

APPENDIX A

NOTICE OF VIOLATION

Gulf States Utilities
River Bend, Unit 1

Docket 50-458/82-03
CPPR-145

Based on the results of an NRC inspection conducted during the period of late February, March, April, and early May 1982 and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 47 FR 9987, dated March 9, 1982, the following violations were identified.

A. Failure to Take Adequate and Prompt Corrective Action Regarding Reporting of Significant Construction Deficiencies

Criterion XVI of Appendix B to 10 CFR 50 requires that conditions adverse to quality, such as deviations, defective material, defective equipment, and nonconformances be promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the condition is determined and corrective action taken to preclude repetition.

10 CFR 50.55(e)(2) requires that the holder of a construction permit notify the appropriate NRC regional office of each reportable deficiency within 24 hours.

Stone and Webster Quality Standard 16.2, Revision A, "Notifying Clients of Potentially Reportable Deficiencies Under 10 CFR 50.55(e), establishes . . . a system for the identification and review of deficiencies to ensure that the client is notified of all deficiencies identified by Stone and Webster that may be reportable to the NRC."

Contrary to the above, on April 22, 1982, the NRC inspector discovered that on February 28, 1982, an early notification was initiated in accordance with Stone and Webster Quality Standard 16.2 that identified a failure to comply with Project Specification 228.160 and Weld Process Procedure W-3. This problem, however, was reviewed in accordance with the Construction Management Manual, Section 4.10, and was found not to be reportable in the context of 10 CFR 50.55(e) requirements on March 12, 1982. However, 10 of 12 radiographs were rejected (documentation dated March 18, 1982), and the results of this evaluation were not available to the licensee until on or about April 20, 1982, when this matter was reported to the NRC Region IV Office as a "potentially reportable" deficiency by the licensee.

On April 29, 1982, it was discovered by the NRC inspector that the High Pressure Core Spray Stationary Batteries were damaged due to lack of maintenance. A Nonconformance and Disposition Report (N&D 2010) was initiated in late December 1981, but was not dispositioned at

the time of this inspection. The NRC inspector was informed that no cognizant individual within the licensee's organization responsible for evaluation to reportability requirements was aware of the damaged batteries.

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

B. Inadequate Procedural Requirements to Ensure Adequate Storage and Maintenance of Safety-Related Equipment

Criterion V of Appendix B to 10 CFR 50 requires activities affecting quality to be prescribed by appropriate procedures.

Stone and Webster Specification 229.170, "Storage and Maintenance," states that "it consolidates the requirements of purchase specifications, installation and erection specification, vendor documents, . . . and other requirements from receipt through preliminary testing." It also requires Field Quality Control (FQC) to execute a program which incorporates all of the requirements of the specification.

Contrary to the above, from an evaluation of the specification requirements, it was determined that Specification 229.170 does not meet the stated requirements throughout the scope specified, and cannot be considered appropriate to accomplish activities affecting quality. Additionally, the specification requirements that are imposed, lead to a large number of deficiencies that are identified by Field Quality Control, but do not consider the safety significance of the inspection activity being performed.

Specific examples are as follows:

- (1) The maintenance requirement for the High Pressure Core Spray Stationary Batteries was not incorporated in the specification until after the batteries were damaged by a lack of maintenance, even though the batteries were in the warehouse approximately one year and manufacturer's instructions were available onsite.
- (2) The High Pressure Core Spray Diesel Engine maintenance consists of a quality visual inspection and annual spraying of a preservative, while the manufacturer's instruction book contains considerable storage and inservice maintenance requirements.
- (3) Stone and Webster Type C Inspection Report, X1000410, dated July 17, 1981, identified numerous deficiencies involving visual inspections that resulted in the generation of four more unsatisfactory inspection reports. However, these extensive inspections

failed to identify more significant deficiencies such as damage to batteries due to lack of maintenance, nitrogen blanket pressure not properly maintained (N&D 2362), and failure to energize heaters in electrical equipment (NRC Inspection Reports 50-458/80-04 and 81-09)

Pursuant to the provision of 10 CFR 2.201, Gulf States Utilities is hereby required to submit to this office, within 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 violations; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Dated July 8, 1982