

Appendix

NOTICE OF VIOLATION

The Detroit Edison Company

Docket No. 50-341

As a result of the inspection conducted on September 8-10, 1982, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified:

1. 10 CFR 50, Appendix B, 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."

The Detroit Edison Quality Assurance Manual, Section 9.0.1, states that "Activities affecting quality shall be prescribed by appropriate written instructions, procedures, or drawings and shall be accomplished in accordance with these documents."

- a. Paragraph 3.10 of the Daniel Construction Procedure AP-VII-02 states, "At any time during the review and approval of a DDR that information is determined to be inadequate, incorrect, etc., the DDR shall be returned to the person who originally provided this information, for correction, and the DDR review/approval cycle shall then be repeated from the originator's Quality Manager forward."

Contrary to the above, after it was acknowledged in the response to DDR 1757 that the DDR contained incorrect information, the DDR was not returned to the person who provided the information for correction, and the DDR review/approval cycle was then not repeated from the originator's Quality Manager forward. Instead, the DDR was voided."

- b. Paragraph 3.11 of Daniel Construction Procedure AP-VII-02 states in part, "the originator's Quality Manager shall mark the DDR void, sign and date and attach the void form to the DDR and transmit to the Project Quality DDR Coordinator."

Contrary to the above, the LKC Assistant QC Manager, instead of the QC Manager, who was present on site, marked the DDR void, and signed and dated the DDR.

- c. Paragraph 4.1.5 of Daniel Construction Procedure AP-VII-02 states in part, "If it is determined that there is no nonconformance, notify the originator to remove the hold tag. When the contractor number is used, annotate log." Also, Paragraph 3.4.3 of LKC Procedure 4.11.1 states in part, "Upon closure of the nonconformance document the Hold Tags shall be removed and the Hold Tag Report shall be annotated with the removal date."

Contrary to the above, even though DDR 1757, initiated on May 19, 1982, was closed on June 11, 1982 by marking it void, Hold Tag 1617 issued to DDR 1757 was still attached to the nonconforming conduit installation and the LKC QC Hold Tag Log indicated that Hold Tag 1617 remained open. Furthermore, even though DDR 1879 was initiated on August 19, 1982, a Hold Tag report was not initiated and maintained in the log by serial number.

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

2. 10 CFR 50, Appendix B, 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."

Paragraph 9.1 of DECo Procedure PQA No. 9 states in part, "Instructions, procedures, or drawings prescribing activities affecting quality shall delineate the method and sequence an activity is performed and include appropriate quantitative and qualitative acceptance criteria for determining the activity has been satisfactorily performed."

- a. Contrary to the above, LKC failed to establish qualitative and quantitative acceptance/rejection criteria relative to "adequate supports" for conduits. Consequently, LKC craftsmen and QC inspectors were unable to determine whether a conduit was adequately supported, or not, prior to initiating a cable pull.
- b. Contrary to the above, important inspection information contained in Memorandum 7-28-82 dated July 19, 1982, which stated "Class I conduit may not be supported temporarily for cable installation. Inspection of Class I conduit must be in accordance with Specification 3071-128 STD.ED," was not documented in a procedure and communicated to cognizant inspection personnel.

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

3. 10 CFR 50, Appendix B, Criteria XV states, "Measures shall be established to control materials, parts, or components which do not conform to requirements in order to prevent their inadvertent use or installation. These measures shall include, as appropriate, procedures for identification, documentation, segregation, disposition and notification to the affected organizations."

Section 16.1.5 of the DECo Quality Assurance Manual states, "Reports of nonconforming items shall be made on Deviation Disposition Request (DDR) forms to project engineering for dispositioning in accordance with Configuration Control Procedures." Paragraph 3.1.1 of LKC QC Procedure No. 4.11.1 states "Nonconforming Level I and Level II items shall be identified on a Deviation Disposition Request (DDR) (Attachment I) in accordance with Daniel Procedure AP-VII-02.

Contrary to the above, on September 9, 1982, during an inspection in the RHR Building, the inspectors found that LKC QC inspectors were using Field Surveillance Correction Reports (FSCRs) instead of DDRs to document nonconforming safety-related electrical conduit and conduit supports, for conditions such as inadequate spacing of conduit supports and anchor bolts, insufficient number of anchors, and damaged conduit, which were in nonconformance with the DECo Specification and drawings.

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

4. 10 CFR 50, Appendix B, Criterion XVI, states in part, "Measures shall be established to assure that conditions adverse to quality such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are properly identified and corrected."

The Detroit Edison Quality Assurance Manual, Section 17, states, in part, "QA, QC and Test Personnel shall promptly identify and report conditions adverse to quality, such as failures, malfunctions, deficiencies, nonconformances, defective material and equipment, and procedural nonconformances. In the event...prompt corrective actions is taken..."

Contrary to the above, though LKC DDR 1864 dated August 11, 1982 identified a severed cable in a tray, there was no documented indication that corrective action was taken to remove the severed cable.

Furthermore, even though LKC Field Engineering requested QC to research and furnish the cable number, this was not done. Instead, the DDR was voided.

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

W. S. Little, Chief
Engineering Programs Branch