

Appendix A

NOTICE OF VIOLATION

Detroit Edison Company  
Enrico Fermi 2

Docket No. 50-341

As a result of the inspection conducted November 14-18, November 28 - December 2, December 5 and 14, 1983, January 6, July 11-13, July 25-27, and August 10, 1984, and in accordance with the General Policy and Procedures for NRC Enforcement Actions, (10 CFR, Part 2, Appendix C) the following violations were identified:

1. 10 CFR 50, Appendix B, Criterion XVII, as implemented by the DECo Quality Assurance Manual, requires that sufficient records be maintained to furnish evidence of activities affecting quality and that the records include closely related data such as qualifications of personnel.

Contrary to the above, the licensee failed to include a written basis for QC inspector certification as a part of the certificate required by ANSI N45.2.6-1973, and to provide adequate backup data to substantiate that basis.

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

2. 10 CFR 50, Appendix B, Criterion XVIII, as implemented by the DECo Quality Assurance Manual, requires that a comprehensive system of planned and periodic audits be carried out to verify compliance with all aspects of the quality assurance program and followup actions, including reaudit of deficient areas, be taken where indicated.

Contrary to the above, the Region III inspector identified the following:

- a. No audits which addressed the quality assurance program implementing procedures (i.e., WB-As, WB-Cs, WB-Es, and WB-Qs) had been conducted by Wismer and Becker.
- b. The effectiveness of corrective action with regard to a DECo audit of Bechtel (Audit No. 83-07, Finding No. 83-07-01D) was not adequately assessed, in that (1) the acceptability of Bechtel's assessment relative to the findings's impact on hardware was not reviewed by DECo and (2) no objective evidence existed to substantiate that the training specified in the corrective action had been conducted.

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

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3. 10 CFR 50, Appendix B, Criterion X, as implemented by the DECo Quality Assurance Manual, requires that a program for inspection of activities affecting quality be established and performed to verify conformance with requirements.

Contrary to the above, Wismer and Becker failed to establish a pipe bending inspection program or monitoring system to ensure that (1) a qualified bending procedure was being employed in the field, (2) a qualified bending machine was being used for production bends, and (3) that dimensions for ovality and wall thickness were in compliance with the ASME Code.

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

4. 10 CFR 50, Appendix B, Criterion XII, as implemented by the DECo Quality Assurance Manual, requires that measures be established to ensure that measuring and testing devices, used in activities affecting quality, be properly controlled, calibrated, and adjusted at specified periods to maintain accuracy.

Contrary to the above, the Region III inspector identified the following:

- a. Wismer and Becker failed to procedurally establish adequate measures to ensure proper control and calibration of measuring and test equipment.
- b. Wismer and Becker failed to evaluate the validity of previous inspections or test results accomplished with lost calibrated items as required by ANSI N45.2, Section 13.

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

5. 10 CFR 50, Appendix B, Criterion II, as implemented by the DECo Quality Assurance Manual, requires that the quality assurance program provide control over activities affecting the quality of the identified structures, systems, and components to an extent consistent with their importance to safety, and that the program provide for indoctrination and training of personnel performing activities affecting quality as necessary to ensure that suitable proficiency is achieved and maintained.

Contrary to the above, the Region III inspector identified the following:

- a. An adequate training program had not been established and executed for Wismer and Becker supervisory personnel responsible for safety-related piping installation.
- b. Wismer and Becker did not have in place adequate controls to ensure that the FSAR Chapter 14 commitments, for construction completion prior to jurisdictional transfer of systems, were being met.

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

6. 10 CFR 50, Appendix B, Criterion XV, as implemented by the DECo Quality Assurance Manual, requires that measures be established to control materials which do not conform to requirements in order to prevent their inadvertent use or installation, that the measures include disposition of nonconforming items, and that nonconforming items be repaired or reworked in accordance with documented procedures.

Contrary to the above, the Region III inspector identified the following:

- a. Nine instances in which Wismer and Becker documented nonconforming conditions in surveillance reports, thereby circumventing the established nonconformance control system.
- b. Wismer and Becker replaced a valve seat on a 24" drywell purge piping valve without generating a Supplemental Operation Process Traveler as required by W&P Procedure No. WB-E-130, thereby circumventing established procedural requirements.

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

7. 10 CFR Part 50, Appendix B, Criterion V, as implemented by the DECo Quality Assurance Manual, requires that activities affecting quality be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances, and be accomplished in accordance with those instructions, procedures or drawings.

Contrary to the above, the Region III inspector identified the following:

- a. Two foundation anchor bolts for the standby liquid control storage tank were not installed in accordance with Wismer & Becker Procedure No. WIS-G-106 and DECo Drawing No. 6M721-3029.
- b. The standby liquid control storage tank manway cover was not secured in accordance with Startup Instruction No. 7.8.0.01.
- c. Thirteen systems were identified with equipment which had been turned over to DECo by Wismer and Becker without review of the documentation packages as required by the Test and Startup Administrative Procedure Manual, paragraph 7.4.2-2(b).

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

8. 10 CFR Part 50, Appendix B, Criterion XVI, as implemented by the DECo Quality Assurance Manual, requires that conditions adverse to quality be promptly corrected and the cause of those conditions be determined and corrective action taken to prevent repetition.

Contrary to the above, the Region III inspector identified the following:

- a. Adequate corrective action was not taken by DECo with regard to Deviation Disposition Request No.s E-11430 and E-8632B and Nonconformance Report No. 83-1252.
- b. DECo failed to take prompt and effective corrective action with regard to NRC item of noncompliance No. 341/82-10-04.

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

9. 10 CFR 50, Appendix B, Criterion VII, as implemented by the DECo Quality Assurance Manual, requires that measures shall be established to ensure that purchased material, equipment, and services conform to the procurement documents.

Contrary to the above, DECo failed to provide appropriate source selection and evaluation for the following:

- a. P.O. No. ID-51500 (Bolting Material)
- b. P.O. Nos. NM-28306 and A-010276 (Printed Circuit Boards)
- c. P.O. No. A-117317 (Reactor Recirculation Valve Replacement Stem)
- d. P.O. No. 1A-85153 (Engineering Services)

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

10. 10 CFR 50, Appendix B, Criterion III, as implemented by the DECo Quality Assurance Manual, requires that measures shall be established for the selection and review for suitability of materials, parts, equipment, and processes that are essential to the safety-related functions of the structures, systems and components.

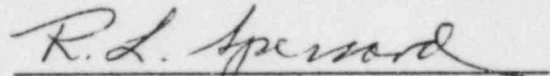
Contrary to the above, measures were not established to ensure adequate technical and quality reviews for the suitability of materials, including the qualification of commercial grade items prior to dedication for safety-related applications.

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

With respect to item 10, the inspection showed that action had been taken to correct the identified item of noncompliance and to prevent recurrence. Consequently, no reply to this item of noncompliance is required and we have no further questions regarding this matter. With respect to items 1 through 9, pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

SEP 21 1984

Dated \_\_\_\_\_

  
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R. L. Spessard, Director  
Division of Reactor Safety