

NOTICE OF DEVIATION

Based on results of an NRC inspection conducted on August 20-24, 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. Procedures, Fuel Pellet Final Inspection (MK-C), QC-930, Revision 1, and Inspection of Resintered Fuel Pellets, QC-935, Revision 1, paragraphs 6.5 and 3.1 respectively require that the certification sample and the resinter sample both be selected from the "lot master sample" for that lot.

Contrary to the above, the certification sample data of dimensional characteristics of a recent lot was found to be significantly different from the same lot's initial data for the resintering sample. This demonstrates that the samples were not selected from the same "lot master sample" (See Details, C.3.c.(1)).

- B. Procedure, Fuel Pellet Sample Selection, for Lot Certification Testing MKB or MKC, QC-929, Revision 1, paragraph 4.2.2, requires that sampling shall be on every 5th tray for normal sized lots.

Contrary to the above, the following sampling frequencies were observed for two normal sized lots. On lot 23 of project 27A-2 from the 1672 trays produced, a lot master sample of 299 pellets were selected, when 334 pellets should have been selected. On lot 24 from the 585 trays produced at the time of inspection, a lot master sample of 108 pellets had been drawn, when 117 pellets should have been selected (See Details, C.3.c.(2)).

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