

APPENDIX A

NOTICE OF VIOLATION

GPU Nuclear Corporation
Oyster Creek Generating Station

Docket No. 50-219
License No. DPR-16

As a result of the inspection conducted on March 26-30 and April 2-3, 1984, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), published in the Federal Register on March 8, 1984 (49FR8583), the following violations were identified:

- A. 10 CFR 50, Appendix B, Criterion III requires that measures be established to assure that applicable regulatory design requirements are correctly translated in specifications, drawings, procedures and instructions. Measures are also required for control of design interfaces among participating design organizations. Design changes are required to be subjected to design control measures, including design verification, commensurate with those applied to the original design and approved by the organization that performed the original design.

Contrary to the above, as of April 3, 1984:

1. Appropriate measures had not been applied to control the design interface between GPUN and Stone and Webster in that GPUN approved and released revised design documents, such as the Mechanical Installation Specification OCIS-402017-001, without obtaining the approval of the original design organization (Stone and Webster). This resulted in design changes, such as changes in the codes applied to design/installation, where the review of the change was not commensurate with the review of the original design.
2. Design requirements were not correctly translated into drawings, procedures and instructions in that a design change to modify the installation for hanger NC-I*IPS-002-2 to preclude an interference, failed to incorporate a six degree angular constraint for the installation of the strut rod.
3. Regulatory requirements pertaining to fire protection, physical security, and protection from missiles were not translated into specifications, drawings, procedures, and instructions for the new cable spreading room and the associated tunnels for routing cable trays from the reactor building to that room.

This is a Severity Level IV Violation (Supplement I).

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- B. 10 CFR 50, Appendix B, Criterion V, and the Oyster Creek Quality Assurance Plan, Section 3 require that activities affecting quality shall be prescribed by and accomplished in accordance with documented instructions, procedures, and drawings of a type appropriate to the circumstances.

Contrary to the above, as of March 30, 1984, the GPUN Maintenance and Construction organization failed to:

1. Identify to QC, in accordance with installation procedures, the existence of seven conduit supports thus resulting in an unsatisfactory and uninspected conduit support system.
2. Install hanger NC-I*IPS-002-2 in accordance with the applicable design drawing and installation procedure.
3. Prescribe steps in the installation procedure for the Reactor Head Cooling modification to remove and reinstall a hanger in the Recirculation system although such work was performed during the installation of this modification.

This is a Level IV Violation (Supplement I).

- C. 10 CFR 50, Appendix B, Criterion VI states: measures shall be established to control the issuance of documents, such as instructions, procedures, and drawings, including changes thereto, which prescribe all activities affecting quality. These measures shall assure that documents, including changes, are reviewed for adequacy and approved for release by authorized personnel and are distributed to and used at the location where the prescribed activity is performed. Changes to documents shall be reviewed and approved by the same organizations that performed the original review and approval unless the applicant designates another responsible organization.

Contrary to the above, as of April 3, 1984:

1. For Mechanical Installation Specification OCIS-402017-001 and Electrical Installation Specification OCIS-402017-002, numerous changes were never incorporated as required by project procedure PI-19 which limited the number of outstanding changes against a specification to two.
2. Mechanical Installation Specification OCIS-402017-001, was originated by Stone & Webster (S&W), but was revised and issued by GPUN as Revision 0 without proper review for adequacy by S&W. Revisions 0 & 1 of this specification were not transmitted to S&W, the original design organization, for their review. As a result, S&W continued to use out-of-date design information in dispositioning other changes such as Field Change Requests.
3. Mechanical Installation Specification OCIS-402017-001, Revision 1 was issued without proper approvals. Project procedures required that the revision be reviewed and approved by the same organizations that reviewed

and approved the original issue. However, the revision was issued without the review and approval of QA which had reviewed and approved the original issue.

This is a Level IV Violation (Supplement I)

- D. 10 CFR 50, Appendix B, Criterion X, and the Oyster Creek Operation Quality Assurance Plan Section 6 require that inspections be performed to verify conformance of in-process and completed construction activities with documented instructions, procedures, and drawings. Examinations, measurements, or tests of material or products are required to be performed, where necessary, to assure quality. Further, 10 CFR 50, Appendix B, Criterion V, and the Oyster Creek FSAR Section 3 require that activities affecting quality shall be prescribed by and accomplished in accordance with documented instructions, procedures and drawings of a type appropriate to the circumstances.

Contrary to the above, as of March 30, 1984, QC inspections failed to verify conformance of construction activities with documented instructions, procedures and drawings or to assure quality in that they failed to identify the following:

1. A failure of hanger NC-I*IPS-002-2 to meet design drawing requirements in that the fillet welds connecting the clevis to the base plate were mislocated and undersized and as-installed dimensions differed from design dimensions rendering the functionability of the hanger questionable.
2. An ASME Class 3 valve installed in the Liquid Poison system that was designated ASME Class 2 for the purposes of modification work.
3. A hanger on the 2" line RHC-1 within the boundaries of modification work and existing before work commenced, which was not addressed or included in either the installation procedure or design drawings.
4. Arc strikes in two locations on 2" line RHC-1 in the Reactor Head Cooling system. For this case, QC visual inspection procedures were not appropriate in that they did not prescribe or require that arc strikes on valves and pipes be identified and evaluated.

This is a Level IV Violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, GPU Nuclear Corporation is hereby required to submit to this office within 30 days of the date of the letter transmitting this Notice, a written statement or explanation in reply, including for each violation: (1) the corrective steps which have been taken and the results achieved; (2) the corrective steps that will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.