

NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted on March 12-16, 1979, it appears that certain of your activities were not conducted in full compliance with NRC requirements as indicated below:

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

The Black and Veatch QA program is documented in the Quality Assurance Program - Nuclear Manual, which states in Section 1; "The program is intended to comply with regulatory requirements, including those of 10 CFR 50, Appendix B"

- A. Paragraph 6.3 of Standard Procedure SP5.2 (Drawings and Lists) of the Quality Assurance Program - Nuclear Manual states in part, "Requirements which must be fulfilled prior to approval by the Project Design Engineer and Project Engineer are defined in paragraphs 6.3.1 and 6.3.2 of this procedure. Paragraph 6.3.1 (Prerequisites for Approval) states in part, "An independent check shall be made by the Checker, or his equivalent, to verify completeness and accuracy."

Contrary to the above, the following drawings were approved by the Project Design Engineer and the Project Engineer prior to the independent check and signoff by the checker or his equivalent.

Drawing No. M2505A, Revision 1, dated October 3, 1978.

Drawing No. M4001C, Revision 1, dated August 30, 1978.

Drawing No. M4018A, Revision 1, dated August 30, 1978.

Drawing No. M4026B, Revision 1, dated August 30, 1978.

Drawing No. M4009A, Revision 1, dated August 30, 1978.

- B. Paragraph 8.0 (Deviation Permit) of Standard Procedure SP 6.1 (Control of QA Program Documents) of the Quality Assurance Program - Nuclear Manual states in part, "The Deviation Permit request is to be submitted to the Quality Assurance Manager for approval. Following approval by the Quality Assurance Manager, requests for deviations from requirements of the Quality Assurance Program - Nuclear Manual shall be submitted to the Head of the Power Division for approval."

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Contrary to the above, although the following Deviation Permits had been approved by the Head of the Power Division, they had not received prior approval by the Quality Assurance Manager.

Deviation Permit No. 022, dated March 1, 1979 - Deviation from the requirements of paragraph 6.3.1 of SP 5.2 for drawings included in specification No. 312.6310, Addendum 2.

Deviation Permit No. 021, dated March 1, 1979 - Deviation from the requirements of paragraph 6.3.1 of SP 5.2 for drawings included in specification No. 312.6010.