

Appendix A

NOTICE OF VIOLATION

Based on the results of the NRC inspection conducted on February 21-23, 1979, it appears that certain of your activities were not conducted in full compliance with the conditions of your NRC Construction Permits No. CPPR-128 and 129 as indicated below:

Failure to Follow Procedures for Storage of Material

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

Brown and Root Procedure CCP-3, "Prepour Activities," and Westinghouse Manual, "NSSS Component Receiving and Storage Criteria," require that:

1. Stainless steel material must not be in contact with carbon steel.
2. All materials will be stored elevated off the ground.

Contrary to the above:

During inspection of storage areas on February 21, 1979, the IE inspector observed:

1. A carbon steel band securing a 29" ID pipe assembly (identified as loop 3 RV/SG, SN13945) to its shipping skid was in contact with the stainless steel pipe.
2. Reinforcing steel stored in a laydown area near the Unit 1 Reactor Containment Building was in contact with the ground.

This is an infraction.

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Inspection Summary:

Inspection on February 21-23, 1979 (Report No. 50-498/79-03; 50-499/79-03)  
Areas Inspected: Routine, unannounced inspection of construction activities including observation of storage and maintenance of materials for Units 1 and 2; review of a reported 50.55(e) item; and review of previous inspection findings. The inspection involved sixty-three inspector-hours by three NRC inspectors.

Results: Of the three areas inspected, one apparent item of noncompliance was identified in one area (infraction - failure to follow procedures for storage of material - paragraph 3).

1. Persons ContactedPrincipal Licensee Employees

- \*T. R. Alford, Site Manager
- \*T. D. Stanley, Project QA Supervisor
- \*L. D. Wilson, Site QA Supervisor
- \*D. G. Long, Lead Engineer
- \*T. J. Jordan, Lead Engineer
- \*M. H. Smith, Plant QA Supervisor
- S. R. Smith, QA Specialist
- C. L. Grosso, Associate Engineer
- M. M. Johnson, Senior Engineer
- \*M. S. Monteith, QA Technician
- \*W. Moya, Construction Engineer

Other Personnel

- \*J. R. Monroe, Construction Project Manager, Brown & Root (B&R)
- \*G. T. Warnick, Site QA Manager, B&R
- \*D. B. Shumway, QC Supervisor, B&R
- B. D. Pointer, Engineering Concrete Technologist, B&R
- G. R. Murphy, Assistant Project Engineer, B&R
- J. Hamilton, Preventive Maintenance Supervisor, B&R
- L. Torres, Area Electrical Engineer, B&R
- F. Mancuso, Electrical Technician, B&R
- W. Leslie, Site Representative, Westinghouse

The IE inspector also interviewed other licensee and contractor employees including members of the QA/QC and engineering staffs.

\*denotes those attending the exit interview.

2. Licensee Action on Previous Inspection Findings

(Open) Infraction (50-498/78-16-2; 50-499/78-16-2): Failure to Provide Acceptance Criteria for Megger Testing of Class IE Motors. Procedure A040KPECP-2, Rev. 0, January 8, 1979, "Meggering," provides the required acceptance criteria for the meggering of Class IE equipment. This item will remain open pending review of recurrence control documentation for actions specified in HL&P response letter of February 14, 1979.

(Open) Infraction (50-498/78-16-3; 50-499/78-16-3): Failure to Follow Approved Procedures for QC Surveillance of Maintenance on Class IE Equipment. Procedure A040KPMCP-3, Rev. 4, November 21, 1978, "Handling, Storage, Installation and Maintenance of Permanent Nuclear Equipment," now more specifically defines the requirements for QC surveillance of maintenance during storage. A review of the maintenance records for Class IE equipment is being performed by B&R QC in accordance with the requirements of MCP-3. This item will remain open pending review of recurrence control documentation for actions specified in HL&P response letter of February 14, 1979.

(Closed) Deviation (50-498/78-17-A; 50-499/78-17-A): Reporting of Cadwelder Qualification Inspection and Test Results by Level I Inspector. The IE inspector was informed that Cadwelder qualification inspection and test results were reviewed and corrected as of January 19, 1979. The IE inspector reviewed file No. A820QR which contained Cadwelder Qualification Reports and observed that the reports had been signed by Level II QC inspectors. The IE inspector also reviewed B&R interoffice letter SQA-407 which stated that all lead inspectors are responsible to assure that QA records documenting inspection and/or test results are evaluated and reported by Level II personnel. This matter is considered resolved.

