

NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted on September 10-14, 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. WPPSS Project Procedure No. 33 (Change Order Procedure) states in part, paragraph 4.1.3, "The Cognizant Engineer will prepare a Material Requisition (Form 4058) signed by the SDE and approved by Project Engineering Management requesting Contract Administration initiate a particular change." Also, WPPSS Project Procedure No. 5 (Specifications) states in part, paragraph 7.5.1.4, "A record copy of the Specification Approval Form shall be filed with Document Control."

Contrary to the above, the Material Requisition (No. 228928) for change No. 2 on contract #40 (Butterfly Valves & Operators) was not approved by Project Engineering Management. Also, contrary to the above, no record copy of the Specification Approval Form for revision No. 2 of Specification 9779-113 (Emergency Power Sequencing Subsystem) was filed with Document Control.

- B. UE&C QA Manual for Seabrook Station, Procedure QA-17, QA Records (which lists quality records and their retention location and time), requires Vendor Nonconformance Reports to be retained as permanent quality records as part of Vendor Manufacturing Records stored in the site Construction Office Building.

Contrary to the above, Vendor Nonconformance Reports ("Use as is" and "Repair") for this project are not retained as part of Vendor Manufacturing Records stored in the site Construction Office Building. There is no requirement in the Purchase Orders examined for this project for the vendor to include nonconformances in the Data Packages (Vendor Manufacturing Records) sent to the site, and the final vendor Data Packages examined did not include vendor nonconformances reports.

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