

APPENDIX A

NOTICE OF VIOLATION

Public Service Electric and Gas Company  
Hope Creek Generating Station

Docket No. 50-354  
License No. CPPR-120

As a result of the inspection conducted on December 1, 1985 - January 12, 1986, and in accordance with NRC Enforcement Policy (10 CFR 2, Appendix C), the following violations were identified:

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

Startup Administrative Procedure 24 (SAP-24), Revision 10, states that changes in testing sequence, excluding testing sequence changes allowed in the test procedure, require use of a Change Notice (CN) or On-The-Spot-Change (OTS). SAP-24 states that retesting is required when maintenance or modification has been performed on equipment whose operation is an acceptance criterion, and that this retesting shall be referenced on the Test Endorsement Record and performed using CN/OTS procedures. SAP-24 requires Quality Assurance approval of test changes which add, delete or alter a QC Mandatory Witness Point (MWP).

Contrary to the above, during performance of Preoperational Test Procedure PTB-AB-1, Revision 0 (Main Steam System) on December 12, 1985, the test sequence was changed, retesting was performed, and Quality Control Mandatory Witness Points were deleted without proper documentation and approval as required by Startup Administrative Procedure 24.

This is Severity Level IV violation (Supplement II)

- B. 10 CFR 50, Appendix B, Criterion V requires that activities affecting quality be accomplished in accordance with documented instructions, procedures or drawings. Listed below are examples of failure to follow procedures for conducting quality control inspections:

1. Bechtel Quality Control Instruction 10855/P-1.10, Revision 8, Piping Subassembly Fabrication, Installation and Rework, requires inspection of completed piping system component installation or rework to verify its compliance with applicable design criteria.

Contrary to the above, on November 3, 1985, a non-quality bolt was observed within the quality boundary of the core spray system in the core spray pump D discharge flange. Final Quality Control inspection had been completed on September 5, 1985 and had not identified the discrepancy.

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2. Bechtel Quality Control Instruction 10855/P-2.10, Revision 12, Inspection of Pipe Support Installation, requires inspection of completed pipe supports to verify proper staking.

Contrary to the above;

- a. On December 12, 1985 retaining pins on Main Steam Line Snubber 1-AB-031-H04(Q) were observed to have not been properly installed. The Final Quality Control inspection had been completed and approved without exception on October 23, 1985.
- b. On December 14, 1985 required retaining clips on support 1-P-EG-173-H44(Q) in the auxiliary safety coding system had not been installed. Final Quality Control inspection had been completed and approved without exception on June 13, 1985.

This is a Severity Level IV violation (Supplement II).

Pursuant to the provisions of 10 CFR 2.201, Public Service Electric & Gas Company is hereby required to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.