

APPENDIX A

NOTICE OF VIOLATION

Arizona Public Service Company
P. O. Box 21666
Phoenix, Arizona 85036

Docket No. 50-528
Construction Permit No. CPPR-141

As a result of the inspection conducted on January 4-21, 1983, and in accordance with the NRC Enforcement Policy, 10 CFR Part 2 Appendix C, 47 FR 9987 (March 9, 1982), the following violations were identified:

- A. 10 CFR 50 Appendix B Criterion V, as addressed in Section 17 of the PSAR, 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...."

Bechtel Welding Standard WD-1, Revision 1, dated February 17, 1981, paragraph 1.3 states:

"This procedure includes checklists and other forms to be used for documenting satisfactory accomplishment of the fabrication and examination processes. The use of these checklists and forms provides assurance that welding is performed and examined in accordance with specified procedures, that welding procedures and welders and/or welding operators are qualified in accordance with the ASME Code, Section IX, and that specified and certified materials are used for fabrication. Provisions are made for witnessing or inspecting by the Authorized Nuclear Inspector (ANI)."

Contrary to the above, on or about February 12, 1982, an unauthorized undocumented weld was made in Line RDB-012-XCCA-4" one inch north of field weld FH-302 shown on MCN-1-10441P dated January 9, 1982. The weld was subsequently ground even with the pipe on the outside and inside diameter to make visual detection of the weld difficult.

This is a Severity Level V violation (Supplement II) applicable to Unit 1.

- B. 10 CFR 50 Appendix A, Criterion 1, states in part:

"Structures systems and components important to safety shall be designed, fabricated, erected and tested to quality standards commensurate with the importance of the safety functions to be performed. Where generally recognized codes and standards are used they shall be identified....to assure a quality product in keeping with the required safety function.

The Arizona Nuclear Power Project Design Criteria Manual Part III, Revision 3 dated October 5, 1979 for the "Radioactive Waste Drains System" paragraph 1.2.b. identifies "American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section III" as the applicable code for "Piping and Valves Auxiliary Building Engineered Safety Features (ESF) Room Drainage".

The ASME Boiler and Pressure Vessel Code, Section III, subsection ND, 1974 Edition including the Winter 1975 Addenda, paragraph ND 3676.9 states: "Supports shall be furnished as specified in Subsection NF to protect piping against detrimental sagging, external mechanical injury, abuse, and exposure to unusual service conditions."

Contrary to the above pipe supports were not engineered or provided for the Radioactive Waste Drain System piping added to Drawing 13-P-ZAE 200, Revision 6 by Drawing Change Notices DCN Nos. 7 and 8. The piping was installed without pipe supports as authorized by Modification Change Notice No. 1-10441-P dated January 9, 1982, which was verified complete by the quality control inspector on March 4, 1982.

This is a Severity Level V Violation (Supplement II) applicable to Unit 1.

Pursuant to the provisions of 10 CFR 2.201, Arizona Public Service 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 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.

MAR 02 1983

Dated

Original signed by
T. Young

T. Young Jr., Chief
Reactor Projects Section 2