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APPENDIX A

NOTICE OF VIOLATION

Washington Public Power Supply System
P. O. Box 1223
Elma, Washington 98541

Docket No. 50-508
Construction Permit
No. CPPR-154

As a result of inspections conducted on October 4-8 and November 1-3, 1982, and in accordance with the NRC Enforcement Policy 47 FR 9987 (March 9, 1982), the following violations were identified:

- A. 10 CFR 50, Appendix B, Criterion V states, in part, that: "Activities affecting quality shall be...accomplished in accordance with... procedures...."

Section 17.1.3 of the Quality Assurance Program as documented in approved PSAR Deviation No. 26-wp states, in part, that: "The procurement documents specify that the contractors and vendors of Supply System Quality Class I items and activities develop and implement design and interface control procedures which assure: (d) Proper design verification...is performed....(e) Individuals or groups responsible for design verification or checking are other than those who performed the original design."

Ebasco procedure No. E-76, "Guidelines for Design Verification," (January 20, 1982), paragraph 11.0 states, in part, that: "A design change shall be verified using the same method by the same group or organizations as the original design document." Paragraph 5.1.2 states that: "Qualified individuals meeting the definition of Independent Verifier as delineated in ANSI N45.2.11-1974, Paragraph 6.1 shall verify design outputs." Paragraph 4.4 states: "Independent Verifier -

An engineer, designer or any competent individual, regardless of classification, who shall review, confirm or substantiate a specification, calculations, drawing or other valid technical comments and meet the following criteria of independence: (1) did not specify a singular design approach, (2) did not rule out certain design considerations, (3) did not establish the design inputs for the particular design being verified."

Contrary to the above requirements, safety-related design changes effected by Project Change Proposal Nos. 2464, 2497, 5884, 5897, and 8734 were not verified by an individual independent of the individual who performed the original evaluation of the design changes.

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

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- B. 10 CFR 50, Appendix B, Criterion V states, in part, that: "Activities affecting quality shall be...accomplished in accordance with... procedures...."

Section 17.1.3 of the Quality Assurance Program as documented in approved PSAR Deviation No. 26-wp states, in part, that: "The procurement documents specify that the contractors and vendors of Supply System Quality Class I items and activities develop and implement design and interface control procedures which assure:...(c) Application of design control measures."

Ebasco Procedure No. E-30, "Preparation of Calculations," (November 20, 1979), paragraph 5.1.1 states, in part, that: "Each set of calculations should include some or all of the following items, depending on applicability: Cover sheet, table of contents, criteria, applicable codes and standards, assumptions...summary of calculation results." Paragraph 5.1.2 states that: "Where detailed calculations are not warranted, a calculation sheet shall be completed to clearly state the basis of how the design data was developed." Paragraph 5.1.3 states, in part, that: "Each set of calculations shall have a cover sheet....The calculation number may be a department-assigned number or a number assigned by the calculation originator." Paragraph 5.4 states that: "Assumptions and base data should be clearly stated, where they are introduced into the calculation, with justifications and source." Paragraph 6.2 states, in part, that: "The checker is responsible for checking all of the originator's calculation package. The checker shall initial and date each page of the original calculations after they are completely checked...." Paragraph 8.1 states: "Each discipline, or department, shall maintain a record of all calculations they perform." Paragraph 8.2 states: "All calculations shall be kept in binders which are labeled as to the general subject...."

Contrary to the above requirements, a calculation prepared to justify a safety-related cable tray support detail design change (PCP No. 2464) was not assigned a calculation number, was not checked and was not filed in the department calculation binder. The calculation did not contain a cover sheet which clearly stated the basis of how the design data was developed and did not clearly state assumptions with justification and source of base data.

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Pursuant to the provisions of 10 CFR 2.201, Washington Public Power Supply System is hereby required to submit to this office within thirty 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.

Date

R. T. Dodds, Chief
Reactor Projects Section No. 1