Pullman Power Products
Docket No. 99900021/79-01

NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted on March 27-30, 1979, it appeared that certain of your activities were not conducted in full compliance with NRC requirements as indicated below:

A. Criterion XII of Appendix B to 10 CFR 50 states in part, "Measures shall be established to assure that . . . measuring . . . devices used in activities affecting quality are properly controlled, calibrated, and adjusted at specified periods to maintain accuracy within necessary limits."

Paragraph (c) in Sub-Article NCA-4134.12 of the ASME Section III Code states in part, "When discrepancies in measuring or testing equipment are found at calibration, the Certificate Holder shall determine what corrective action is required . . . ."

Contrary to the above, the current QA Program does not require a determination of corrective action need relative to discrepancies found during calibration of welding equipment measuring devices (See Details Section, C.3.a.).

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

Paragraph 9.3.2 in Section IX of the QA Manual states in part, "Welding Procedure Specifications acceptable for use on the item being fabricated are indicated on the WHR which accompanies the Traveler. The Welding Foreman will select the appropriate WPS from those indicated on the WHR and record the selected procedure and welder symbol in the appropriate column . . . ."

Note 14 on Drawing F-1, Job No. 8468, (Black Fox Unit 1, Main Steam System) states, "Min. Preheat 200°F Reqd. All Welds."

Contrary to the above:

1 The Welding Foreman did not select an appropriate WPS for Weld C in Job No. 8087, Drawing F 204, in that WPS (III-27) -27-111-8-0B-12, which was indicated on the WHR, was used to weld a 0.65 inch wall thickness, although only qualified for and permitting up to a maximum thickness of 0.308 inch to be welded.

2. Welding was observed being performed on Weld B in Job No. 8468, Drawing F-1, with an actual measured preheat temperature range of 98^{O} - 125^{O}F.