(Open) Unresolved Item (50-498/78-18; 50-499/78-18): In-place Storage of Equipment. The IE inspector observed that a heated enclosure had been erected around the two Charging Pumps and the Positive Displacement Pump located in the Unit 1 Mechanical Electrical Auxiliary Building. The interior space was warm and dry and appeared to afford adequate protection for the enclosed equipment.

The IE inspector reviewed a B&R memo, dated February 14, 1979, which stated that construction engineering personnel were reviewing and correcting all safety related WMC/ERC cards issued to date. A quality engineering task force is reviewing all corrected cards as well as "accepted as uncorrected" cards. QC will review field activities and records against the corrected cards. Task force efforts are expected to be completed by March 28, 1979. The B&R memo also stated that a procedure delineating safety related warehouse and in-place maintenance requirements is being prepared and is expected to be issued in April 1979. (see paragraph 4.a for related findings)

This item will remain open pending completion of actions described in the B&R memo of February 14, 1979.

### 3. Site Tour

The IE inspectors walked through various areas of the site to observe construction activities in progress and to inspect house-keeping and equipment storage.

During the tour through the Level D laydown storage area, the IE inspector observed that a carbon steel band securing a 29" ID pipe assembly (identified as loop 3 RV/SG, SN13945) to its shipping skid was in contact with the stainless steel pipe. Rust stains from the band were observed on the pipe. This is contrary to the requirements of Westinghouse Manual, "NSSS Component Receiving and Storage Criteria," which states that stainless steel material must not be in contact with carbon steel.

During the tour in the vicinity of the Unit 1 Reactor Containment Building, the IE inspector observed several instances where reinforcing steel in a laydown area was in contact with the earth and one instance where vehicle traffic had caused displacement of soil which partially covered the reinforcing steel. This is contrary to Procedure CCP-3, paragraph 3.10 which states that all material will be stored elevated off the ground.

The IE inspector informed the licensee that the above items are considered to be two examples of an item of noncompliance with the requirements of Criterion V of Appendix B to 10 CFR 50.

### 4. Electrical Components and Systems

#### a. Review of Procedures and Records

The IE inspector reviewed the following procedures and records pertaining to the receiving and storage of Class IE cable and electrical equipment:

A040KPMCP-3, Rev. 4, November 21, 1978, "Handling, Storage, Installation and Maintenance of Permanent Nuclear Equipment"

A040KPECP-2, Rev. 0, January 8, 1979, "Meggering"

Purchase Orders (P.O.) No. 35-1197-4046, 35-1197-4067 and 35-1197-4058

Receiving Inspection Reports (RIR) No. 701, 701A, 336, 336A, 1139, 1139A, 113, 143, 143A, 1712, 1712A and 283

Nonconformance Reports (NCR) No. SG 947, 1940, 1941 and SE 1137

Maintenance Records (WMC and ERC) for motors 2R171NPA101A and B, 2R161NPA101C and THXCIAPCS-02

All of the above procedures and records were found to conform with the requirements of 10 CFR 50, Appendix B and ANSI 45.2.2 with the exception of the maintenance records. The IE inspector identified several areas where the maintenance being performed did not agree with the manufacturer's recommendation as required by MCP-3, paragraph 3.1.2.2. The IE inspector was informed by the licensee representative that these discrepancies had previously been recognized by them and this matter was an unresolved item documented in NRC Inspection Report 78-18. The IE inspector reviewed B&R memo ST-BC-HS-02346, dated February 14, 1979, "Storage and Maintenance of Equipment." B&R now has a complete review of all maintenance and storage requirements for all equipment in progress. This review is to be completed and all corrective action implemented by April 30, 1979.

This item of concern will be considered as a part of the unresolved item relating to storage of permanent plant equipment documented in NRC Inspection Report 78-18.

b. Storage of Class IE Equipment

The IE inspector inspected areas of electrical equipment storage in the warehouse, laydown yard and in place. The cable tray and cable storage areas and warehouse storage areas were clean and all material inspected was properly identified and separated as required. The Residual Heat Removal (RHR) Pump Motors were found to be wet. The IE inspector was informed that NCR SE 1137 had been written against these motors on February 13, 1979. The disposition of the NCR was still being reviewed by B&R engineering. RHR motors B and C are out of tolerance on megger reading due to the moisture. The licensee informed the IE inspector that the disposition of the NCR would include both maintenance required to dry out the motor insulation and preventative measures to keep the motors dry in the future. This is also included in the review of storage and maintenance being conducted by B&R per B&R memo ST-BC-HS-02346, dated February 14, 1979.

