

APPENDIX A
NOTICE OF VIOLATION

Texas Utilities Electric Company
Comanche Peak Steam Electric Station, Units 1 and 2

Dockets: 50-445/84-32
50-446/84-11

Construction Permits: CPPR-126
CPPR-127

Based on the results of an NRC inspection conducted during the period of August 20, 1984, through September 20, 1984, 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. Failure to Regularly Review the Status and Adequacy of the QA Program

Criterion II of Appendix B to 10 CFR 50, as implemented by the Preliminary Safety Analysis Report (PSAR) and the Final Safety Analysis Report (FSAR), Section 17.1, "Quality Assurance Program," and ANSI N45.2-1971, requires that the quality assurance program shall provide for the regular review by the management participating in the program, of the status and adequacy of the part of the quality assurance program for which they have designated responsibility.

Contrary to the above, the applicant did not establish quality assurance procedures to regularly review the status and adequacy of the construction quality assurance program; nor did the applicant appear to have reviewed the status and adequacy of the construction quality assurance program.

This is a Severity Level IV Violation. (Supplement II) (445/8432-02; 446/8411-02)

2. Failure to Establish and Implement a Comprehensive System of Planned and Periodic Audits

Criterion XVIII of Appendix B to 10 CFR 50, states, in part, "A comprehensive system of planned and periodic audits shall be carried out to verify compliance with all aspects of the quality assurance program and to determine the effectiveness of the program." The requirements are addressed in the PSAR and FSAR, Section 17.1, "Quality Assurance Program," which references Regulatory Guide 1.28 (ANSI N45.2) and ANSI N45.2.12 (Draft 3, Revision 4). Those commitments require that a comprehensive system of planned audits be performed on an annual frequency.

Contrary to the above, the following examples were identified which demonstrate the failure to establish and implement a comprehensive system of planned and periodic audits of safety-related activities as required, as noted below:

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- a. Annual audits were not adequately addressed by the audit implementation procedures.
- TUGCO Procedure DQP-CS-4, Revision 0, dated August 9, 1978, only required two audits of vendors fabricating reactor coolant pressure boundary components, parts, and equipment; one audit of vendors fabricating engineered safeguards components, parts, and equipment; and audits of balance of plant (safety-related) as required by the quality assurance manager.
 - TUGCO Procedure DQP-CS-4, Revision 2, dated April 16, 1981, required only that organizations will be audited on a regularly scheduled basis.
 - TUGCO Procedure DQP-CS-4, Revisions 2 and 10, did not specify auditing frequencies for design, procurement, construction, and operations activities.
 - TUGCO Procedure DQP-CS-4, Revision 10, based audit requirements on Regulatory Guide 1.33, Revision 2, February 1978. This commitment did not fully address the requirements of the construction quality assurance program.

The above procedure and subsequent revisions failed to describe and require annual audits in accordance with commitments and requirements. Earlier audit procedures were not available to determine if they met requirements.

- b. Planning and staffing to perform 1983 audits was inadequate to assure that a comprehensive system of audits was established and implemented to verify compliance with all aspects of the quality assurance program, in that, of 656 safety-related procedures (which control safety-related activities) the NRC review revealed that the applicant sampled only 165, or 25 percent, during the 1983 audit program. Consequently, significant aspects of the safety-related activities were not adequately audited.
- c. The Westinghouse site organization, established in 1977 to perform Nuclear Steam System Supply (NSSS) engineering services, was not audited by TUGCO during the years of 1977, 1978, 1979, 1980, and 1981.
- d. Audits of vendors that manufacture or fabricate parts, components, and equipment for reactor coolant pressure boundary and engineered safeguards systems have not been conducted annually dating back to August 9, 1978.

This is a Severity Level IV Violation. (Supplement II) (445/8432-03; 446/8411-03)

3. Failure to Properly Certify a Vendor Compliance Inspector

Criterion V of 10 CFR 50, Appendix B, 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."

TUGCO Procedure DQP-VC-4, Revision 6, dated January 5, 1984, requires that Level II inspectors (Corporate QA) shall attend and satisfactorily complete nondestructive testing courses including eddy current testing.

Contrary to the above, one of six inspector's files had no documentation to show that the inspector had attended and completed an eddy current testing course. Subsequent discussions revealed that he had been certified without meeting this requirement. The vendor compliance supervisor stated that this inspection skill is not needed since there is no present vendor work activity which would require this skill; therefore, this procedure was revised and the requirement omitted during this inspection.

This is a Severity Level V Violation. (Supplement II) (445/8432-05; 446/8411-05)

Pursuant to the provisions of 10 CFR 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: _____