

APPENDIX A

NOTICE OF VIOLATION

Texas Utilities Electric Company
Comanche Peak Steam Electric Station

Docket: 50-445/84-16
Construction Permit: CPPR-126

Based on the results of an NRC inspection conducted during the period of May 14 through June 20, 1984, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 47 FR 8583, dated March 9, 1984, the following violations were identified:

A. Failure to Properly Inspect Cable Tray Hangers (CTHs)

10 CFR Part 50, Appendix B, Criterion X requires that the inspection program of activities affecting quality shall be established and conducted in a manner to verify conformance with the documented instructions, procedures, and drawings.

Procedure QI-QP-11.10-2, Rev. 27, "Cable Tray Hanger Inspection," specifies the inspection attributes for inspecting assembly, configuration, base plate grouting, welding, etc., for conformance with design drawings and documents.

Contrary to the above:

1. The NRC inspectors identified two cases where three supports shared common clip angle attachments to the concrete wall. CTHs 6503, 6504, and 6505 shared a common clip angle that was not called for on Drawing 2323-S-903, Detail D for Case SP4 or on Component Modification Card (CMC) 11097. CTHs 6576, 6577, and 6578 shared common clip angles that were not called for on Drawing 2323-S-903, Detail D for SP4.
2. The NRC inspectors identified two hangers where the dimensions did not agree with the drawings. CTHs 6632 and 6638 both have installed dimensions that are more than the $\pm 1/4$ inch allowed tolerance from those specified in the appropriate design documents. The dimensional errors are specifically documented on Nonconformance Report M84-01834. The dimensional errors of the members varied from $7/8$ of an inch to $1 1/8$ of an inch shorter than those shown on the FSE-00159 drawing.
3. The NRC inspectors identified two cable tray hangers that did not have the weld configuration specified on the design drawings.

CTH 6642 and CTH 6645 both had horizontal welds at the clip angle to support connection and the design drawings specified vertical welds.

4. The NRC inspectors identified five cable tray hangers that had wall/floor connections that did not conform to those specified by the design drawings. CTH 6657 had a bevelled washer that was improperly installed so that it actually decreased the bearing surface between the nut and the clip angle. CTH 5519 did not have 1/2 inch of grout under base plate as specified on Drawing 2323-S-913, Detail 6. CTHs 5491, 5498, and 5499 had clip angles that utilized a combination of welding to embed plates and Hilti bolts for the wall or beam attachment for which there was no detail.

The above are examples identified by the NRC inspectors where cable tray hangers were installed by the craft to conditions other than those specified by the identified design documents and the QC inspectors failed to identify and document these conditions.

This is a Severity Level IV Violation. (Supplement II.D) (445/8416-01)

B. Failure to Provide Controlled Issuance of Design Documents and Changes Thereto

10 CFR Part 50, Appendix B, Criterion VI, "Document Control," requires that documents, such as instructions, procedures, and drawings, including changes thereto, be controlled and properly distributed to the location where activities affecting quality are conducted. ANSI N45.2.11, Section 7 requires that documented procedures be used to control the issuance of design documents and changes thereto and that these procedures shall assure that documents are properly distributed.

Contrary to the above, it was determined that issuance of design documents and changes thereto were not being controlled by Operations Document Control Center (DCC). Specifically, the actual status of design drawings in the control room, file 003, could not be determined. The list of CMCs and design change authorizations identified by Operations DCC to be applicable did not agree with the Construction DCC list. In addition, the effective revision of Drawings 2323-M1-0301 (CP-5), M1-0261 (CP-4), and M1-0262 (CP-4) were not found in the control room file.

This is a Severity Level V Violation. (Supplement II.E) (445/8416-02)

Pursuant to the provisions of 10 CFR Part 2.201, Texas Utilities Electric Company, 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.

Dated: October 4, 1984