

NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted on August 27 - September 3, 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. The Hirata Valve Industry Co. Ltd. (HV) corrective action response letter of April 12, 1979, states in part with respect to Item D of Inspection Report No. 79-01, ". . . b. The WPS and CMTR of welding materials used for the repair, were received and accepted by us, and the vendor's statement requesting a correction of the WPS No. shown on the applicable Weld Repair Records, were also attached to each of the records."

Contrary to the above, the vendor's statement requesting a correction of the WPS No. shown on Weld Repair Record (WRR) 7-1037A, was not attached to the WRR. This WRR was applicable to the disc identified in Item D of Inspection Report No. 79-01.

- B. Paragraph 5.10.3 in Section 5 of the QA Manual states in part, "The Welding Group Foreman is responsible for assuring that welders comply with the WPS and DWP by checking that the Specification parameters are being maintained. . . ."

Contrary to the above, current checks performed by the Welding Group Foreman did not assure welder compliance with the WPS and DWP, as evidenced by the observation of travel speed and Tungsten electrode extension values being used in production hardsurfacing operations, that were in excess of those permitted by the applicable DWP (See Details, C.3.a.).

- C. Paragraphs NB/NC/ND - 5521(a) in the ASME Section III Code state in part, "Personnel performing nondestructive examinations shall be qualified in accordance with SNT-TC-1A"

Sub-paragraph 2 of paragraph 8.2.d. in SNT-TC-1A states with respect to the practical examination requirements for NDT level I and Level II

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personnel, "At least one selected specimen shall be tested, and the results of the test shall be analyzed by the person considered for certification." Sub-paragraph 3 of paragraph 8.2.d. states, "The description of the specimen, the test procedure, including check points, and the results of the examination shall be documented." Paragraph 8.6.4 states in part, ". . . Test objects shall be used in the practical examination, and at least 90% of the known indications should be found"

Contrary to the above, the documentation of the liquid penetrant practical examination administered to two (2) Level II personnel, did not contain either a description of the test specimen used, or the results with respect to percentage of known indications found.

- D. Paragraph 7.4.3 in specification NPS 0011 (Hirata Purchase Specification for Austenitic Stainless Steel Castings) states in part with respect to vendor radiographic methods, "The RT method shall accord with Hirata Procedure No. NAF-14, but shall be executed on the RT Detail Procedure that the supplier shall prepare and Hirata shall have approved"

Contrary to the above, Nippon Stainless Steel Co. Ltd. Detail Procedure, NS-C-I3061 Revision 1, was approved by Hirata Valve for use on Purchase Order No. 0019, although using a radiographic method that was not in accordance with Hirata Procedure No. NAF-14 requirements, with respect to penetrameter selection and allowed geometric unsharpness (See Details Section, E.3.a.(1)).

- E. Paragraph 3.4.2.1 in Section 3 of the QA Manual states in part with respect to Material and Service Document Checklists (MSD), "The MSD is used by the QE Section personnel to verify receipt and correctness of: . . . (b) Documentary evidence of performance and quality furnished by the vendor, including Certified Material Test Reports or Certificates of Compliance in accordance with the Code"

Contrary to the above, use of an MSD with respect to Certified Material Test Report (CMTR) No. 0163M did not verify the correctness of quality in accordance with the Code, in that the CMTR was accepted by Hirata Valve, although demonstrating that the vendor (Mitsubishi Steel Manufacturing Co. Ltd., Hirota Steel Works) had exceeded the postweld heat treatment qualification of the welding procedure used for performing casting weld repairs (See Details Section, E.3.a(2)).

- F. Paragraph 3.1.5 in Section 3 of the QA Manual states in part, "After completion of the survey, the assigned surveyors shall prepare and submit a written report with the completed Vendor Survey/Audit Checklist to the QA Manager. The report shall recommend one of the following

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. . . . (b) The vendor should make recommended corrections, and resurvey is required after the correction" Paragraph 3.1.6 states in part, "The QA Manager shall review the Report and approve or disapprove the vendor for listing on the Qualified Vendors List The List shall designate, for each vendor . . . product or services qualified to supply with any limitations"

Contrary to the above:

1. A resurvey of a currently listed qualified vendor (Mitsubishi Steel Manufacturing Co. Ltd., Hirota Steel Works) was not performed subsequent to identification of deficiencies in a March 25, 1978, survey, as evidenced by the absence of any written report relative to a resurvey and reidentification of some of the same deficiencies during the next scheduled annual survey performed on February 27, 1979.
2. The Qualified Vendors List did not designate required limitations on the use of this vendor, or Sumida Kogyo Co. Ltd., with respect to Charpy-V impact testing to be performed on the Hirata impact machine. (See Details Section, F.3.a.)