

APPENDIX A

NOTICE OF VIOLATION

Texas Utilities Generating Company  
Comanche Peak Steam Electric Station

Dockets: 50-445/446  
Permits: CPPR-126  
CPPR-127

Based on the results of an NRC inspection conducted during the period of November 22-24, 1982, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 47 FR 9987, dated March 9, 1982, the following violations were identified:

A. Certification of Inspectors

10 CFR Part 50, Appendix B, Criterion XVII, states, in part, "Sufficient records shall be maintained . . . . The records shall . . . include . . . qualification of personnel . . . ."

Section 17.1.17, "Quality Assurance Records" of the QA Program for design and construction contained in the FSAR Amendment 25, dated August 7, 1981, states, in part, ". . . records that are required to be maintained . . . include . . . personnel certification . . . ."

Section 3.2 of Procedure CQP-YC-4, "Guidelines for Certifying Vendor Compliance Inspection Personnel," states, "Certifications are valid for 3 years. The certification expiration date will be stated on the certification."

Contrary to the above, a review of QA training records for eight inspectors revealed the following:

1. The Level III inspector was not recertified until July 13, 1982, following certification to SNT-TC-1A on July 28, 1977.
2. The certification expiration date was missing from the records for all inspectors.

This is a Severity Level V Violation. (Supplement VII)

B. Audits

10 CFR Part 50, Appendix B, Criterion XVIII, states, in part, "The audits shall be performed in accordance with . . . checklists . . . . Followup action, including reaudit of deficient areas, shall be taken . . . ."

Section 17.1.18, "Audits" of the QA program for design and construction contained in the FSAR, Amendment 29, dated December 21, 1981, states, in part, ". . . TUGCO QA: 3. Provides auditing checklists . . . . 8. Requires reauditing of deficient areas . . . ."

Section 4.2.1 of ANSI N45.2.12, "Requirements for Auditing Quality Assurance Programs for Nuclear Power Plants," Draft 3, Revision 0, states, "An individual audit plan describing the audit to be performed shall be developed and documented." Section 4.3.2.1 states, in part, "Checklists . . . shall be used to ensure depth and continuity of audits." Section 5.2 states, in part, "Records shall be generated and retained for all audits. Records shall include . . . audit plans . . ."

Section 19 of ANSI N45.2-1971, "Quality Assurance Program Requirements for Nuclear Power Plants" states, in part, "Deficient areas shall be re-audited until corrections have been accomplished."

Contrary to the above, a review of the QA records for nine audits relating to NPS Industries revealed the following:

1. Audit plans were missing for four audits conducted in October 1978, May 1979, July 1980, and November 1980.
2. Checklists were missing for two audits conducted in October 1978 and May 1979.
3. Two deficiencies identified in an audit conducted in October 1980 were not evaluated for implementation of corrective action during a subsequent audit conducted in November 1981.

This is a Severity Level V Violation. (Supplement VII)

Pursuant to the provisions of 10 CFR 2.201, Texas Utilities Generating Company is hereby required to submit to this office, within 30 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. Consideration may be given to extending your response time for good cause shown.

Dated: February 28, 1983