph 4.2.2 lists "American Welding Society Structural Welding Code AWS D1.1-77" as a referenced code. Paragraph 4.1 states "This procedure is to be used in conjunction with approved UNSI WPS's." A WPS is a Welding Procedure Specification. Paragraph 4.1.1 states in part: "Refer to the applicable WPS for the following: 4.1.1.1 - Base Metal and Specification; 4.1.1.7 - Typical Joint Designs"

AWS D1.1 - Revision 2-77 Paragraph 1.2 states in part: "Steels complying with the specifications listed in 8.2, 9.2 and 10.2...are approved for use with this code. Steels other than those listed may be used provided the provisions of 8.2.3, 9.2.4 and 10.2.3 are complied with." Paragraphs 8.2.3, 9.2.4 and 10.2.3 state in part: "When a steel other than those listed...is proposed for welded construction, ...the procedure for welding it shall be established by qualification...." Paragraph 2.6.1 of the Code states in part: "Joints meeting the following requirements are designated as prequalified...conformance with the details specified in 2.7-2.14 and 10.13...joints meeting these requirements may be used without performing the joint welding procedure qualification tests."

- (1) Contrary to the above, the following WPS's for Quality Class I welds listed materials which are not listed in 8.2, 9.2 and 10.2 of the Code and have not been established by qualification:

- . WPS 100 Rev. 3 dated December 31, 1980 lists ASTM A 283 GrC, and AISI 1012-1028
- . WPS 101 Rev. 0 dated January 16, 1981 lists ASTM A 283 GrC and AISI 1025-1028
- . WPS 125 Rev. 4 dated February 5, 1982 lists ASTM A 283 GrC
- . WPS 126 Rev. 2 dated July 15, 1981 lists ASTM A 283 GrC

- (2) Contrary to the above, WPS-100 Revision 3 dated December 31, 1980 specifies the following welded joint details for Quality Class I welds which are not in conformance with the details specified in section 2.7-2.14 and 10.13 of the Code and have not been established by qualification:

- . AWS and WPS Joint designation B-Pla-root opening of 0-1/8" vs Code required 0-1/16"
- . AWS and WPS Joint designation B-Pla-weld reinforcement not specified vs Code required 1/32-1/8"
- . AWS and WPS Joint designation BL1b-root opening of 0-1/16" vs Code required 1/2 T-1/2 T + 1/16".
- . AWS and WPS Joint designation BU4a-root opening of 0-3/32" vs Code required 1/4 - 5/16".
- . AWS and WPS Joint designation B-U2a-groove angle 60°-70° vs Code required 45°-55°.

- (3) Contrary to the above, the following WPS's for Quality Class I welds as prequalified weld joint configurations whereas flare groove weld configuration details are not specified in 2.7-2.14 and 10.13 of the Code.

- . WPS-100 Rev. 3 dated December 31, 1980
- . WPS-101 Rev. 0 dated January 16, 1981
- . WPS-125 Rev. 4 dated February 5, 1982
- . WPS-126 Rev. 2 dated July 15, 1981

This is a Severity Level V Violation, Supplement II applicable to Unit 1.

Pursuant to the provisions of 10 CFR 2.201, Washington Public Power Supply System 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 items of noncompliance; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

dated MAY 3 1982

ORIGINAL SIGNED BY
R. T. DODDS

P. P. Narbut, Reactor Inspector