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NOTICE OF VIOLATION

Based on the results of an NRC inspection conducted on March 10-14, 1975, it appears that certain of your activities were not in full compliance with NRC regulations and the conditions of your license as indicated below. Each item is also a requirement of the Oyster Creek Operational Quality Assurance Plan (OQAP) which you submitted to the NRC as implementation of 10 CFR 50, Appendix B - Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants.

1. Criterion II, Appendix B, 10 CFR 50 requires that the quality assurance program shall be documented by written policies, procedures, or instructions and shall be carried out throughout plant life in accordance with those policies, procedures or instructions; that the program shall provide for indoctrination and training of personnel performing activities affecting quality as necessary to assure that suitable proficiency is achieved and maintained; that the quality assurance program provide control over activities affecting quality to an extent consistent with their importance to safety.
 - a. The Operational Quality Assurance Plan, Revision 1, dated September 30, 1974, Section II, states that the licensee will utilize the guidance of ANSI N45.2.6-1973. Articles 3 and 5 of ANSI N.2.6-1973 require qualification and certification of Level I, Level II and Level III inspection, Examination and Testing Personnel.

Contrary to the above, certain site personnel engaged in maintenance testing, examination, and inspection activities did not have the required certification defining levels of capability, in that persons performing testing following maintenance were not certified as Level I or II, nor were persons interpreting test data certified as Level II as specified by Section 3 of ANSI N45.2.6-1973.

This is a deficiency.

- b. Section III of the Operational Quality Assurance Plan states that the Oyster Creek Superintendent is responsible for preparation, review and approval of the plant maintenance procedure which specifies the manner in which plant maintenance and repair is controlled by distinguishing between

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different types of maintenance and repair and specifying the applicable requirements for the control of each. Implementing Procedure 105, "Maintenance, Repair and Modification Control," states that items which fall under the cognizance of the QA Plan shall be segregated and handled in accordance with this procedure.

Contrary to these requirements, twelve job orders reviewed during the inspection, all of which involved maintenance of safety related systems, were not segregated and handled as being under the control of the quality assurance program.

This is a deficiency.

2. Criterion III, Appendix B, 10 CFR 50 requires establishment of measures to 1) assure that the design basis, as defined in 10 CFR 50.2, is correctly translated into specifications, drawings, procedures, and instructions, and 2) for the identification and control of design interfaces and for coordination among participating design organizations. The OQAP, Section III, Revision 0, dated December 14, 1973, states that design control is implemented by Generation Engineering Procedures which include design review requirements, internal and external interface control considerations, and appropriate design bases.

Contrary to the above, regarding plant modifications, measures were not taken to include 1) consideration of design bases, 2) control of design interfaces, and 3) the coordination among participating design organizations, until the issuance on March 7, 1975, of Procedure 6003, "Modifications, Non-routine Maintenance, and Repair." Even then, the referenced procedure did not provide for the consideration of the design bases, not for coordination among participating design organizations in design review requirements for plant modifications.

This is a deficiency

3. Criterion V, Appendix B, 10 CFR 50 requires that 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. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

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- a. The Operational Quality Assurance Plan, Section IV requires that procurement documents prepared by or for the Generation Department be approved in accordance with the Generation Department Procedure. Generation Department Procedure 2001, Administration of Procurement, Revision 1, dated October 4, 1974, Section 3.2.2 requires Operational Quality Assurance review of and concurrence with procurement documents.

Contrary to the above, procurement documents for chemicals had not received Operational Quality Assurance review.

This is an infraction.

- b. Section V of the Operational Quality Assurance Plan requires that instructions and procedures associated with maintenance be implemented in accordance with the OQAP. Instruction SQA-1-74-G-004 requires a QA Specialist to review and then log QA related jobs in the inspection log, including the name of the job or system, the present plans for, and nature of the work to be done.

Contrary to the above, twelve safety-related job orders were neither reviewed nor logged by a QA Specialist.

This is an infraction.

