Pittsburgh-Des Moines Steel Company Docket No. 99900109/79-01

NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted on May 21-25, 1979, it appeared that certain of your activities were not conducted in full compliance with NRC requirements as indicated below:

A. Criterion V of Appendix B to 10 CFR 50 states in part, "Activities affecting quality shall be prescribed by documented instructions . . . and shall be accomplished in accordance with these instructions."

Pictsburgh-Des Moines (PDM's) corporate QA manual, Section 7, Subsection 7.1, Fabrication Check List (FCL), states, "Upon receipt of drawings from the Plant Drawing Controller, Plant Planners shall determine the sequence of manufacturing steps necessary to produce the final shipping piece as specified on the detail drawing. These manufacturing steps shall be written on the Fabrication Check List (FCL)."

Contrary to the above, an FCL listing manufacturing steps necessary to produce personnel air lock No. 303L had not been prepared (an FCL was prepared and presented to the inspector on May 23, 1979).

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

PDM's corporate QA manual, Subsection 13.5, Control of Measuring and Testing Equipment, subparagraph 13.5.2 states in part, "Each piece of equipment shall be identified by a serial number. A tag or label shall be affixed to each piece of equipment or container showing the date of calibration and the date when the next calibration is due."

In a lattion, PDM's calibration procedure CP-1, paragraph 1.4.1.2 requires each piece of measuring or test equipment to be identified with a calibration sticker.

Contrary to the above, calibration stickers were not attached to the two (2) temperature - pressure recorders, Nos. 726-EB-OY, and 808-FB-O2 used for documenting the temperature and pressure during the overpressure test of personnel air lock No. 303L.

C. Criterion V of Appendix B to 10 CFR 50 states in part, "Activities affecting quality shall be prescribed by documented instructions . . . and shall be accomplished in accordance with these instructions."

In addition PDM's Corporate QA manual, paragraph 3.5, Procedures and Specifications, subparagraph 3.5.1.1 states in part, "The Engineering Instruction Specification (EIS) shall be the primary document specifying engineering requirements and referencing engineering documents."

Subparagraph 5.2.1 states in part, "The purchasing Department shall prepare and issue Purchase Orders in accordance with the requirements delineated on Advance Bills, Change Order Sheets, Material Bills and Procurement Specifications that are received from Drafting."

Contrary to the above, the customers specification requirement for the insulation of all power and control wiring installed in the personnel air lock No. 303L (to be qualified by passing the vertical flame resistance test as prescribed by IEEE-383-74) had not been identified in the Material Bills and Procurement Specifications or the EIS received by the Purchasing Department from Drafting. Therefore, the customer's flame resistance test requirements were not included in PDM's purchase order for the procurement of the power and control wire to be used in air lock No. 303L.

D. Criterion V of Appendix B to 10 CFR 50 states in part, "Activities affecting quality shall be prescribed by documented instructions . . . and shall be accomplished in accordance with these instructions."

PDM's Appendix A to the corporate QA manual, Paragraph 5.12, QA Monitoring, states, "The QA Documentation Clerk shall monitor the activities of the Purchasing Checkers at least twice a month. A record of this monitoring shall be sent to the Division QA Manager and Purchasing Manager."

Contrary to the above, the QA Documentation Clerk is not documenting his monitoring of the activities of the Purchasing Checkers.