

Appendix

NOTICE OF VIOLATION

Union Electric Company

Docket No. 50-483

As a result of the inspection conducted on November 29-30 and December 1-3, 1982, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified:

1. 10 CFR, Criterion V, states in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings...and shall be accomplished in accordance with these instructions, procedures or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

Daniel International Procedure WP-303, Revision 13, "Installation of Wire and Cable," states in Section 3.10, "Caution must be observed to prevent exceeding maximum allowable pulling tensions for any particular type cable specified by Reference 2.14 (Bechtel Drawing No. E-01013(Q))."

Bechtel Drawing No. E-01013(Q), Revision 6, "Installation, Inspection, and Testing Details for Electrical Equipment and Cable," Paragraph 5.3.4, states in part, "Neither the pulling tension nor the sidewall pressure shall exceed the maximum value in Appendix B." Appendix B to Drawing E-01013(Q) lists the maximum sidewall pressure for Cable Code B32 triplexed cable as 450R pounds (R is the radius in feet).

Contrary to the above, the tension exerted in pulling Class 1E Cable No. 1ALB01AA apparently resulted in the maximum allowable sidewall pressure exceeding Bechtel's design specification. The subject cable was pulled through a three foot radius conduit (1B2F1E) bend with a tension of 2300 pounds, in apparent violation to Bechtel's design criteria of 1350 pounds.

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

2. 10 CFR 50, Appendix B, Criterion XIII, states in part, "Measures shall be established to control the handling storage,...and preservation of material and equipment in accordance with work and inspection instruction to prevent damage or deterioration."

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SNUPPS Standard Quality Assurance Manual, Section 17.2.13 states in part, "Safety-related items including safety-related parts of structures, systems and components shall be handled, stored, ...and preserved in accordance with procedures, instructions...to assure that the quality of item is preserved..."

Contrary to the above, the inspector observed the following instances where adequate care to prevent damage to Class 1E equipment was not adhered to in accordance with the licensee's Quality Control Procedure QCP 305.

- a. As of December 3, 1982, scaffold was found placed on top of four safety-related load centers NG01, NG02, NG03 and NG04.
- b. Flexible conduit connected to Raceway 1U1222 was broken, leaving the cable exposed. In addition, the cable jacket was damaged and the minimum bend radius was apparently exceeded.

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.

3-7-83
Dated

"Original signed by W. S. Little"

W. S. Little, Chief
Engineering Programs Branch