



**PUBLIC
SERVICE
INDIANA**

May 24, 1983
SVP-0027-83

Mr. James G. Keppler
Regional Administrator
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Docket Nos.: STN 50-546
STN 50-547
Construction Permit Nos.:
CPPR-170
CPPR-171

Marble Hill Nuclear Generating Station - Units 1 & 2

Dear Mr. Keppler:

This is in response to NRC Inspection Report Number 83-01, dated April 25, 1983. That report identified five noncompliances in the area of Safety related electrical work, and directed Public Service Company of Indiana, Inc. (PSI) to address the resulting Notice of Violations set out in the Appendix of the Inspection Report.

The following addresses the noncompliances identified in the Notice of Violations as requested by the Inspection Report.

VIOLATION:

- A. 10 CFR 50, Appendix B, Criterion III, states, in part, "Measures shall be established to assure that applicable regulatory requirements and the design basis,...are correctly translated into specifications, drawings, procedures, and instructions...Design control measures shall be applied to items such as...delineation of acceptance criteria for inspections and tests."

Marble Hill Quality Assurance Manual, Section 5, Revision 6, Paragraph 5.2, states, in part, "Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished. Acceptance criteria shall be established by engineering drawings, design specifications, applicable codes and standards, and approved procedures."

Contrary to the above:

1. Procedure QCP-C2, Revision 6, does not address the inspection requirements for Seismic Category I, non-safety related, cable tray to hanger attachments and cable tray splice plate bolting in accordance with U.S. Nuclear Regulatory Commission Regulatory Guide 1.29.

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2. Procedure CWP-C6C, Revision 2, does not address the requirement for determining the minimum sheave size to be utilized during cable pulling operations so as not to exceed the minimum bend radius and maximum sidewall pressure of Class IE electrical cables in accordance with the project specifications and IEEE requirements.

a) Corrective Action and Results Achieved:

Item 1

Public Service Indiana halted installation activities of Cable Tray and Cable Tray Hangers performed by the Electrical Contractor. All "Seismic Category I, non-safety related, cable tray to hanger attachments and cable tray splice plate bolting" are identified as safety related on the Design Drawings. Therefore, these items were and will be installed and inspected as Safety Related.

Item 2

As of this date, no Class IE electrical cable pulling operations have been performed by the Electrical Contractor.

b) Corrective Action Taken to Avoid Further Non-Compliance:

Item 1 & 2

To date, no item of non-compliance exists. However, the Electrical Contractor has, or will, revise the Installation and Inspection Procedure(s) to address the NRC Inspector's comments and to include any specifications, code and standard requirements not previously addressed.

c) Date When Full Compliance Will Be Achieved:

Item 1 & 2 - June 30, 1983

VIOLATION:

- B. 10 CFR 50, Appendix B, Criterion V, states, in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings,...and shall be accomplished in accordance with these instructions, procedures, or drawings".

Marble Hill Project Quality Assurance Manual, Section 10, Revision 9, Paragraph 10.2.1, states, "Procedures shall be established and effectively implemented for the inspection and surveillance of activities and items affecting quality to verify conformance to approved instructions, procedures, specifications, and drawings".

Contrary to the above:

1. For hanger E-O-3051H028, the Quality Control inspector failed to verify material traceability and failed to verify that the hanger was installed per design documents in accordance with procedure QWP-C42.
2. For hanger E-O-3051H028, the Field Engineer failed to review work activities for completeness (i.e., fit-up, auxiliary steel partial and final welds, and hanger location) as required by procedure QWP-C42.
3. For hanger E-O-3051H028, the Welding Engineer failed to signify acceptance of auxiliary steel partial and final welds as required by procedure QWP-C42.
4. For hanger E-O-3051H028, the Area Manager, Area Engineer and Quality Control Inspection Supervisor failed to verify that all work and inspection activities were completed prior to signing-off the Electrical Installation Traveler as required by procedure QWP-C42.

a) Corrective Action and Results Achieved:

Public Service Indiana halted installation of Cable Tray Hangers and Auxiliary Steel performed by the Electrical Contractor. The Electrical Contractor initiated two (2) Nonconformance Reports to identify and correct all discrepancies on completed and partially completed travelers.

b) Corrective Action Taken to Avoid Further Non-Compliance:

The Electrical Contractor has revised the "Electrical Installation Traveler Procedure" which assures proper completion and documentation of Installation and Inspection activities. Formal training will be given to all personnel performing work associated with the procedure.

All completed and partially completed travelers with open items have been, or will be, converted into the system described in "Electrical Installation Traveler Procedure."

c) Date When Full Compliance Will Be Achieved:

August 31, 1983

VIOLATION:

- C. 10 CFR 50, Appendix B, Criterion XIV, states, in part, "Measures shall be established to indicate,...the status of inspections and tests performed upon individual items of the nuclear power plant.... These measures shall provide for the identification of items which have satisfactorily passed all required inspection and tests,...to preclude inadvertant bypassing of such inspections and tests".

