

NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted on August 21-24, 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. Section 3.2 to Policy No. QG-5.1 (Instructions, Procedures, and Drawings) of the Gaithersburg Power Division Nuclear Quality Assurance Manual states in part, "Design, procurement and construction activities shall be defined by and conducted according to written procedures. These procedures shall outline the personnel responsibilities, sequence of activities and methods used to assure that adequate controls are employed. The instructions, procedures and drawings shall be prepared, reviewed, approved and distributed prior to the start of the activity"

Contrary to the above, neither instructions nor procedures exist that prescribe Bechtel-Gaithersburg activities in the comparison and evaluation of as-built safety-related piping systems with respect to the input parameters used in the seismic analysis for Hatch Unit 2.

- B. Section 17A.1.3 of the PSAR for the SNUPPS Project states in part ". . . design changes, including field changes, are subjected to design control measures commensurate with those applied to the original design"

Contrary to the above, Revision 8 of the SNUPPS Project implementing Instruction No. EDPI - 4.49-01, entitled "Project Specifications", does not require that designs changes, including field changes, be subjected to design control measures commensurate with those applied to the original design.

- C. Section 17A. of the PSAR for the SNUPPS Project endorses ANSI N45.2.11 which states in Section 10, ". . . design documentation and records

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which provide evidence that the design and review process was performed in accordance with the requirements of this standard shall be collected, stored, and maintained in accordance with the requirements of ANSI N45.2.9. The documentation shall include not only the final documents such as drawings and specifications, and revisions thereto, but also the records of the important steps, including sources of design inputs, which support the final design"

Contrary to the above, SNUPPS Project implementing instructions do not require the retention of records for Bechtel generated design documents which document the following important steps in the design and review process:

1. The identity of the interfacing design groups that reviewed each document.
2. That design interface information resulting from such reviews was communicated to the group preparing or revising the document.
3. That such transmitted design interface information was incorporated into the document to the satisfaction of the reviewer.

- D. Revision 0 of Bechtel implementing procedure EDP-7.5, entitled "Engineering Document Signature and Initials Identification," states in part ". . . signatures and initials on engineering documents are reproducible, identifiable and unique to the individual signatory. . . ."

Contrary to the above, the signatures or initials on Revision 6 of Bechtel engineering document No. 10466-M-218A(Q) and Revision 0 of Bechtel engineering document No. 10466-M-637 (Q) were not reproducible.

- E. Revision 6 of SNUPPS Project implementing instruction EDPI-5.16-01, entitled "Supplier Document Control Procedure", states in part ". . . SDCC (Bechtel Project Supplier Document Control Center) . . . stamps the reproducibles with the SNUPPS Document Review Stamp"

Contrary to the above, Westinghouse supplied drawing No. 617 F 944 (SNUPPS Project Document No. 10466-M-705-005-02) did not exhibit the required SNUPPS Document Review Stamp.

- F. Concerning Revision 8 of SNUPPS Project implementing instruction EDPI-4.49-01, entitled "Project Specifications," the following requirements and deviations from these requirements were identified:

1. Paragraph 7.0 states in part, ". . . the typed original of the technical portion of the specification and appendices will be under the control of the project editor"

Contrary to the above, the typed originals of Revisions 0 thru 5 of the technical portion and/or appendices of SNUPPS Project Specification No. 10466-M-637 (Q) could not be located.

2. Paragraph 5.3 states in part, ". . . the group supervisor shall provide for the registered professional engineer seal(s) on all applicable specifications. . . ."

Contrary to the above, Revision 3 of SNUPPS Project Specification Nos. 10466-M-074 (Q) and 10466-M-081 (Q) did not exhibit the required registered professional engineer's signature or initials.

- G. Revision 12 of SNUPPS Project implementing instruction EDPI-4.46-01, entitled "Project Engineering Drawings," states in part, ". . . controlled drawing prints will be inserted in the group supervisor's/group leader's print file(s) by the administrative group. Superseded prints will be stamped "superseded""

Contrary to the above, superseded Revision 2 of SNUPPS Project Engineering Drawing No. 10466-E-01NG20 (Q) in the Mechanical/Electrical group controlled print files was not stamped "superseded."

- H. Revision 12 of SNUPPS Project implementing instruction EDPI-4.46-01, entitled "Project Engineering Drawings," states in part, ". . . the SNUPPS Project Engineering Document Release Log (See EDPI 5.30-01) provides a record of Bechtel project engineering drawings released/issued by the project"

Revision 8 of SNUPPS Project implementing instruction EDPI-4.49-01, entitled "Project Specifications," invokes the same requirement for project engineering specifications.

Contrary to the above, copies indicated as having been released/issued and distributed by the SNUPPS Project Engineering Document Release Log could not be located in the designated project files. Specific examples of drawings and specifications that could not be located in the project files, designated in EDPI-5.25-01 "Bechtel Master Distribution Schedule," are as follows:

1. Drawing No. 10466-M-OH1211(Q), Revision 1, dated February 25, 1977.
2. Drawing No. 10466-M-01AE01(Q), Revision D, dated October 25, 1977.
3. Drawing No. 10466-M-00AB(Q), Revision 3, dated March 7, 1978.
4. Drawing No. 10466-M-00AE(Q), Revision 4, dated October 25, 1977.
5. Specification No. 10466-M-637(Q), Revision 5, dated March 7, 1978.

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