

Appendix

NOTICE OF VIOLATION

The Detroit Edison Company

Docket No. 50-341

As a result of the inspection conducted on April 9 through July 2, 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 VI, as implemented by DECo Quality Assurance Manual, Section 5.0.1, requires that documents be adequately controlled, and to assure documents, including changes thereto, prescribing activities affecting quality be reviewed for adequacy and approved for release by authorized personnel, and properly distributed.

Contrary to the above, Engineering Mechanics Technical Supplements CHOC-EMTS-10-1, Fillet Weld Design Criteria for Pipe Supports, was revised by Stone & Webster Engineering Corporation interoffice memorandum dated October 19, 1981, and Engineering Mechanics Division memorandum CHOC-EMDM-81-27, Design Criteria For Detroit Edison Company Category I, II, and III Pipe Supports, was being altered by Detroit Edison Company Tel-Con-Note dated December 2, 1983. The subject interoffice memorandum and tel-con did not receive the same level of review or approval as the procedures they revised nor were they controlled in accordance with Detroit Edison Company's Quality Assurance Procedure Manual, Section 5.0.1.

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

2. 10 CFR 50, Appendix B, Criterion V, as implemented by DECo Quality Assurance Manual, Section 9.0.1, requires that activities affecting quality be prescribed by written instructions, procedures, or drawings, and accomplished in accordance with these documents.

Contrary to the above, the following examples of failure to follow written procedures were identified:

- a. There was no evidence of a Design Change Request revision to DCR No. P-6239 which documents the offsetting of a structural member attachment point to the base plate, since the 1/8 inch relocation tolerance was exceeded. A DCR is required by Wismer & Becker Procedure WB-C-114 if the 1/8 inch tolerance is exceeded.
- b. A weld was not performed on pipe support E41-3167-G17 because a Work Assignment Sheet/Material Notice (WAS/MN), as required by DECo Procedure FEWP-9, was not prepared by the Field Engineering Group.
- c. Stone & Webster Procedure CHOC-EMDM-81-27 requires that pipe supports be designed to a deflection criteria, however some supports have been designed to a stiffness criteria.

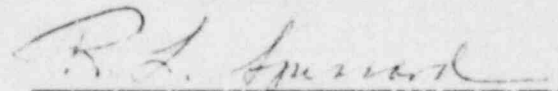
- d. Some minimum fillet weld sizes were not consistent with the Seventh Edition - ASIC Manual-1970, as required by Stone & Webster's pipe support calculation reference cover sheets.
- e. A stress intensification factor of 1.3 for all fillet welds, as specified by Stone & Webster Procedure CHOC-EMDM-81-27, is not being applied to the fillet weld calculations.
- f. Other calculational deficiencies and inadequacies were observed in large bore pipe support designs. These were also caused by Stone & Webster personnel failing to follow design procedures.

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

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.

JUL 30 1984

Dated \_\_\_\_\_

  
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R. L. Spessard, Director  
Division of Reactor Safety