

APPENDIX A

NOTICE OF VIOLATION

Washington Public Power Supply System
P. O. Box 1223
Elma, Washington 98541

Docket No. 50-508
Construction Permit No. CPPR-154

As a result of inspections conducted on August 2-6, and August 30 - September 3, 1982 and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified:

- A. 10 CFR 50, Appendix B, Criterion III states, in part, that: "Measures shall be established to assure that applicable regulatory requirements and the design basis...are correctly translated into specifications, drawings, procedures, and instructions."

Section 17.1.3 of the Quality Assurance Program as documented in approved PSAR Deviation No. 26-WP, states: "The procurement documents specify that the contractors and vendors of Supply System Quality Class I items and activities develop and implement design and interface control procedures which assure: Translation of regulatory requirements and design bases correctly into design documents."

Contract specification no. 3240-224, paragraph 3.1.4.3 states that "The penetration assemblies shall be installed, inspected and tested in accordance with ASME Boiler and Pressure Vessel Code, Section III, Subsection NE for Class MC Components.... Penetration-to-containment nozzle joints shall be of a full penetration groove weld configuration and shall be inspected in accordance with ASME Section III, Paragraph NE5200."

The applicable ASME Boiler and Pressure Vessel Code Section III, 1977 Edition including addenda through Summer, 1978, paragraph NE 6111 requires all vessels constructed under the rules of Subsection NE to be pressure tested in accordance with the rules of paragraph Nos. NE 6200 or NE 6300. The rules of NE 6300 require a pneumatic pressure test and examination of all joints for leakage during the application of pressure.

Paragraph NE 5211.2 provides for waiver of the pneumatic test on inaccessible welds (defined as not having access to the weld from the outside of the vessel for visual examination) provided, inter alia, that the welds are double butt welded, fully radiographed, and leak tested using a gas medium test.

Contrary to the above requirements: (1) Containment electrical penetration Nos. 102, 104 and 106 were designed and installed without provisions for visual examination during a pneumatic pressure test; (2) the field weld joints were not designed to utilize the provisions of NE 5211.2.

The welds are single butt welds and no provisions were made for gas medium testing; and (3) the penetrations were installed and inspected in accordance with contractor procedure Nos. FCP-1053 and FQI-10.23 which did not include provisions for performing the code required pneumatic pressure test.

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

- B. 10 CFR 50 Appendix B, Criterion III, states, in part, that: "Design changes, including field changes, shall be subject to design control measures commensurate with those applied to the original design and be approved by the organization that performed the original design...."

Section 17.1.3 of the Quality Assurance Program as documented in approved PSAR Deviation No. 26-WP, states that "Design changes, including field changes, are subject to design control measures commensurate with those applied to the original design and are approved by the organization that performed the original design."

Contrary to the above, quick fix project change proposal No. QFPCP-35Q-06723 was issued by Ebasco Engineering on March 1, 1982 to provide alternate beam connection details for nuclear safety related structural steel. The approved change was provided directly to the field erection contractor and required the contractor to perform design activities and procure alternate beam clips which were later installed. This design change was not forwarded to the original contractor responsible for the design and fabrication of the structural steel (Chicago Bridge and Iron) for subsequent approval, design verification and appropriate drawing changes. As a result, these connection details have not been reviewed by the contractor who performed the original design and do not conform to the detailed structural steel drawings.

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

- C. 10 CFR 50 Appendix B, Criterion III states, in part, that: "Measures shall be established to assure that applicable regulatory requirements and the design basis...are correctly translated into specifications.... These measures shall include provisions to assure that appropriate quality standards are specified and included in design documents and that deviations from such standards are controlled."

Section 17.1.3 of the Quality Assurance Program as documented in approved PSAR Deviation No. 26-WP, states that: "Design changes, including field changes, are subject to design control measures commensurate with those applied to the original design and are approved by the organization that performed the original design."

Ebasco Project Site Procedure No. RE-2-36, Rev. 1, "Initiation and Processing of Project Change Proposals," attachment 5, specifies that changes affecting nuclear safety related specifications require approval

by the Ebasco Site Support Engineering (ESSE) lead discipline engineer and the quality assurance site manager.

Contrary to the above, a requirement for "actual" certified test reports for weld filler metal in Ebasco Contract No. 3240-448 (J. A. Jones, Contract No. 265), structural steel framing was changed by Project Change Proposal Nos. RFI-265-899 (November 24, 1981) and RFI-265-916 (January 14, 1982) to allow the purchase of filler metal with "typical" certified test reports without the change being approved by the ESSE lead discipline engineer and the quality assurance site manager. Subsequently, the contractor purchased and used weld filler metal having typical certifications in safety related structures.

