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 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, or a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. . . ."

QA Manual Section 4, paragraphs 4.3 and 4.4 state in part, The Quality Assurance Manager . . "will be responsible to insure that sufficient guidelines are set forth and training programs are developed by each department within the Company. . . . The QA Manager will conduct training session with Managers and Department Heads to ensure adequate knowledge of Code and Program requirements. . . . guidelines for the training program . . . are noted in written procedures QA Manager receives and maintains copies of training programs and schedules."

Contrary to the above:

- The Quality Assurance Manager has not received and/or maintained copies of training programs for the Manufacturing and Purchasing Departments.
- The QA Manager had not received and/or maintained copies of 1979 training schedules from any department.
- The QA Manager stated that he has not conducted training sessions with Managers and Department Heads to assure adequate knowledge of Code and Program requirements.
- B. Criterion XV of Appendix B to 10 CFR 50 states, "Measures shall be established to control materials, parts, or components which do not conform to requirements in order to prevent their inadvertent use or installation. These measures shall include, as appropriate, procedures for identification, documentation, segregation, disposition, and notification to affected organizations. Nonconforming items shall be reviewed and accepted, rejected, repaired, or reworked in accordance with documented procedures."

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QA Manual Section 14, paragraph 14.4 states in part, "The Quality Control Department is responsible for application and removal of Status Indicators (Hold and Reject Tags). All Status Indicators are issued from and controlled by a log maintained by the Material Control Foreman. This log is monitored by Quality Control to assure appropriate follow-up and close-out." Paragraph 14.5 states in part, "All nonconformances shall be identified, documented, segregated and tagged . . . "

Contrary to the above:

- Twenty-eight pieces of SA-193B7 rod material was identified by Hold Tag No. 931 which had not been issued from and controlled by the Material Control Log, in that Hold Tag No. 931 was not listed in the log.
- Six pieces of nonconforming plate material, 1"x 2.5"x 5", identified by the Material Control Log as Hold Tag No. 936, was not tagged. The Hold Tag was located, but the material was not. Subsequent to the identification of this deviation, the material was located, identified, and tagged.
- C. Criterion VI of Appendix B to 10 CFR 50 states in part, "Measures shall be established to control the issuance of documents, such as instructions, procedures and drawings, including changes thereto, which prescribe all activities affecting quality. These measures shall assure that documents, including changes, are reviewed for adequacy and approved for release by authorized personnel and are distributed to and used at the location where the prescribed activity is performed . . . "

QA Manual Section 10, paragraph 10.3 states in part, . . . "Work Orders are written for stock material based upon Code requirements consisting of: a. Production Order, b. NF Route Sheet with sketch and/or referenced drawing, c. Material Requisitions . . . Upon completion of the initial cutting operation . . . Quality Control confirms by sign-off and date on the NF Route sheet, that the material issued is properly identified and conforms to the required drawing, sketch or description."

Contrary to the above, even though Quality Coatrol signed-off and dated the NF Route Sheet for NF P/N 283 size 6, (confirmed identify and conformance to drawing sketch or description), sketch or the NF Route Sheet noted the material as SA-306 Grade 60 per Drawing NF 283, revision 2, whereas the Material Requisition noted the Material as SA-36, traceable to P.O. C26836. The drawing confirmed that the material was to be SA 306 Grade 60, whereas the P.O and material certifications confirmed that the material was SA-36.

It should be noted that the Load Capacity Data Sheet, revision 4, for Part Number 283, shows the rod material to be SA-675 Grade 60 (which supersedes SA-306 Grade 60) or SA-36.