

Appendix A

NOTICE OF VIOLATION

Based on the results of the NRC inspection conducted on June 19-23 and July 11-12, 1978, it appears that certain of your activities were not conducted in full compliance with the conditions of your NRC Construction Permit No. CPPR-147 as indicated below:

A. Failure to Provide Timely Response to Audit Findings

10 CFR Part 50, Appendix B, Criterion V states in part, "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."

KG&E QA Procedure KP13-2 states in part, "If the audit reveals that corrective action is necessary, the management personnel of the audited organization shall respond in writing within 30 days after receipt of document 'e' (audit report)."

Contrary to the above:

A review of KG&E Site Audits No. 57061-K11, 12, 13 and 15 conducted during November 1977 and April 1978 and Project Monitoring Audit of December 19-22, 1977, revealed that corrective action was necessary and the management responses to the audits exceeded the thirty day requirement by nine to forty-four days.

This is an infraction.

B. Failure to Provide Adequate Response to Audit Findings

10 CFR Part 50, Appendix B, Criterion XVIII states in part, "Audit results shall be documented and reviewed by management having responsibility in the area audited. Followup action, including re-audit of deficient areas, shall be taken where indicated."

SNUPPS Quality Assurance Manual, Section A-1 requires that ANSI N45.2.12 form a part of the basis for the SNUPPS QA program.

ANSI N45.2.12, paragraph 4.5.1 states, "Management of the audited organization or activity shall review and investigate any adverse audit findings to determine and schedule appropriate corrective action including action to prevent recurrence and shall respond to

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the report in writing within thirty days after receipt, giving results of the review and investigation. The reponse shall clearly state the corrective action taken to prevent recurrence."

Contrary to the above:

Management responses to KG&E Audits No. TE 57061-K11 through K-16 conducted during 1978, do not state the results of management review and investigation, nor do they clearly state the corrective action taken to prevent recurrence.

This is an infraction.