

Appendix

NOTICE OF VIOLATION

The Detroit Edison Company

Docket No. 50-341

As a result of the inspection conducted on June 21 to July 2, 1982, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified:

1. 10 CFR 50, Appendix B, Criterion II, states, in part, "The applicant shall establish...a quality assurance program which...shall identify ...the major organizations participating in the program, together with the designated functions of these organizations... Activities affecting quality shall be accomplished under suitably controlled conditions...such as adequate cleanness... The applicant shall regularly review the status and adequacy of the quality assurance program."

The Detroit Edison Quality Assurance Manual requires, in Section 2, a description of the organizational structure, responsibilities, duties and authorities of persons and organizations performing quality related activities; in Section 1, that activities affecting quality be performed under suitably controlled conditions; and, in Section 19, that higher management levels periodically assess the status and adequacy of the program.

Contrary to the above:

- a. The licensee failed to revise the Quality Assurance Manual to reflect the current Fermi Project organization. A major revision to the organization took place in March 1980 but the QA Manual was not revised. This lack of action had existed for over 27 months.
- b. The licensee failed to maintain good housekeeping practices in that the site grounds and safety related structures were observed to be littered with trash and debris. The basic housekeeping requirements of ANSI N45.2.3 and Regulatory Guide 1.39 were not being complied with. In particular, debris such as empty cable reels, combustible materials, and construction materials were observed in electrical cable trays in the reactor building.

- c. The licensee has not performed a documented management assessment of the overall program since inception of the Fermi Project. In addition, a procedure for such an assessment does not exist.

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

2. 10 CFR 50, Appendix B, Criterion III, states, in part, "...design control measures shall provide for verifying or checking the adequacy of design... Design changes...shall be subject to design control measures commensurate with those applied to the original design..."

The Detroit Edison Quality Assurance Manual, in QA Procedure QAP 4, Revision 5, Section 4.1.3.3, states in part, "The dispositioning of Type I changes...shall be by those who approved the original design... The evaluation and disposition shall be subject to the same requirements for control and documentation as specified in the design control procedures."

Contrary to the above, on June 24 and 25, 1982, the inspector found that field modifications which involved replacing motor connection boxes with larger connection boxes, and installing a site-fabricated cable support rack on top of a safety-related cabinet, had not been reviewed with regard to the effects on seismic qualifications of the motors or the cabinet.

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

3. 10 CFR 50, Appendix B, Criterion V, states in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings...and shall be accomplished in accordance with these instructions, procedures, or drawings."

The Detroit Edison Quality Assurance Manual, Section 9.0.1, states that "Activities affecting quality shall be prescribed by appropriate written instructions, procedures, or drawings and shall be accomplished in accordance with these documents."

Contrary to the above, the inspectors found that:

- a. Licensee Procedure PQAP 9.112, Revision 0, does not include a requirement, per Regulatory Guide 1.146/ANSI N45.2.23, that Lead Auditors be administered an examination prior to certification. In addition, Lead Auditor certifications were issued without the required verifying documentation.

- b. Wismer and Becker Procedure WB-Q-113, Revision 5, does not provide adequate instructions with regard to the scope of the surveillance program, the methods by which surveillances are to be conducted, or the acceptance criteria to be used.
- c. Project Procedures 3.20, 3.21, and 3.22 contain significant mistakes and inconsistencies, including incorrect references, an incorrect title, and incorrect instructions.

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

- 4. 10 CFR 50, Appendix B, Criterion IX, states, in part, that "Measures shall be established to assure that special processes, including welding...are controlled; and...accomplished...in accordance with applicable...specifications, criteria, and other special requirements."

Reactor Controls Incorporated Procedure No. WP-121A, Revision 2, Electrode Control Procedure, in Section 5.5, states that all welding electrode, when not in use, shall be stored in locked ovens or containers, and that stainless steel electrode shall not be stored or issued in ovens or containers with other classifications of electrode.

Contrary to the above, on June 28, 1982, during an examination of RCI storage and issuance of welding materials, the inspector noted that fifty 1/8" E7018 carbon steel electrodes were mixed with 1/8" stainless steel E308L-16 electrodes in the No. 2 holding oven.

