

APPENDIX A
NOTICE OF VIOLATION

Gulf States Utilities
River Bend Station, Unit 1

Docket: 50-458
Permit: CPPR-145

Based on the results of an NRC inspection conducted during the period of January 21-25, 1985, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 49 FR 8583, dated March 8, 1984, the following violations were identified:

1. Warehouse Controls

Criterion V of Appendix B to 10 CFR Part 50 states, in part, "Activities affecting quality . . . shall be accomplished in accordance with . . . instructions, procedures, or drawings . . ." This requirement also is in the approved quality assurance plan for Gulf States Utilities Nuclear.

Contrary to the above, the measures established for control of the Gulf States Utilities warehouse activities and the spare parts stored therein were not fully implemented. Examples are:

- a. Parts in the warehouse were not always labeled as required by paragraph 4.3.1 of procedure MHP-0002 with all ten items of information completed. Four examples are cited in the report details, all of which are presumably safety-related hardware because of the 1 or 1Q designation in the purchase order.
- b. Parts in the warehouse were not segregated by ASME class and from non-ASME parts as required by paragraph 4.4.5 of MHP-0002. Parts such as the control rod drive housing were stored in two different locations with non-ASME hardware (position indicator probe) on top of them.
- c. There was no documentation that measures had been taken to assure that chemicals were separated to avoid mixing in the event of an accident which is required by paragraph 4.4.3 of MHP-0002. There was no documentation that a safety-related chemical called "Super Cool" 1355 could be stored as it indeed was with various oils on the pad outside the warehouse.
- d. The quality record copies of "Equipment Storage History Cards" (ESHCs) and their associated "Maintenance Check Records" (MCRs) were not maintained as required by paragraph 5.0 of MHP-0004 as evidenced by the inability to produce such records for safety-related parts.
- e. Preventive maintenance was not accomplished on certain parts as required by paragraph 5.2 of MHP-0004 and their associated ESCHs as

evidenced by the inability to produce records of maintenance to procedure PMP-1000 for safety-related transformers identified on draft ESHCs 193 through 196.

- f. ESHCs have not been generated recently as required by paragraph 5.1 of MHP-0004 as evidenced by the absence of ESHCs for recent safety-related receipts of a pump and motor although 30 days had lapsed since receipt.
- g. QC monitoring of warehouse activities was not accomplished effectively or in accordance with paragraph 5.2 of MHP-0004 and QCU-3.10. A schedule has not been developed as required. Furthermore, as evidenced by the above findings, the monitoring has not been effective.

This is a Severity Level IV Violation. (Supplement II.D) (8502-01)

2. Records Storage

10 CFR Part 50, Appendix B, Criterion II, "Quality Assurance Program," requires the licensee quality program to be documented in written policies, procedures, or instructions and to be carried out throughout the plant life in accordance with those policies, procedures, or instructions.

This requirement is further amplified in Quality Assurance Directive 2, paragraph 3.2, which commits to Regulatory Guide 1.88 and ANSI 45.2.9, both of which concern records. ANSI 45.2.9-1974, paragraph 5.4.2, requires records not to be stored loosely. Also, they are required to be firmly attached in binders or placed in folders or envelopes for storage on shelving in containers.

Contrary to the above, storage of certain records were found not to be in accordance with the ANSI standard. In the Stone & Webster QC vault, records of ASME Class 1 piping systems were stored in paperboard file boxes on top of metal file cabinets. Also, some records were left loosely stacked on tables at the end of the day. In the licensee vaults (permanent plant files), records were stored in paperboard boxes where convenient; this is not in full accordance with ANSI which requires storage in containers on shelving; also, records are not to be stored loosely.

This is a Severity Level V Violation. (Supplement II.D) (8502-02)

3. Construction Records

10 CFR Part 50, Appendix B, Criterion XVII states, in part, "Sufficient records shall be maintained to furnish evidence of activities affecting quality." River Bend FSAR Chapter 17.1, paragraph 17.1A, commits to 10 CFR Part 50, Appendix B.

Contrary to the above, it was determined that records for six safety-related structural steel columns in the auxiliary building were not retrievable or available for review.

This is a Severity Level V Violation. (Supplement II.D) (8502-03)

Pursuant to the provisions of 10 CFR 2.201, Gulf States Utilities is hereby required to submit to this office, within 30 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 violations; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

MAR 18 1985

Dated: _____