

Appendix

NOTICE OF VIOLATION

Cincinnati Gas and Electric Company

Docket No. 50-358

As a result of the inspection conducted on November 2-5, 1981, January 18-22, 25-28, February 10-12 and 16-18, 1982, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified:

1. Criterion I of Appendix B to 10 CFR 50 states, in part, "The authorities and duties of persons performing activities affecting the safety-related functions shall be clearly established and delineated in writing. These activities include both the performing functions of attaining quality objectives and the quality assurance functions."

Section NA 4210 of Section III of the ASME Boiler and Pressure Vessel Code requires in part, "The authority and responsibility of those in charge of the Quality Assurance Program shall be clearly established and personnel performing quality assurance function shall have sufficient and well-defined responsibility and authority."

ANSI N45.2-1971, Sections 2 and 3, require in part, "The program shall clearly delineate the responsibility and authority of the various personnel involved."

ANSI N45.2.6-1978 (Regulatory Guide 1.58), Section 1.3 requires in part, "Organizations responsible shall be identified and the scope of the responsibility shall be documented including specifying the detailed methods and procedures for meeting the requirements of the Standard."

Wm. H. Zimmer Nuclear Power Station Quality Assurance Manual, Section i.3, requires in part, "The QA Program is formulated to comply with Appendix B of 10 CFR 50 and the ASME Boiler and Pressure Vessel Code, Section III."

Contrary to the above, clearly established and documented authorities and duties of all QA Department personnel were not provided for Quality Engineers and Quality Control Technicians.

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

2. Criterion II of Appendix B to 10 CFR 50 requires, in part, "The quality assurance program shall provide control over activities affecting quality of items to an extent consistent with their importance to safety, including special skills and indoctrination and training of personnel to obtain and maintain proficiency."

Section NA 4220 of Section III of the ASME Boiler and Pressure Vessel Code requires in part, "All personnel performing functions within the scope of this section shall be qualified."

ANSI N45.2-1971, Section II, requires in part, "The program shall provide for the assurance of quality, special skills, and indoctrination and training of personnel performing activities affecting quality as necessary to assure that suitable proficiency is achieved and maintained."

ANSI N45.2.6-1978 (Regulatory Guide 1.58), delineates the requirements for the qualification of personnel who perform inspection, examination, and testing to verify conformance to specified requirements including addressing organizational responsibility, indoctrination and training, candidate initial capabilities, performance evaluation, written certification of qualification, and qualification requirements.

Wm. H. Zimmer Nuclear Power Station Quality Assurance Manual, Section i.3, requires in part, "The QA Program is formulated to comply with Appendix B of 10 CFR 50 and the ASME Boiler and Pressure Vessel Code, Section III."

Contrary to the above, CG&E failed to provide adequate certification of qualifications for all QAD department personnel including the Acting QA Manager/Supervisor of Quality Engineering, Quality Engineers, and Reviewers.

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

3. Criterion V of Appendix B to 10 CFR 50 requires in part, "Activities affecting quality shall be prescribed by documented instructions and procedures which include appropriate quantitative and qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

Wm. H. Zimmer Nuclear Power Station Quality Assurance Manual, Sections i.3 and 5.3 state in part, "The QA Program is formulated to comply with Appendix B of 10 CFR 50 and written instructions and procedures include the acceptance criteria which comply with the requirements of the design criteria and applicable codes and standards respectively."

Contrary to the above, Procedures QACMI E7, Revision 15, "Cable Pulling," and QACMI E8, Revision 14, "Cable Wire Termination Inspection," did not adequately address the quality requirements. The associated activities had been performed utilizing the procedures.

This is a Severity Level V 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.

Dated

James G. Keppler
Regional Administrator