

## APPENDIX A

Bechtel Power Corporation  
Docket No. 99900519/85-01

### NOTICE OF NONCONFORMANCE

Based on the results of an NRC inspection conducted on January 7-11, 1985, it appears that certain of your activities were not conducted in accordance with NRC requirements.

Criterion V of Appendix B to 10 CFR Part 50 states: "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

Nonconformances with these requirements are as follows:

- A. Part 2, Section 4.2 of Bechtel Engineering Department Project Instruction EDPI-4.58-01, "Specifying and Reviewing Supplier Engineering and Quality Verification Documentation," Revision 4, dated September 18, 1981, states, in part, "When reviewing calculations or test results, the responsible engineer shall...Evaluate testing techniques and review results if Supplier is qualifying equipment by test."

Contrary to the above, the responsible engineer approved the design test documentation provided by the supplier of the Battery Chargers, purchase order E-051, which did not meet all the requirements of the industrial standard referenced in the specification. In particular, the requirements of National Electrical Manufacturers Association (NEMA) Standard PV-5-1976 for the A-C and D-C transient voltage withstandability tests were not completely met.

- B. Section 2.0 of Bechtel Engineering Department Procedure EDP-4.54, "Qualification of Personnel Authorized to Perform ASME III Code Certifying Activities," Revision 0, dated July 29, 1983, states, in part, "It is the responsibility of those individuals selected for certification activities to provide their Chief Engineer evidence of the qualifications to meet the requirements of Exhibit A. Records of basic education and continuing qualifying experience are maintained by the Chief Engineer."

Section 3.3, "Review" of EDP-4.54, states, in part, "To maintain qualification, the selected employee shall keep current on knowledge of code requirements and continue professional development in the specialty field through personal study and experience or by attendance at appropriate courses, seminars, society and technical committee meetings. The personnel files of the selected employee must contain evidence that demonstrates maintenance of qualifications."

Contrary to the above, no objective evidence could be produced in either the Chief Engineer or personnel files, except for a resume, to support the qualification and maintenance of qualification of two Registered Professional Engineers engaged in ASME certification activities.

- C. Section 3.2(b) of Bechtel EDPI 4.58-01, "Specifying and Reviewing Supplier Engineering and Quality Verification Documentation," Revision 4, dated September 18, 1981, states, in part, that "Documents reviewed shall assure that equipment is capable of fulfilling its function and that documents conform to purchase specification requirements."

Contrary to the above, the Seismic Analysis Report, Bechtel No. C-175-0014, prepared by Wachter Associates Incorporated for Spent Fuel Storage Racks, utilized a damping value, which was provided by Bechtel, of 5% rather than the specification value of 4%. Documentation was not available to support the basis for this departure.