

NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted on February 5-8, 1979, it appeared that certain of your activities were not conducted in full compliance with NRC requirements as indicated below:

- A. Criterion V of Appendix B to 10 CFR 50 states in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings"

The foregoing requirement is expanded in the Huico Corporate Quality Assurance Manual, Section 5.5.2, which states in part, ". . . dimensional inspection is performed in accordance with detailed written procedures developed by Engineering"

Contrary to the above, a documented detailed written procedure for the performance of the dimensional inspection of saddles used in pipe support assemblies was not available (See Details, paragraph C.3.c.).

- B. Criterion V of Appendix B to 10 CFR 50 states in part, "Activities affecting quality shall be prescribed by documented procedures,"

ASME Code Section IX, QW-201.1, states in part, "The welding procedure specification (WPS) shall cover details which are important to the production of sound welds. . . . The WPS is intended to provide the welder or welding operator with the direction needed to weld in accordance with the Code"

Contrary to the above, the welding procedure specifications did not document how the root pass welding was to be performed e.g. filler metal, filler size, electrical characteristics, etc.

- C. Criterion V of Appendix B to 10 CFR 50 states in part, "Activities affecting quality shall be accomplished in accordance with . . . procedures,"

Huico Corporate Quality Assurance Manual, Section 7.6.1. states in part, "Manufacturing and installation welding is accomplished in accordance with qualified welding procedure specifications"

Contrary to the above, welding was not accomplished in full accordance with the qualified welding procedure specifications (W.P.S.). The electrical parameters of WPS 389-500-A45 were not being complied with by two (2) of the four (4) welders observed (See Details, paragraph D.3.c.(1)).

- D. Criterion V of Appendix B to 10 CFR 50 states in part, ". . . Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

ASME Code Section III, NF-5112, states in part, "All nondestructive examinations performed under this Subsection shall be executed in accordance with detailed written procedures which have been proved to be capable of detecting and locating discontinuities described in applicable Articles of this Section"

Contrary to the above, the procedure did not prescribe the requirements of NF 4231.2(g) on inspection after removal of temporary attachments and NF 4232 on allowable offset (See Details, paragraph D.3.c.(2)).

- E. Criterion V of Appendix B to 10 CFR 50 states in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances"

Huico Corporate Quality Assurance Manual, Section 6.3.1 states in part, "All welding processes are controlled by welding procedure specifications provided by the Senior Welding Engineer. The Quality Control Inspection Supervisor is responsible for continuous surveillance to assure adherence to these written procedures."

Contrary to the above, the continuous surveillance of such things as electrical parameters, travel speed, etc. were not prescribed by documented procedures (See Details, paragraph D.3.c.(3)).

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

Huico Corporate Quality Assurance Manual, Section 9 requires a Master List be generated which describes the equipment, date of recalibration etc. (9.4.1) and requires calibration to be accomplished in accordance with the detailed procedure HSSP-200-10.

Contrary to the above, measures established did not control calibration in that a Master List as described by the QA Manual was not issued nor did the calibration procedures HSSP-200-10 provide for calibration of thermometers and the tensile tester (See Details, paragraph E.3.c.).