

APPENDIX A

NOTICE OF VIOLATION

Northeast Utilities Company  
Millstone Nuclear Power Station  
Unit No. 3

Docket No. 50-423  
License No. CPPR-113

As a result of the inspection conducted on March 5-16, 1984, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), published in the Federal Register on March 9, 1982 (47 FR 9987), the following violations were identified:

- A. The Code of Federal Regulations, 10 CFR 50, Appendix B, Criterion XIII requires that measures be established to control the storage, cleaning and preservation of equipment to prevent damage and deterioration.

The Stone and Webster "Specification for Main Control Board (I 245)", Revision 5, dated November 15, 1982, states, in part, "The environmental conditions of the main control board...provided under this specification shall be maintained at the jobsite...provisions for dust, dewpoint and shock vibration control...shall be maintained.

Engineering Specification E-350 specifies equipment protection requirements in accordance with ANSI 45.2.2 which in turn requires protection from the effects of temperature, humidity, and airborne contamination.

Contrary to the above, on or before March 5, 1984, the main control board was not protected from damage and deterioration in that there was evidence of dust on the interior and exterior surfaces. Further, main control board No. 1 had the front panel removed and metal grinding operations were being performed in proximity to the open panel.

Contrary to the above, on or before March 5, 1984, protective covers and seals have been left off of installed electrical equipment conduits and junction boxes, exposing the equipment to airborne contamination by allowing construction dirt to penetrate into the electrical equipment.

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

- B. 10 CFR Appendix B, Criterion V, requires that "...Instruction, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished." Stone and Webster Engineering and Design Coordination Report (E&DCR) FE-16874, dated June 6, 1983, directed preparation and potting activities for Litton VEAM CIR connectors. The Litton VEAM Instruction Procedure, VAP-201 for VEAM CIR connectors requires that the potting of those connectors be accomplished in an environment free of airborne dirt and that protection be provided during curing and setting. Further, it requires control of the temperature, humidity, and cleanliness during the mixing stages.

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Contrary to the above, on March 8, 1984, the electrical craft personnel were preparing and potting a series of Litton/VEAM CIR connectors, 3GSNNPC900 and 3GSNNPC600, in a dirty airborne environment and did not protect the connector during the setting and curing periods from this environment. Also there was no quality inspection attribute verification of the temperature, humidity and cleanliness of the potting compound ingredients during the mixing stages of the VAP 201 Epoxy Potting Compound.

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

- C. 10 CFR 50, Appendix B, criterion V requires that activities affecting quality shall be accomplished in accordance with documented instructions, procedures, or drawings. Stone and Webster Specification M-968, Appendix N requires that the erection of piping swing strut assemblies should allow for angular clearance of  $\pm 5^\circ$ .

Contrary to the above, on March 5-16, 1984, it was found that the rod end of the ITT Grinnell hanger strut No. 3 -CCP-2-PSR039 was jammed against the weld on the inside of the rear bracket, and thus did not allow the required angular movement of  $\pm 5^\circ$  of the rod.

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

- D. 10 CFR 50, Appendix B, Criteria V requires that 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. Stone and Webster design drawing ES-31J-3, detail AJ, shows the end connection of floor beams No. 34B1 (W14X90) and 33B3(W14X90), in the main steam valve building at elevation 53'-0", to the concrete wall on column line No. 47. The drawing details shows a complete bearing in contact with the beam seat.

Contrary to the above, a continuous gap in the case of beam No. 34B1 and a partial gap in the case of beam No. 33B3 was visible between the bottom flange of the beam and the beam seat. These gaps resulted in no bearing of the one beam and only partial bearing in the other.

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

- E. 10 CFR 50, Appendix B, Criterion VI states, "Measures shall be established to control the issuance of documents, such as ...drawings, including changes thereto,... These measures shall assure that documents, including changes, are reviewed for adequacy and approved for release..." EAP 5.4, "Review and Approval of Project Production Drawings," Section 4.7 requires revised drawings be reviewed and approved using the same review and approval cycle as applied to the original issue. EDTS-AG19-1-1 requires that all design drawings, when reissued for changes, have all areas of changes identified by freehand circling.

Contrary to the above, drawing EE-34KW, Revision 03, was issued without the design change to cable tray support C013 being encircled. As a result, neither Construction nor FQC was aware of the change made to a previously installed and QC-inspected support. No steps had been taken to document, review and correct the items on the support that were non-conforming to the new design.

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

- F. 10 CFR 50, Appendix B, Criterion V, requires that instructions or procedures include appropriate quantitative or qualitative acceptance criteria to determine that activities have been satisfactorily accomplished. The Northeast Utilities Quality Assurance Program Topical Report, Revision 5, Appendix D, invokes Regulatory Guide 1.116 which in turn endorses ANSI 45.2.8-1975. ANSI 45.2.8-1975, paragraph 3.5 specifies that inspections or checks shall be performed on mating parts such as flanges to insure proper positioning.

Contrary to the above, on or before March 5, 1984, safety related pump flanges were not required to be checked or inspected for proper positioning as evidenced by installation and inspection procedures for the component cooling water pumps 3CCP \*E1-A, B, and C.

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

Pursuant to the provisions of 10 CFR 2.201, Northeast Nuclear Energy Company is hereby required to submit to this office within thirty days of the date of the letter which transmitted 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. Where good cause is shown, consideration will be given to extending this response time.

APPENDIX B

Significant Observations

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Based on the results of an inspection conducted on March 5-16, 1984, the following observations were made regarding the various aspects of your construction program.

- A. The following observations are considered to be strengths in your program:
- The document control record card system and the 100% weekly audit of the previous week's work.
  - The extensive use of computerized management information systems.
  - The NUSCO Quality Assurance trending system.
  - The Stone and Webster training, qualification, and certification of FQC inspectors.
  - The equipment qualification program.
- B. The below listed are considered program weaknesses:
- NEAM requires all designated Nonconformance and Disposition Reports to be incorporated on revision of the drawing. This is not being done in selected cases where it is known the drawing will be revised again in the immediate future. This causes a conflict with the procedural requirement.
  - The Joint Utilities Management Audits (JUMA) are ineffective in satisfying the commitment to perform annual management QA audits. The JUMA was too broad in scope and too short in duration to provide upper management with an indepth overview of the QA Program.
  - The failure of NUSCO to positively follow safety related design changes they have initiated and directed S&W to install.