- c. The Operational Quality Assurance Plan, Revision 0, dated December 14, 1973, provides in Section III, for a System Boundary and Classification Book for expanding the Quality Assurance Systems List (QASL) into categories of safety classes using Regulatory Guides 1.26 and 1.29 for guidance and specifying the basic codes, standards and regulatory requirements for each category. The OQAP, Appendix C, Revision 0, dated December 14, 1973, "Preliminary List of Procedures Implementing the Quality Assurance Program," lists, as one of the procedures which should be ready and issued by April 1974, the System Boundary and Classification Book.

Contrary to the above, required definition of equipment and component safety classification had not been accomplished: in that the System Boundary and Classification Book was not provided as of March 12, 1975.

This is a deficiency.

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- d. Technical Specification 6.2.C requires that operating procedures be followed. Section V of the OQAP states that Oyster Creek Superintendent is responsible for ensuring the instructions and procedures associated with operational testing are prepared, reviewed, approved, and implemented in accordance with the OQAP.

Contrary to the above, 1) the diesel fuel inventory log entries which serve to document maintenance of minimum fuel levels established by the Technical Specifications were not made as required by Procedure 301 for the period January 6 - February 3, 1975, 2) Station Battery "B" discharge test log entries required by Procedure 601 were not made on December 18-20, 1974, and 3) Control Rod Drive System testing log entries required by Procedure 603.3 were not made on January 27, 1975.

This is a deficiency.

- e. The Operational Quality Assurance Plan, Section V, states that the Oyster Creek Superintendent is responsible for ensuring that instructions and procedures are implemented. Procedure 102, Training of Nuclear Generating Station Personnel, Revision C, dated July 18, 1974, states that site training is conducted in accordance with detailed procedures specified in the Oyster Creek Training Manual.

Contrary to the above, detailed procedures specified in the Oyster Creek Training Manual were not being used to train non-licensed technicians and repair personnel, in that non-licensed technicians and repair personnel training was being conducted pursuant to Job Qualification Review Sheets prepared on each individual.

This is a deficiency.

- 4. Criterion VI, Appendix B, 10 CFR 50 requires that safety-related documents be reviewed for adequacy and approved for release by authorized personnel; that safety-related document changes be reviewed and approved by the same organizations that performed the original review and approval unless the applicant designates another responsible organization; and that safety related documents be distributed to and used at the location where the prescribed activity is performed.

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- a. Technical Specification Sections 6.1.C.1.d., 6.2.D and 6.2.E require Plant Operations Review Committee (PORC) review and Station Superintendent approval of plant operating and surveillance procedures prior to implementation.

Contrary to the above, procedure review and approval requirements were not met at the site: in that the procedure used on March 12, 1975, to obtain an Air Ejector radioactive Off-Gas sample had not received PORC review and Station Superintendent approval; and in that eight (8) of twenty-five (25) surveillance test procedures sampled were not reviewed by PORC prior to their implementation.

This is an infraction.

- b. Technical Specification 6.2.F provides that temporary procedure changes which do not change the intent of the original procedure may be made under specified circumstances which include subsequent review by PORC and approval by the Station Superintendent.

Contrary to the above, a temporary change made on January 24, 1974, to Procedure 609, was not subsequently reviewed by PORC and approved by the Station Superintendent.

This is an infraction.

- c. The Operational Quality Assurance Plan, Revision 0, dated December 14, 1973, Section VI, states that 1) a standard Generation Department procedure for document control includes basic generic controls to be incorporated by each manager, 2) the Generation Department document control procedure requires measures to insure documents are available when required, 3) the implementing procedures, including the document control procedure, should be complete and issued during April, 1974, and, 4) the Oyster Creek Superintendent is responsible for the implementation of the document control system for documents received or prepared at the generating station.

Contrary to the above, required document control was not provided in that 1) the document control procedure, or an equivalent control over as-built drawings and site issued documents was not provided as of March 12, 1975, and 2) as-built engineering drawings were not distributed to the

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licensee's Morristown Plaza Offices where Generation Engineering Department personnel are regularly engaged in decision-making engineering work requiring the use of as-built drawings.

