

APPENDIX A

NOTICE OF VIOLATION

Gulf States Utilities
River Bend Station

Docket No. 50-458
License No. NPF-47

During an NRC inspection conducted on October 1-5, 1990, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1990), the violation is listed below:

Criterion IX of Appendix B to 10 CFR 50 states, in part, "Measures shall be established to assure that special processes, including welding, . . . are controlled and accomplished by qualified personnel using qualified procedures in accordance with applicable codes, standards, specifications, criteria, and other special requirements." In the following examples, this did not occur.

1. Section 5.1 of the AWS D1.1 Structural Welding Code exempts from qualification testing (and designates as prequalified) those welding procedures which conform to all of the provisions of the Code including utilization of the specific weld joint designs detailed in Section 2. All other welding procedures are required by Section 5.2 of the Code to be qualified prior to use.

Contrary to the above, WPS-W1.1-01, which was designated as an AWS D1.1 prequalified welding procedure, was utilized in an application where the weld joint details did not conform to the requirements of Section 2 of the Code. Specifically, the joint configuration used for welding the flange to outer plate on a modification to the diesel generator tornado damper separator (Modification Request 86-1389) did not conform to the Section 2 prequalified joint details for included angle, thereby invalidating the procedure as prequalified. It was also determined that general welding Procedure SPP-7002, Revision 1, which was referenced in WPS-W1.1-01 for joint fitup tolerances was inconsistent with the requirements of Section 2 of the Code; for example, the allowable root opening for Joint A-TC-V4a in SPP-8-7002 exceeded that permitted by the Code for a prequalified joint.

2. Paragraph 6.8.5 of Procedure QCI-3.15, "Visual Welding Inspection ASME, ANSI B31.1," Revision 2, requires that Quality Control verify, on a random basis, the in-process welding for proper technique, cleaning between passes, appearance of individual welding beads, sequence of welding, and use of correct voltage and amperage.

Contrary to the above, Quality Control was neither scheduling nor performing random verifications of in-process welding to ensure that welding conformed to procedural requirements.

This is a Severity Level IV violation (Supplement II) (458/9027-01).

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Pursuant to the provisions of 10 CFR 2.201, Gulf States Utilities is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region IV, and if applicable, a copy to the NRC Resident Inspector, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time. Under the authority of Section 182 of the Act, 42 U.S.C. 2232, this response shall be submitted under oath or affirmation.

Dated at Arlington, Texas
this 25th day of *October* 1990