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

- D. 10 CFR 50, Appendix B, Criterion V states, in part that: "Activities affecting quality shall be...accomplished in accordance with...procedures"

Paragraph 17.1.5 of the Quality Assurance Program as documented in approved PSAR Deviation No. 26-WP, states, in part, that "Contractors and vendors...are required to have written...procedures...which govern their quality related activities...."

J. A. Jones Project Operating Procedure No. POP-N-712, Rev. 2 "Inspection of Incoming Material," paragraph 6.4 requires inspection of purchased items in accordance with a receiving inspection checklist and the quality assurance inspection record copy of the purchase order. Paragraph 6.5 requires the receiving inspector to verify acceptance of all items on the receiving inspection report. Purchase order No. 01-449-P-1125 requires a certified letter of compliance which references the material specification and type and states that supplied material complies with all the requirements of the purchase order.

Contrary to the above, 50 lbs. of 5/32-inch, E10018-D2 weld filler material of heat No. 27121-4565 was received under purchase order No. 01-449-P-1125 and issued for use on safety related structures without typical mill test reports, and with a certificate of conformance from an intermediate supplier which did not reference the heat or identification number of the material being certified. The receiving inspection checklist was completed on March 19, 1982 and indicated receipt of typical mill test reports and certificates of compliance for the materials supplied under purchase order No. 01-449-P-1125.

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

- E. 10 CFR 50, Appendix B, Criterion 10 states, in part, that: "A program for inspection of activities affecting quality shall be...executed ...to verify conformance with the documented instructions, procedures, and drawings for accomplishing the activity."

Section 17.1.10 of the Quality Assurance Program as documented in approved PSAR Deviation No. 26-WP, states, in part, that: "The procurement documents specify that inspection activities will be performed...in accordance with written procedures, instructions and/or checklists."

J. A. Jones Procedure No. WE-WP-4, Rev. 6, Paragraph 10.1.4.5(e) states, in part, that "Upon inspection of...bolts, nuts, and washers for type, number and condition (as installed) per Attachment E, the inspector shall indicate his acceptance.... Verification of bolt, nut and washer type, number and condition shall be by examination of all exposed surfaces in the as-installed position."

Contrary to the above, structural steel connection no. 535 was inspected and accepted on June 21, 1982 and again on July 16, 1982. At the time of the inspection, the connection contained a nut which did not exhibit markings identifying it as a high strength nut in accordance with ASTM, A-225, "High-Strength Bolts for Structural Steel Joints including Suitable Nuts and Plain Hardened Washers." Also, one of the bolt heads in the same connection contained an unacceptable manufacturing defect known as a "forging burst."

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

- F. 10 CFR 50, Appendix B, Criterion V states, in part, that: "Activities affecting quality shall be...accomplished in accordance with...procedures" A required quality affecting activity is defined by Criterion XIII of Appendix B which states, in part, that: "Measures shall be established to control the...storage...of material and equipment in accordance with work and inspection instructions to prevent damage or deterioration."

Section 17.1.13 of the Quality Assurance Program as documented in approved PSAR Deviation No. 26-WP states, in part, that: "Items delivered to the site are stored, handled, and preserved in accordance with procurement documents and equipment manufacturer's requirements. These functions are performed in accordance with approved procedures and instructions on a scheduled basis and corrective action is taken when required."

Peter Kiewit Sons, Inc., Care and Maintenance Instruction No. PKS-WI-D-118 Rev. 4, Paragraph 2.1 requires construction of a fire-resistant, weathertight, well-ventilated, temperature controlled protective covering supported by a wooden frame to protect the emergency diesel generators until the respective area can provide the necessary protection.

Contrary to the above, on August 2, 1982, rain water was dripping onto diesel generator A-SA. Various portions of the diesel generator, including the diesel to generator coupling and electrical panels associated with the diesel generator, were wet. This diesel generator was placed in its final location prior to July 12, 1982. The floor slab above the diesel generator

had not been placed, nor had a protective enclosure been constructed over the diesel generator.

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

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.

OCT 22 1982

ORIGINAL SIGNED BY:
R. T. DODDS

Date

R. T. Dodds, Chief
Reactor Projects Section 1