

NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted on April 24-27, 1979, it appeared that certain of your activities were not conducted in full compliance with your commitments as indicated below:

- A. Project procedures within the project organizations of the Power Engineering Division have identified various groups (e.g., Project Office, engineering disciplines, project engineers) as the groups responsible for the collection, storage, and maintenance of certain of the engineering QA records to be in accordance with ANSI Standard N45.2.9. 1/

Paragraph 5.3 of ANSI N45.2.9 states in part, "Prior to storage of records in a quality assurance record file, a written storage procedure shall be prepared.

Contrary to the above, written storage procedures have not been prepared, by the Power Engineering Division even though storage of quality assurance records is an on going process.

- B. ANSI N45.2.9, paragraph 5 states in part that provisions shall be provided, "governing access to and control of the (QA record) files." Further, it is stated that, "A full time security system shall be established to preclude the entry of unauthorized personnel into the storage area."

Contrary to the above, neither access control nor a record security system is provided for QA record files of procurement and design specifications and calculations, for either project in the Power Engineering Division.

1/ Through their respective Safety Analysis Reports, both active projects in Power Engineering Department are committed to the QA records program requirements of Regulatory Guide 1.88, which incorporates ANSI Standard N45.2.9.

- C. Paragraph 17.17.3 of Topical Report GAI-TR-106 states in part, "As a document becomes a record, . . . a legible copy is forwarded to the record retention center. A copy is retained within the division, thereby establishing duplicate storage."

Contrary to the above, documents that have become records (e.g., the files of internal audits) are being retained in the QA division files but copies have not been forwarded to the record retention center.

A similar requirement and deviation exists concerning QA records for which the Power Engineering Division is responsible.

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