No items of noncompliance or deviations were identified.

5. Review of Items Reported Under 50.55(e)

The IE inspector reviewed the status of action taken to repair voids in lift fifteen of the Unit 1 Reactor Containment Building (RCB) shell initially reported to the NRC on October 20, 1978.

Brown and Root has issued Technical Reference Document (TRD) 2C801CQ002-E, "R. C. Bldg. 1 Shell Lift 15, Investigation and Repair Criteria," which details the engineering requirements for investigation and repair of the void areas. Exploratory drilling, sounding, and visual examination of holes using fiber optics were the primary methods used to determine the extent and location of unacceptable areas. Repairs will be accomplished by injection of grout into the voids through holes drilled in the polar crane brackets and the containment liner. The TRD specifies the use of Masterflow 814 cable grout with a 28-day strength of 5000 psi. Flow cone tests and compressive strength tests were specified.

The IE inspector observed preparations being made for grouting including injection of water into and flushing of voids in the areas of crane brackets at 170° and 185° orientations. A work platform was erected on the top of the RCB wall at a buttress location. On the work platform were located grout mixers with an injection pump, an ice water batcher, a supply of ice and a supply of grout. The work platform provided work space for approximately ten personnel. Work platforms at the bracket areas provided access to the areas for monitoring and control of water and grout injections.

No items of noncompliance or deviations were identified.

6. Review of NSSS Storage Procedures

The IE inspector reviewed the shipping, handling and storage procedures as prepared by Westinghouse for NSSS equipment. During this inspection, procedures were reviewed for the reactor vessel, pressurizer, steam generators and lower reactor vessel internals. The maintenance records for the required periodic inspections of these components were also inspected. Section 2-5 of the manual, "NSSS Component Receiving and Storage Criteria," states that an initial dimensional inspection of the lower reactor vessel internals should be performed at the beginning of the horizontal storage period. After approximately one month of storage, a second inspection was to have been performed in accordance with the same procedure followed by another inspection after two more months of storage. If there were no dimensional changes, the inspection frequency could be extended to a longer period with the concurrence of the Westinghouse Site Manager and the cognizant Core Support engineer.

During this inspection, it was determined that the equipment was received March 8, 1978, and the original inspection was performed on April 14, 1978. The first follow-up inspection occurred on June 7, 1978, or after an interval of almost two months. Subsequent inspections were performed on August 31, 1978, and December 10, 1978, with the next inspection scheduled to be on March 10, 1978. The Westinghouse Site Manager was unaware of this extended inspection interval and had not concurred with the extension. After having been informed of this inconsistency in inspection dates and noting that there were no significant changes in the dimensions, the Westinghouse Site Manager verbally acknowledged that he would issue to HL&P a letter waiving the requirement for the one month reinspection as allowed by Section 2-5.

Since no damage to the equipment was experienced and the subsequent inspections have been performed as stated, this will be considered as an unresolved item pending issuance of the above waiver.

During this review of the "NSSS Component Receiving and Storage Criteria" manual, the IE inspector noted that Section 3.3 for the reactor vessel, including head and closure hardware, contained criteria only for short-term storage (less than six months). Under the heading for long-term storage (greater than six months), it is stated that, "At the present time these procedures are being developed. Supplemental sheets will be issued covering receipt and periodic inspection requirements." This equipment was received on site July 6, 1978, and has been maintained in accordance with the short-term storage instructions for the succeeding seven months. Since the equipment will remain in storage for an estimated three additional months, long-term storage requirements should be defined or the acceptability of the short-term requirements for the forecasted storage period affirmed by the vendor. This item will be considered unresolved pending review of long-term storage requirements.

#### 7. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, items of noncompliance, or deviations. Two unresolved items disclosed during the inspection are discussed in paragraph 6.



8. Exit Interview

The IE inspectors met with licensee representatives (denoted in paragraph 1) at the conclusion of the inspection on February 23, 1979. The IE inspectors summarized the purpose and the scope of the inspection and the findings. A licensee representative acknowledged the statements of the IE inspectors concerning the item of noncompliance and the unresolved items.