This is an infraction.

- 5. Criterion VIII, Appendix B, 10 CFR 50 requires establishment of measures for identification and control of materials, parts and components to assure that identification of the item is maintained throughout installation and use. Section VIII of the OQAP states that the Oyster Creek Superintendent is responsible for maintaining identification and control of materials, parts, or components received, stored, installed, and used at the plant site. Procedures covering the identification and control of materials, parts, and components are prepared by the plant staff, reviewed by PORC, and approved by the Plant Superintendent. These procedures will be reviewed and concurred with by the Quality Assurance Supervisor for compliance with the OQAP. The Quality Assurance Supervisor is responsible for surveillance and audit of the implementation of these procedures by the plant staff and by site contractors. Station Procedure 3005 states that once an item is installed or used, the "RELEASED FOR USE" tag is removed and returned to Quality Assurance who records this fact on the Material Identification and Control Sheet and destroys the tag.

Contrary to the above, "RELEASED FOR USE" tags for materials used in the Core Spray System and the Fuel Pool Filter dated February 17, 1975, were neither on the equipment nor recorded on the Material Identification and Control Sheet.

This is a deficiency.

- 6. Criterion XI, Appendix B, 10 CFR 50 requires establishment of a test program to assure that all testing, including operational testing, required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents. The OQAP, Section XIV, requires, 1) that maintenance testing be conducted in accordance with specifications, maintenance procedures, etc., 2) that the work

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performance procedures require sign-off to assure that required inspections and tests are performed, 3) that the procedures be prepared and approved by the responsible organization, and 4) that the procedures be reviewed and audited by Operational Quality Assurance.

Contrary to the above, written and approved procedures which 1) defined the testing required, 2) identified individuals responsible for procedure and test review, and 3) specified the required test documentation, were not provided for at least one of the routine post maintenance testing activities covered by the twelve job orders referred to in Items 1(b) and 3(b) above.

This is an infraction.

- 7. Criterion XV, Appendix B, 10 CFR 50 requires establishment of measures to control materials, parts, or components which do not conform to requirements in order to prevent their inadvertent use or installation. Section XV of the OQAP requires that nonconforming items found during checks of modification, maintenance or repair work be clearly identified and documented, and that supervision and management be notified so that appropriate corrective action can be taken. In the event prompt corrective action is not taken, the QA Supervisor notifies the Manager-Operational Quality Assurance and the Oyster Creek Superintendent so that corrective action can be expedited. Section XVI of the OQAP states that corrective action procedures include provisions for evaluation of nonconformances, determination of suitable corrective action, responsibility for timely disposition and followup action, authority for approval of proposed corrective action, and the required documentation. Evaluation of a nonconformance includes consideration of the cause, other areas which could experience similar nonconformances, and solutions that would prevent a repetition of the nonconformance. Section XVI also states that Operational Quality Assurance procedures include provisions to assure that corrective action and documentation are accomplished.

Contrary to the above, the Condensate Transfer System was returned to service with unresolved nonconformances involving use of backing rings in welded pipe joints which is not permitted by the Engineering Specifications for the project (identified by licensee 10/25/74), failure to apply a protective coating before other welds are made

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as specified by the welding procedure (identified by licensee 10/24/74), field fit-up of a pipe section not provided for in the procedure (identified by licensee 10/24/74), cutting and rewelding a 20-foot section of pipe not covered in the procedure or in a written Engineering authorization (identified by licensee 10/24/74), and failure to conduct a required hydrostatic test (identified by licensee 3/8/75). As of March 12, 1975, these matters had not been resolved.

This is an infraction.

8. Section 4, Appendix A, 10 CFR 55 requires annual written examinations of licensed operators. The licensee's operator requalification program, approved by Reactor Licensing letter dated November 13, 1974, states that December 17, 1973 is the starting date for the annual cycle of the requalification program.

Contrary to the above, written examinations of licensed operators were not given when required, in that none of the twenty licensed operators were given written examinations on or before December 17, 1974.

This is a deficiency.

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