

Appendix

NOTICE OF VIOLATION

Illinois Power Company

Docket No. 50-461

As a result of the inspection conducted on September 27-30 and October 5-8, 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 I, states in part, "The authority and duties of persons and organizations performing activities affecting the safety-related functions of structures, systems, and components shall be clearly established and delineated in writing."

The licensee's Quality Assurance Manual, dated June 28, 1982, Section I.B, states in part, "The IP and contractors' organizations shall meet the following requirements: 1. The authority and responsibility of persons and organizations performing activities which affect quality, including the quality assurance personnel, shall be clearly established and delineated in writing."

Contrary to the above, the Baldwin Associates Quality Assurance Manual did not describe the Quality Assurance Organization that is presently being implemented.

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

2. 10 CFR, Appendix B, Criterion V, states in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

The licensee's Quality Assurance Manual, dated June 28, 1982, Section 5.B, states in part, "Written procedures, instructions, and drawings shall be developed and used, as appropriate, for activities affecting quality."

Contrary to the above:

- a. Nine instances were identified in which Baldwin Associates (BA) Quality Control Inspector qualification records did not contain visual examination results. This is contrary to the BA Quality Control Training Qualification Manual.
- b. Five instances were identified in which BA Quality Control inspector certification records did not contain examination results. This is contrary to the BA Quality Control Training Qualification Manual.

- c. Two instances were identified in which BA Quality Control inspector qualification records did not contain certification forms for Level III personnel. This is contrary to the BA Quality Control Training Qualification Manual.
- d. Two instances were identified in which BA certified Quality Control personnel as Level III inspectors for the duration of employment rather than a three year period. This is contrary to the BA Quality Control Training Qualification Manual.
- e. Three instances were identified in which BA Quality Control inspector qualification records did not contain a waiver letter when it was used as a basis for certification. This is contrary to the BA Quality Control Training Qualification Manual.
- f. Two instances were identified in which BA Quality Control inspector qualification records contained waiver letters that were dated after the date of certification. This is contrary to the BA Quality Control Training Qualification Manual.
- g. One instance was identified in which a BA Technical Services inspector had not been recertified at the specified three year interval. This is contrary to BA Technical Services Procedure BTS 307.
- h. Three instances were identified in which BA Technical Services personnel were initially certified without meeting the minimum certification requirements and whose waivers were dated significantly later. This is contrary to the BA Technical Services Procedure BTS 411.
- i. One instance was identified in which the Zack Company certified a QC inspector who did not meet the minimum qualification requirements of its procedure CB-FQCP-11, Revision 3.
- j. The BA Technical Services Training Manual was not reviewed at least annually by the Manager of Technical Services or his designee. This is contrary to BA Technical Services Procedure BTS 411.
- k. Ten instances were identified in which UST certified QC inspection personnel prior to completing a proficiency evaluation. This is contrary to UST Procedure UST-TQ-1.
- l. Seventeen instances were identified in which UST QC inspectors qualification records contained no evidence of indoctrination and training in accordance with either Illinois Power Company (IPCo) Procedure QAI-310.01 or QAI-710.01.

- m. One instance was identified in which UST certified a QC inspector who did not meet the minimum qualification requirements of its procedure UST-TQ-1.
- n. One instance was identified in which a visual weld inspection was performed by UST QC inspectors not certified to perform visual inspections. This is contrary to IPCo procedures QAI-310.01 and QAI-710.01, and UST Procedure UST (CL) - QAP-1.

This is a Severity Level IV 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.

NOV 23 1982

"Original Signed by C.E. Norelius"

Dated

C. E. Norelius, Director
Division of Engineering
Technical Programs