Marble Hill Project Quality Assurance Manual, Section 14, Revision 7, paragraph 14.2.2, states, "Contractors and Suppliers shall establish measures to indicate, by use of stamps, tags, labels, routing cards, or other suitable means, the status of inspection and tests performed on structures, systems, or components. These measures provide for the identification of items which have satisfactorily passed required inspections and tests, and include provisions to preclude inadvertent bypassing of such inspections and tests".

Contrary to the above, the licensee's electrical contractor was not maintaining the status of inspections and tests performed on cable tray hangers. Specifically, hanger documentation packages presented to the Region III inspectors as being complete were in fact missing inspections and included open nonconformance reports (NCRs). When these facts were presented to the PSI Electrical Quality Engineering Manager, he stated that none of the electrical cable raceway hangers had been fully accepted. When queried, he also stated that the electrical contractor did not maintain a status system or a punch list that would indicate inspections and tests to be performed or the inspection and tests that had been accepted.

a) Corrective Action and Results Achieved:

Public Service Indiana halted installation activities of Cable Tray Hangers performed by the Electrical Contractor. "The Electrical Installation Traveler Procedure" has been revised to include a mechanism to maintain a status of inspections, tests, and Nonconformances related to cable tray hanger installation.

b) Corrective Action Taken to Avoid Further Non-Compliance:

All existing and future cable tray hanger work will be statused via the "Electrical Installation Traveler Procedure".

c) Date When Full Compliance Will Be Achieved:

May 31, 1983

VIOLATION:

- D. 10 CFR 50, Appendix B, Criterion XV, states, in part, "Measures shall be established to control materials, parts, or components which do not conform to requirements in order to prevent their inadvertent use or installation".

Marble Hill Project Quality Assurance Manual, Section 14, Revision 7, paragraphs 14.2.3 and 14.2.1, states, in part, "PSI requires that Contractors and Suppliers establish measures which include that the

status of nonconforming, inoperative, or malfunctioning structures, systems, or components is clearly identified to prevent inadvertant use. When tagging is not practical, marking or segregation shall be employed to assure identification and to prevent inadvertant use. Tags shall be in plain view and attached to either the materials or items, or its container".

Contrary to the above, nonconforming items identified on Nonconformance Reports (NCRs) 210, 233, 277, 331, 392, 396, 1294, 1344, 1377, and 1379 were not controlled by tagging, marking or segregation to prevent their inadvertant use or installation.

a) Corrective Action and Results Achieved:

Public Service Indiana halted all Safety-Related activities performed by the Electrical Contractor. All open Nonconformance Reports were reviewed and items affected were verified to assure control via tagging, segregation, and/or marking to prevent inadvertant use. All items that were not properly controlled were corrected during the verification process.

b) Corrective Action Taken to Avoid Further Non-Compliance:

The Electrical Contractor's Nonconformance procedure was revised to provide for clarity as to the control of nonconforming material, parts, and components. The Electrical Contractor's personnel have received formal training to the revised nonconformance procedure.

c) Date When Full Compliance Will Be Achieved:

May 31, 1983

VIOLATION:

- E. 10 CFR 50, Appendix B, Criterion XVI, states, in part, "Measures shall be established to assure that conditions adverse to quality,...are promptly identified and corrected".

Marble Hill Project Quality Assurance Manual, Section 15, Revision 9, paragraph 15.3.8, states, in part, "Nonconformance Reports are tracked to assure appropriate action in a timely manner". Paragraph 16.1.1 of Section 16, Revision 8, states in part; "It (this section) describes the documented measures utilized to assure that significant conditions adverse to quality are promptly identified and corrected with actions taken to preclude repetition".



Contrary to the above, the licensee and the electrical contractor failed to take prompt corrective action to resolve material traceability problems identified in April, 1982 on MCAR003. The material traceability problems have been transferred from a Management Corrective Action Report (MCAR) to an NCR to an MCAR to an NCR, etc. The material traceability problems still existed on January 29, 1983.

a) Corrective Action and Results Achieved:

Public Service Indiana halted all Safety Related activities performed by the Electrical Contractor. The Electrical Contractor has statused documents which identify conditions adverse to quality and has assigned responsible individuals to assure prompt corrective action is taken.

b) Corrective Action Taken to Avoid Further Non-Compliance:

The Electrical Contractor will develop a procedure for tracking and statusing documents which identify conditions adverse to quality to assure prompt corrective action and timely implementation.

c) Date When Full Compliance Will Be Achieved:

July 31, 1983

If you have any questions regarding this matter, please contact me at your convenience.

Sincerely,

A handwritten signature in cursive script, appearing to read 'S. W. Shields'.

S. W. Shields

SWS/CGB/pao

cc: J.E. Konklin
J.F. Schapker