

NOTICE OF DEVIATION

Based on the results of a NRC inspection conducted on February 26, - March 1, 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 . . . accomplished in accordance with these instructions, procedures, or drawings."

The General Atomic Quality Assurance Manual, Section 4, requires that design changes (1) shall describe in detail the specific changes to be made (part 4.6.2.), (2) shall be limited to five (5) Change Notices (C/Ns) before incorporation into the basic document, (part 4.6.9), (3) all approved C/Ns shall be incorporated into the next revision to the basic document, (part 4.6.9), (4) each change shall be identified by a letter, (part 4.6.8).

Contrary to the above, (1) C/N 004407 did not detail the specific changes to be made to documents 4.2.5.2, 5.1.5.2, and 5.2.5.2 of HTGR Fuel Specifications, GA 10600, (2) Revision R of GA 10600 had not been issued until after 12 C/Ns had been accumulated, (3) C/Ns 004407 and 004448 approved on August 17, 1978, were not incorporated into the next revision of GA 10600, dated October 16, 1978, (4) two (2) different changes identified on C/Ns 004407 and 004414 were identified by the same letter.

- B. 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."

The General Atomic Quality Assurance Manual, Section 5, paragraph 3.5, states in part, "GA organizations other than the QA Division shall implement the requirements of the QAM in Guide Manuals, procedure manuals, division or department instructions, and other detailed work instructions, as indicated in Exhibit 5-4 of this procedure. The QA Division shall review quality-related procedures for compatibility with the requirements specified in the QAM;"

Contrary to the above, the Analytical Chemistry Laboratory procedures had not been reviewed for compatibility with the Quality Assurance Manual (QAM) requirements. As a result, the following was found.

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- F. 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."

The General Atomic Quality Assurance Manual, Section 5, paragraph 2.5, "Instructions for work affecting quality shall provide appropriate quantitative or qualitative acceptance criteria for determining that the work has been accomplished in accordance with the specified requirements."

Contrary to the above, Evaluation of Coating Density by the Gradient Column technique, QDI 29-5, established that the reference density balls be given a weight check, however no acceptance criteria for these weight checks was given (See Details, C.3.c.(2)).