

APPENDIX A

Notice of Violation

Texas Utilities Generating Company  
Comanche Peak, Unit 1

Docket: 50-445/82-11  
Permit: CPPR-126

Based on the results of an NRC inspection conducted during September 1982, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 47 FR 9987, dated March 9, 1982, the following violation was identified:

Failure to Properly Indoctrinate and Train Personnel Performing Activities Affecting Quality

Criterion II of Appendix B to 10 CFR 50 requires that personnel performing activities affecting quality be provided with indoctrination and training, as necessary, to assure suitable proficiency is achieved and maintained.

Brown & Root Procedure CP-QAP-2.1, Revision 7, "Personnel Training and Qualification," requires quality superintendents /supervisors to provide employees with on-the-job training prior to certification. Brown & Root Procedure QI-QAP-2.1-1, Revision 4, "Nondestructive Examination Personnel Certification," requires 3 months of work time experience (on-the-job training) to achieve certification as a Level II liquid penetrant examiner.

Contrary to the above:

The Senior Resident Inspector, Construction, has determined through interviews with an alleged, the alleged's supervisor, the Brown & Root (B&R) site NDE Level III, and by a review of pertinent records that the alleged was certified by his supervisor to have had 175 hours or 1 month of work time experience (on-the-job training) for which there is only limited substantiation. The alleged has stated that he did not receive nearly 175 hours of on-the-job training at Comanche Peak in liquid penetrant inspection. The certificate, as worded, would have required the supervisor to have been in direct and immediate supervisory status over the alleged for substantially all of the time for 1 month. The supervisor has stated that this was not the case and that he does not know who was in direct and immediate supervision of the alleged during portions of his training. The formal certification of the alleged as a Level II liquid penetrant examiner by the site NDE Level III states that the 175 hours or 1 month of work time experience (on-the-job training) gained at Comanche Peak was one of the factors used by the Level III in his certification, yet the supervisor's certificate was not issued until nearly 2 weeks later. The other factors were that the alleged had taken

the required classroom training and had successfully passed the examination which was coupled with two additional months of credited work time experience gained on another B&R project. The Senior Resident Inspector would note, for the record, that the alleged could have been certified upon initial employment as a Level II liquid penetrant examiner based on prior certification at two other nuclear projects.

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

Pursuant to the provisions of 10 CFR 2.201, Texas Utilities Generating 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 violations; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Dated: DEC 13 1982