

APPENDIX A

NOTICE OF VIOLATION

Arizona Public Service Company  
P. O. Box 21666  
Phoenix, Arizona 85036

Docket Nos. 50-526, 50-529, 50-530  
Construction Permit Nos. CPPR-141,  
142, 143

As a result of the inspection conducted on April 9-20, 1984 and in accordance with the NRC Enforcement Policy, 10 CFR Part 2 Appendix C, the following violations were identified:

- A. 10 CFR 50 Appendix B Criterion V, as addressed in Section 17 of the PSAR, states, in part: "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...."

Specification 13-PM-204, Revision 13 dated February 23, 1984 "Specification for Field Fabrication and Installation of Nuclear Piping Systems", paragraph 2.3 requires that all work be performed in accordance with ASME Section IX, Welding Qualifications.

The 1983 Edition of ASME Section IX including the Summer 1983 Addenda Article III, paragraph QW 304 requires each welder who welds shall have passed the tests prescribed for qualification.

Code Interpretation IX-79-02 issued January 3, 1979 states that there are no code provisions to permit qualification of a welder after the completion of production welding.

Contrary to the above, the engineering approvals of Corrective Action Request (CAR) C83-153N dated October 4, 1983 and Nonconformance Reports (NCR's) WC-733, WA-753, WC-806, WA-688 and WC-557 dated April 13, 1983, May 19, 1983, August 31, 1983, February 10, 1983 and May 12, 1982 respectively, authorized qualification of welders after the completion of production welding.

This is a Severity Level IV Violation (Supplement II) applicable to Units 1, 2 and 3.

- B. 10 CFR 50 Appendix B, Criterion V, as addressed in Section 17 of the FSAR states, in part: "...Instructions, procedures or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining what important activities have been satisfactorily accomplished."

Contrary to the above, PVNGS Station Manual Procedure Number 91HF-1RC01, Revision 0, "RCS Expansion Measurements" as modified by Test Change Notice (TCN) Number 2 specified inappropriate acceptance criteria for

evaluating acceptable reactor vessel movement during testing in Unit 1.

The acceptance criteria specified in paragraph 2.4.5 was that the combined clearances for each lower reactor vessel horizontal support was to be greater than 0.030 inches. This criteria is inappropriate since it is based on a condition with the lower expansion plates (shims) installed. The lower expansion plates (shims) had not been installed (as authorized by TCN 2) resulting in a combined clearance of approximately seven inches.

This is a Severity Level IV Violation (Supplement II) applicable to Unit 1.

- C. Appendix B of 10 CFR 50, Criterion III, requires in part that the design bases "...are correctly translated into specifications, drawings, procedures, and instructions."

ASME Boiler and Pressure Vessel Code, Section III, Division 1, 1974 edition (Winter 1975, Addendum), Subsection NB, paragraph NB-4711 specifies that thread engagement of threaded fasteners for mechanical joints on Class 1 components "...shall be engaged in accordance with the design."

Contrary to the above, design requirements for thread engagement were not specified in any of the licensee's specifications, drawings, procedures and instructions for threaded fasteners of mechanical joints for Class 1 piping and components at the time of the NRC inspection on April 9-20, 1984.

This is a Severity Level IV violation (Supplement II) applicable to Units 1, 2 and 3.

- D. Appendix E of 10 CFR 50, 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."

Bechtel WPP/QCI 350.112-3 for Regenerative Heat Exchanger Installation, paragraph 4.2, states in part, "Upper expansion support is secured utilizing jam nuts and flat washers...preassemble the connection with a flat washer and one (1) jam nut on each bolt. Alternately tighten each bolt hand tight. Back off each jam nut by 1/4 turn...thread the outer jam nut over the bolt...apply  $100 \pm 5$  in-lbs of torque to the outer jam nut while holding the inner jam nut in place..." Accomplishment of this step was verified by the Bechtel QC inspector as being complete on September 10, 1982 and so documented on WPP/QCI 350.112-3, paragraph 4.2.

Contrary to the above, the Regenerative Heat Exchanger upper expansion support, drawing 13-C-ZCS-576, revealed that one of the outer jam nuts was loose and the inner jam nut was backed off about 1 1/2 turns.

This is a Severity Level IV violation (Supplement II) applicable to Unit 3.

- E. 10 CFR 50 Appendix B Criterion V, as addressed in Section 17 of the PSAR, states, in part: "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished with these instructions, procedures, or drawings...."

Bechtel Procedure WPP/QCI 5.0, "Nonconforming Materials Parts and Components" Revision 25, Paragraph 9.1 states "Nonconforming items shall be identified by "Hold Tags", marking or other clear means of identification".

Contrary to the above, during an inspection during the week of April 16-20, 1984 of the cable storage and issuing area, it was found that five reels of safety grade cable were stored in a quarantine area for nonconforming material without being identified by a "Hold Tag".

This is a Severity Level V Violation (Supplement II), applicable to Unit 3.

Pursuant to the provisions of 10 CFR 2.201, Arizona Public Service Company 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.

6-8-84

Dated

PP Nault for

T. Young, Chief

Reactor Projects Section No. 2