

APPENDIX A

NOTICE OF VIOLATION

Public Service Electric and Gas Company
Hope Creek Generating Station, Unit 1

Docket/License: 50-354/CPPR-120

During inspection on September 9 - October 3, 1982, and in accordance with the NRC Enforcement Policy, 10 CFR 2 Appendix C (47FR9987, March 9, 1982), the following violations were identified:

- I. 10 CFR 50, Appendix B, Criterion X states that inspection of activities affecting quality shall be executed to verify conformance with the governing documents. This is implemented by paragraph 4.1.2.1 of PSE&G Quality Assurance Instruction 10-1 which states that Bechtel must provide inspection of work done by their own departments.

Paragraph 7.1.1 of Section III of the Bechtel Construction Quality Control Manual states that construction installation activities including modifications and repair are to be inspected to assure conformance with program criteria.

Section V-10 of the Bechtel Nuclear Quality Assurance Manual requires that a Management Corrective Action Report (MCAR) be issued for each deficiency reportable in accordance with 10 CFR 50.55(e). The MCAR requires that the corrective action taken to correct the deficiency be verified.

Contrary to the above, as of September 30, 1982, Varglass tie wraps had not been completely replaced by Tefzel tie wraps as stated in a 10 CFR 50.55(e) report dated May 21, 1982 and documented in MCAR 26. The replacement activity had been final inspected and accepted by QC and MCAR 26 closed out by Bechtel QA.

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

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

Bechtel Specific Work Plan/Procedure SWP/P-19, Rev. 9, Field Welding Activities, requires that very specific steps be followed to control onsite welding activities.

Contrary to the above, as of September 30, 1982, the requirements of SWP/P-19 were not being followed for welding activities on ASME III Class 2 Main Steam expansion joint 1-XJN-1B, in that a Weld Request had not been initiated to identify to QC and Field Welding Engineering that welding was in progress, a Quality Control Inspection Report had not been issued to control the welding and NDE activities, and weld filler metal was issued without proper authorization.

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

Pursuant to the provisions of 10 CFR 2.201, Public Service Electric and Gas Company 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 violations; and, (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending your response time.