

NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted on June 4-6, 1979, it appears that certain of your activities were not conducted in accordance with NRC requirements.

Criterion V of Appendix B to 10 CFR 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." Deviations from these requirements are as follows:

- A. Quality Assurance Procedure 18.2, paragraph 4.1 states, "Quality Assurance audits shall be conducted by supervisory, management or trained personnel having no direct responsibility in the area."

Contrary to the above, the Tulsa Plant QA Manager conducted plant internal audits March 14, 1979, including areas for which he has direct organizational responsibility.

- B. Quality Assurance procedure 18.2 states in part, ". . . the results of customer quality audits or surveys will be considered to be part of the internal QA audit program since these audits are performed with Gould personnel and serve to verify compliance to quality assurance program requirements . . . ."

The established practice is for Gould audit personnel to accompany the audit team and complete a separate mini audit while the customer audit is being conducted. The mini audits in conjunction with the customer audits, being considered part of the internal QA program, must be documented.

Contrary to the above, whereas the plant audit files indicated customer audits had been conducted, the plant internal audit files did not show that Gould internal audits were conducted in conjunction with the customer audits on the following dates; March 29, 1978; April 4, 1978; April 13, 1978; April 25, 1978; May 17, 1978; March 21, 1979; April 4, 1979; and May 8, 1979.

- C. Paragraph 3.6.4 of Quality Assurance Procedure 7.1T Revision 0, dated June 10, 1978, states, "A copy of the completed IR is retained in Receiving Inspection. The IR is then forwarded to purchasing for disposition. Defects are recorded on the Quality Control Record Card."

1177 286

7910180 243

Contrary to the above requirements, defects described on completed IR (Inspection Report) No. 50051, dated 5-11-79, were not recorded on the Quality Control Record Card.

- D. Paragraph 3.1.2.3 of Quality Assurance Procedure 12.1, Revision 0, dated June 23, 1978, states in part, "Calibration Records: A calibration record and repair card of each gage or fixture, or fixture in the calibration cycle system will be kept on file by Quality Assurance . . . ."

Contrary to the above requirements, a calibration record and repair card did not exist for a 5KV and a 15KV test fixture.

1177 287