

APPENDIX A

NOTICE OF VIOLATION

GPU Nuclear Corporation
Oyster Creek Nuclear Generating Station

Docket No. 50-219
License No. DPR-16

As a result of the inspection conducted on October 21 - December 1, 1985, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), published in the Federal Register on March 8, 1984 (49 FR 8583), the following violations were identified:

- A. 10 CFR 50, Appendix B, Criterion IX and Section 6 of the Oyster Creek Operation Quality Assurance Plan require, in part, that special processes, such as welding, be accomplished in accordance with applicable codes and that procedures be established to meet the requirements of the applicable codes. The applicable code for structural welding is AWS D1.1.

Contrary to the above, as of November 6, 1985, it was identified that the GPUN welding program did not address the requirements of AWS D1.1 Structural Welding Code regarding partial and full penetration structural welds.

This is a Severity Level IV Violation (Supplement I).

- B. 10 CFR 50, Appendix B, Criterion III and Section 4 of the Oyster Creek Operation Quality Assurance Plan require, in part, that design requirements be correctly translated into specifications, drawings, procedures, and instructions. Further, 10 CFR 50, Appendix B, Criterion V and Section 3 of the Operation QA Plan require, in part, that activities affecting quality be accomplished in accordance with procedures.

Attachment 1 to GPUN Standard MTWA-001, GPU System Welding Program, and paragraph 4.2 of procedure 6150-QAP-7220.01, GPUNC Welding Manual, require, in part, that Technical Functions Engineering specify weld joint configurations in appropriate procedures and drawings.

Contrary to the above, as of October 26, 1985, Technical Functions issued FCR-C-039642 to GPUN Drawings SN 15081.02-ES-04 and ES-05 specifying that structural steel pieces be joined together using a partial penetration weld. No information was specified on the FCR as to the weld joint configuration required to achieve the design strength. This omission resulted in inadequate welds being made in the field.

This is a Severity Level IV Violation (Supplement I).

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- C. 10 CFR 50, Appendix B, Criterion V and Section 3 of the Oyster Creek Operation Quality Assurance Plan require, in part, that activities affecting quality be prescribed by and accomplished in accordance with documented instructions, procedures, and drawings.

Contrary to the above, as of November 6, 1985, the following inadequacies existed regarding modifications to Instrument Racks RK01 and RK02:

- (1) QC inspection personnel failed in eleven instances to fully document their inspection activities on inspection reports in sufficient detail to show that inspection objectives had been met, as required by GPUN procedure 6130-QAP-7210.03, Exhibit #6, QA Mod/Ops Inspection Program.
- (2) Maintenance, Construction and Facilities (MCF) failed to follow the fabrication requirements of drawings SN 15081.02-ES-04 and ES-05 as evidenced by: (a) substitution of a seal weld for a partial penetration weld in six separate locations; (b) the use of a bearing connection in lieu of a friction connection for four pieces of bolted structural steel; (c) inadequate bolting including lack of full thread engagement of nuts and bolts, and failure to use washers where specified; and (d) the use of undersized fillet welds to attach a stiffener plate. Also, MCF failed to properly install the 3-valve manifold associated with level indicator LI-622-916 on RK01. It was installed upside down, contrary to the requirements of drawing 15081.02-CC-13, Rev. 0, Instrument Rack RK01 Phase I Modification Piping Schematic.
- (3) A MCF Job Supervisor failed to sign off production hold points on the Weld Repair Record associated with MNCR 85-233 and Short Form 31529 as required by paragraph 4.2 of Exhibit 4 of GPUN procedure 6150-QAP-7220.05, Rev. 0-00.
- (4) MCF failed to implement prerequisite 4.7.3 in GPUN procedure A15B-G1136.010, Rev. 0, RK01 Rack Modifications-Electrical. An emergency Technical Specification change provided the option of either implementing or revising this procedure prerequisite, but neither action was taken.

This is a Severity Level IV Violation (Supplement I).

- D. 10 CFR 50, Appendix B, Criterion X, and Section 6 of the Oyster Creek Operation Quality Assurance Plan require, in part, that inspections be performed to verify conformance with documented instructions, procedures, and drawings.

Contrary to the above, as of November 6, 1985, QC inspections failed to identify the following deficiencies:

- (1) The undersized fillet welds discussed in paragraph C.(2)(d) of this Notice of Violation;

- (2) The inadequate partial penetration welds discussed in paragraphs B and C.(2)(a) of this Notice of Violation;
- (3) The inadequate bolting discussed in paragraph C.(2)(b) of this Notice of Violation; and
- (4) The upside down 3-valve manifold discussed in the second paragraph of C.(2) of this Notice of Violation.

This is a Severity Level IV Violation (Supplement I).

- E. Technical Specification 6.8.1 requires, in part, that written procedures be established, implemented, and maintained. Paragraph 7.2 of procedure number 915.26, Rev. 2, Release Surveys, contained in the Oyster Creek Radiological Controls Policy and Procedure Manual, requires that all personal items, such as clipboards, drawings, notebooks, etc., be radiologically surveyed prior to release of these items from the radiation control area (RCA).

Contrary to the above, on November 6, 1985, personnel were observed leaving the RCA without performing a radiological survey of carry-along items.

This is a Severity Level IV Violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, GPU Nuclear Corporation is hereby required to submit to this office, within 30 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 the 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.