

APPENDIX B

Cooper Industries
Cooper Energy Services
99900317/82-01

NOTICE OF NONCONFORMANCE

Based on the results of an NRC inspection conducted on September 20-24, 1982, it appears that certain of your activities were not conducted in accordance with NRC requirements as indicated below:

Criterion V of Appendix B to 10 CFR Part 50 states: "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. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

Nonconformances with these requirements are as follows:

- A. Paragraph 4.2 and its subparagraphs 1 and 2 of Quality Control Procedure (QCP)-10-14, Revision 1, dated December 10, 1980, state in part:

Nonconformances not previously reported or approved by an MRR, that are known by anyone to exist in a critical item, shall be reported

If the procedure defined in 4.2.2 cannot be followed for any reason, direct notification may be made The procedure defined in 4.2.2 shall, however, be utilized whenever possible to do so.

An MRR shall be issued in accordance with QCP-10-6.

The requirements were the same in the previous edition of QCP-10-14.

Contrary to the above, an MRR had not been issued regarding disintegration of the lube oil strainer basket.

- B. Paragraph 4.2 and its subparagraphs 1 and 2 of QCP-10-6, Revision 1, dated October 15, 1976, state that Copy No. 1 of the MRR is distributed to Liaison Engineering for review, disposition, and approval. Approval is indicated by signature on Copy No. 1.

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Contrary to the above, MRR No. 22203, dated December 2, 1980, had not been distributed to, reviewed, dispositioned, and approved by Liaison Engineering. This is indicated by the signature on Copy No. 1 of an individual who was not a member of Liaison Engineering.

- C. Paragraphs 2.1 and 2.2 of Quality Control Inspection Plan (QC/IP)-01C-1 ID3, Revision 19, dated September 12, 1980, state in part, respectively, regarding verification of approved vendor seismic reports, "Sign and date QC/IP-01C-01 Mark 'X' in first column to identify applicable Part No. and Vendor (sic)."

Contrary to the above, a signature and an "X" had not been entered in the QC/IP for Fuel Oil Pump, Part No. 2-11P-118-003, MO/SN 2F0201, which had been processed on June 2, 1982.

- D. Paragraphs 4.4.1, 4.4.2, and 4.4.3 of QCP-10-1, Revision 4, dated May 11, 1978, state in part, respectively:

The inspector who performs the operation designated by the Inspection Plan shall enter the requested response and signify acceptance by entering his clock number and date in the appropriate spaces.

Completed Inspection Plans shall be reviewed and verified complete by the Inspector who closes the order He shall also enter his clock number and date in the space in the order closing section of the Inspection Plan

Completed Inspection Plans shall be reviewed by the Quality Control Supervisor superior to the closing Inspector. He shall sign the Inspection Plan below the clock number of the closing inspector to certify that the Inspection Plan is complete, true, and accurate to the best of his knowledge and abilities.

Contrary to the above:

1. The inspector had not entered the clock number and date in the appropriate spaces for completed operations on pages 1 and 2 (columns 2-6, 2 and 3, respectively) of QC/IP-01V-3 for Valve, Part No. 2-01V-422-008, Serial Nos. 2E2602 through 2E2610. Only one clock number and date are reflected for columns 9, 10, and 11 on page 2. The QC/IP had been completed by the inspector and supervisor on June 1, 1982.
2. The inspector had not entered the dates for completed operations at columns 2 and 4 through 6 of QC/IP-SF-29 ID3 for Tubing, Part No. 2-99T-034-032, Serial No. CB 1279113. The QC/IP had been completed by the inspector and supervisor on December 17 and 20, 1979, respectively.

3. The inspector had not entered the dates for completed operations at columns 1, 2, 7, and 8 of QC/IP-02T-5 for Part No. 2-02T-255-018, Serial Nos. S68 (5 each). The QC/IP had been completed by the inspector and supervisor on March 11 and 17, 1980, respectively.

E. Paragraph 4.5.6 of QCP-10-1, Revision 4, dated May 11, 1978, states in part:

A Certificate of Conformance shall be completed for each unit upon completion of the performance test and after all documentation has been reviewed as described above. This certificate shall be of the form shown in Exhibit D or be an equivalent customer supplied form, and shall be reviewed and signed by either the Quality Control Manager or the Manager of Quality Engineering

Contrary to the above, the following Certificates of Conformance for spare parts had not been signed by the Manager of Quality Control or the Manager of Quality Engineering: (1) Fuel Oil Pump, Part No. 2-11P-118-003, Serial No. 2F0201, dated June 22, 1982, for Commonwealth Edison PO No. 257849; (2) Distributor, Part No. LSV-19-3B#4, Serial No. 2F1801, dated August 3, 1982, for the PO No. above; (3) Governors, Part No. 2-02G-048-001, Serial Nos. 1370292 and 1370295, dated August 26, 1982, for Louisiana Power and Light PO No. WP3-9176; (4) Valves, Part No. 2-01V-422-008, Serial Nos. 2E2602, 2E2605, 2E2606, 2E2608, and 2E2610, dated June 16, 1982, for Arizona Public Service PO No. 10407-F-144858-S-H0.

Further, the certificates are not the form shown in Exhibit D or customer-supplied equivalents.