APPENDIX A

NOTICE OF VIOLATION

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

Docket Nos. 50-528, 50-529, 50-530
Construction Permit Nos.
CPPR-141, 142, 143

As a result of the inspection conducted on July 9-13, 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 FSAR, states in part, "activities affecting quality shall be prescribed by documented instructions, procedures, or drawing...and shall be accomplished in accordance with these instructions, procedures, or drawings"

Honeywell procedures PEP 2.1 Rev. 3 (paragraph 5.3), PEP 2.20 Rev. 14 and Drawing No. HON-HJA-902 Rev. L thru N require that the HVAC instrument HJA-TIC-123 enclosure be mounted on unistruts, with the unistrut nuts seated correctly on the unistruts, and with full thread engagement. Additionally, the correct number and type of washers are required inside the enclosure to secure the terminal strips (blocks) and fuse/switch base plate in the enclosure.

Contrary to the above, during an inspection on July 11, 1984, of safety-related HVAC instrument 3-J-HJA-TIC-123 in the control room of Unit 3, the following was identified: (1) enclosure mounting unistrut nut (PC 18 on Drawing No. HON-HJA-902 Rev. N) was found incorrectly installed (cocked) on the unistrut such that it did not have full thread engagement with mounting bolt or full load bearing surface contact with the unistrut, (2) the lock washers (associated with a screw, PC. No. 34 on Drawing Nos. HON-ZZ-909-2 Rev. E and HON-ZZF-932-1 thru-9 Rev. D) were not installed in all applicable locations, instead flat washers were installed in some locations. The screw, nut and lockwasher assembly noted above are used to secure terminal strips (blocks) and fuse/switch base plates in the enclosure. This instrument was installed May 5, 1984 and QC accepted May 14, 1984 on an installation data sheet (form No. HM-002).

This is a Severity Level IV Violation (Supplement II), Applicable to Unit 3.

B. 10 CFR 50 Appendix A Criterion 2 states in part, "Structures, systems, and components important to safety shall be designed to withstand the effect of natural phenomena such as earthquakes, tornadoes, hurricanes, floods, tsunami, and seiches without loss of capacity to perform their safety function...."

Specification 13-MM-650, revision 4 dated March 10, 1982, "Fire Protection Sprinkler and Spray System," section D.5.7.2 states in part, "The piping, supports, anchors and restraints for all sprinkler systems located in safety-related areas shall be designed to withstand Seismic

Category IX requirements...." Additionally, section DI.4.4 states in part "Seismic Category IX structures, systems, and components..... must be designed to retain structural integrity during and after an SSE but do not have to retain operability for protection of the public. The basic requirement is prevention of structural collapse and damage to equipment and structures required for protection of the public safety."

Additionally, Specification 13-MM-650 section D.5.7.9 states in part, "Contractor (Bechtel) shall review all calculations and designs of supports for these (safety-related) areas and make necessary modifications to meet Category IX requirements."

Contrary to the above, the calculations submitted by Viking for fire protection system piping (Bechtel Log No. 13-10407) were accepted, on October 20, 1980, but the calculations do not provide an analysis that demonstrate the Fire Protection piping system has been designed to retain structural integrity during an SSE seismic event. The calculations do not demonstrate that longitudinal system and component loads have been considered or reviewed.

This is a Severity Level IV Violation applicable to Units 1, 2 and 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.

AUG 8 1984
Dated

PP Noonan for
L. Miller, Jr., Chief
Reactor Projects Section 2