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

- 5. 10 CFR 50, Appendix B, Criterion X, states in part "A program for inspection of activities affecting quality shall be established and executed by or for the organization performing the activity to verify conformance with the documented instructions, procedures, and drawings for accomplishing the activity."

The Detroit Edison Company Quality Assurance Manual, Section 11, states, in part, "A program for inspection of activities affecting quality shall be established and executed to verify conformance to the documented instructions, procedures, and drawings prescribing a given activity.

Contrary to the above, the licensee failed to inspect, or document the inspection of, cable tray to hanger support welds made since August 1978, per the requirements of Drawing DECO-STD-EB-117-57.

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

6. 10 CFR 50, Appendix B, Criteria XII, states, "Measures shall be established to assure that tools, gauges, instruments, and other measuring and testing devices used in activities affecting quality are properly controlled, calibrated, and adjusted at specified periods to maintain accuracy within necessary limits."

Walbridge, Aldinger Company (WACO) Procedure No. WM-IV, Revision 7, Section 5.3.3.1, requires that temperatures of electrode storage ovens be verified in accordance with AWS D1.1-75, Section 4.92, on a weekly basis, and that the actual temperatures be recorded on a temperature log. Project Quality Assurance Procedure No. PQAP 9.150, Revision 3, Section 4.1.2, requires that each item of measuring and test equipment requiring calibration be calibrated, and that the calibration be traceable to the NBS Standards, ASTM Standards, or manufacturer's requirements.

Contrary to the above, on June 30, 1982, during an examination of the WACO weld materials storage and issue control at the structural steel fabrication shop and the issue station in Building 49, the inspector noted that the thermometers used to check ovens No. 2 and No. 5 were not in the calibration program, were not traceable to any standard, and were not identified with a sticker or tag.

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

7. 10 CFR 50, Appendix B, Criteria XV states, Measures shall be established to control materials, parts, or components which do not conform to requirements in order to prevent their inadvertent use or installation. These measures shall include...procedures for identification, documentation, segregation, disposition, and notification to affected organizations.

The Detroit Edison Quality Assurance Manual, Section 16.1.5, states, "Reports of nonconforming items shall be made on Deviation Disposition Request (DDR) forms to Project Engineering for dispositioning in accordance with Configuration Control Procedures."

Contrary to the above:

- a. During a review of surveillance reports, the inspector found five cases in which a site contractor, Wismer and Becker, improperly reported nonconformances affecting plant hardware on surveillance reports rather than on DDR's, thereby avoiding the required licensee engineering review of the nonconformances.

- b. During a review of vendor documentation for the RPV Head Insulation Support Framing, the inspector found that no action had been taken on DDR No. N6116-1, which had been submitted for disposition, although the equipment and related documentation had been reviewed and accepted on site.

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

8. 10 CFR 50, Appendix B, Criterion XVI, states, in part, "Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and non-conformances are promptly identified and corrected."

The Detroit Edison Quality Assurance Manual, Section 17, states, in part, "QA, QC and test personnel shall promptly identify and report conditions adverse to quality, such as failures, malfunctions, deficiencies, nonconformances, defective material and equipment, and procedural nonconformances. In the event of significant conditions adverse to quality Edison's QA shall assure...prompt corrective action is taken..."

Contrary to the above the inspector found that numerous DDR's, Audit Findings, and Surveillance Reports have not been dispositioned on a timely basis and that, therefore, corrective actions have not been prompt. Trend analysis reports have identified these problems to licensee management; however, effective corrective action has not been taken.

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

9. 10 CFR 50, Appendix B, Criterion XVIII, states, in part, "A comprehensive system of planned and periodic audits shall be carried out to verify compliance with all aspects of the quality assurance program and to determine the effectiveness of the program."

Detroit Edison's Quality Assurance Manual, Section 19, states, in part, "A comprehensive system of planned and periodic audits shall be carried out to verify compliance with all aspects of the QA Program and assess the effectiveness of the program."

Contrary to the above, the Licensee failed to schedule or conduct audits of the Fermi site audit program or the Troy Architect-Engineer audit program. Audits in these areas of the QA Program have not been done since the Fermi Project began.

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

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

August 20, 1982
Dated

W.S. Ritts 15/5
C. E. Norelius, Director
Division of Engineering and
Technical Programs