

Appendix A

NOTICE OF VIOLATION

Based on results of the W.C investigation conducted on September 11-14, 1978, it appears that certain of your activities were not conducted in full compliance with Appendix B to 10 CFR 50 as indicated below:

A. Failure to Follow Cadweld Procedure

Criterion V of Appendix B requires that established instructions, procedures, or drawings be followed for all activities affecting quality.

Brown and Root Quality Construction Procedure No. A040KPCCP-11 requires that Cadweld rebar splices be fabricated in accordance with procedures specified in the Erico Products, Inc., manual entitled, "Cadweld Rebar Splicing," 1974.

Contrary to the above:

On September 12, 1978, during the second shift, it was observed by the IE inspectors that the Cadweld procedures specified in the Erico Products, Inc., manual were not being followed. Observed examples of failure to follow the Cadweld procedures are identified below:

1. Cadweld 54V47, located in the Unit 1 containment wall, was observed to have a piece of wire forced into the annular area between the rebar and sleeve such that it concealed a rejectable void. This practice is not included in the Cadweld procedure and could interfere with detection of the rejectable void.
2. Cadweld 54V49, also located in the Unit 1 containment wall, was observed to have been fabricated without centering (witness) marks having been scribed on the rebar before firing. Step 1 of the Cadweld procedure for vertical splicing requires these marks be made before firing to permit subsequent inspection.
3. Packing was improperly wrapped by Cadwelders 33 and 54 around the top of vertical Cadweld sleeves and tie-wire was used instead of prescribed end alignment clamps to retain the wrap. (An additional example involving Cadwelder 39 was noted on September 13.) Step 5 of the Cadweld procedure for vertical splicing defines a single wrap of packing instead of the two or three wraps observed and specifies use of the end alignment clamp.

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4. A butane torch was used to fire Cadweld 54V50 instead of the Flint Gun identified in step 8 of the Cadweld procedure for vertical splicing.

This is an infraction.

B. Failure to Provide Specified In-Process Inspection

Criterion X of Appendix B requires that a program for inspection of activities affecting quality be established and executed to verify conformance with instructions, procedures, and drawings.

Brown and Root Quality Construction Procedure A040KPCCP-11 specifies the requirement for surveillance of Cadwelding activities. Appendix A to this procedure defines a daily frequency for in-process Cadweld surveillance inspections.

Contrary to the above:

On September 12, 1978, the IE inspectors observed that no Quality Control Inspectors were assigned to perform in-process inspection of Cadweld splices being made on the second shift. Review of records for the period August 1 to September 10, 1978, and interviews with Brown & Root inspection personnel revealed that the requirement for daily surveillance inspections of in-process Cadweld activities had not been routinely satisfied for the second shift during this period.

This is an infraction.