

APPENDIX A

NOTICE OF VIOLATION

Gulf States Utilities
River Bend Station

Docket: 50-458
Permit: CPPR-145

During NRC inspections conducted on March 11-15, April 1-5 and 22-23, May 14-16 and 21-24, June 3-6, and August 6-10, 1985, four violations of NRC requirements were identified. The violations involved design process for seismic Category I cable tray and conduit supports. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the violations are listed below:

A. Failure to Adequately Check Calculations

10 CFR Part 50, Appendix B, Criterion III, requires checking the adequacy of design.

Contrary to the above, four examples of inadequate checking of calculations were identified. Specifically, the calculations involved are analysis Case R3, calculation pp. E.S. 1483-ES.1494, the STRUD computer analyses for the cable tray hold-down connection, and calculation p. E.S.1358.

This is a Severity Level IV violation (Supplement I.D.) (50-458/8509-01).

B. Failure to Document and Verify Assumptions

10 CFR Part 50, Appendix B, Criterion V, requires that activities affecting quality be accomplished in accordance with documented instructions.

Section 4.2 of American National Standard N45.2.11 - 1974, "Quality Assurance Requirements for the Design of Nuclear Power Plants," requires that assumptions be documented and that those assumptions that must be verified as the design proceeds be identified.

Contrary to the above, the comparison method of design for the cable tray supports did not procedurally require that assumptions relative to critical support parameters and criteria for conservatism be documented or verified.

This is a Severity Level IV violation (Supplement I.D.)(50-458/8509-02).

C. Failure to Provide Basis for Design Input

10 CFR Part 50, Appendix B, Criterion V, requires that activities affecting quality be accomplished in accordance with documented instructions.

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Section 4.2 of American National Standard N 45.2.11 - 1974, "Quality Assurance Requirements for the Design of Nuclear Power Plants," requires that procedures include requirements for the definition of design inputs and their sources.

Contrary to the above, the basis for the 2D-3D factors applied to the two-dimensional analyses to account for three-dimensional effects in support systems were not procedurally required to be defined.

This is a Severity Level IV violation (Supplement I.D.)(50-458/8509-03).

D. Failure to Provide Adequate Disposition of Construction Deviation

10 CFR Part 50, Appendix B, Criterion XV, requires that inadvertent use or installation of components which do not conform requirements be prevented by established measures.

Contrary to the above, Engineering & Design Coordination Report C-24.199 and Nonconformance and Disposition Report 11957 were improperly dispositioned and the subject components were allowed to be installed.

This is a Severity Level IV violation (Supplement I.D.) 50-458/8509-04).

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 the letter transmitting this Notice, a written statement or explanation in reply, including for each violation: (1) the reason for the violations if admitted, (2) the corrective steps which have been taken and the results achieved, (3) the corrective steps which will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas,
this 29th day of January, 1986.