

NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted on December 11-15, 1978, it appeared that certain of your activities were not conducted in full compliance with NRC requirements as indicated below:

- A. Criterion 10 of Appendix E to 10 CFR 71 states, "A program for inspection of activities affecting quality shall be established and executed by or for the organization performing the activity to verify conformance with the documented instructions, procedures, and drawings for accomplishing the activity."

Excelco QA Manual, Revision 0, Section 6.5.3 states, "Final inspections will include those tests required by the Code and as designed on the Traveler."

Contrary to the above, it was observed that cask lid bolts, were given a final inspection after fabrication which did not include the tests required by ASME Code (See Details, C.3.c.(1)).

- B. Criterion 5 of Appendix E to 10 CFR 71 states in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

Excelco QA Manual, Revision 0, Section 5.2.2.1 requires The R.I. (Receiving Inspector) shall be responsible for determining that E.D.I. (Excelco) accepts only those shipments which conform to all applicable requirements.

Contrary to the above, measures did not assure that shipments of copper accepted conformed to requirements such as identification and certification. The identification by heat/lot number was not maintained and the vendor certification received was not complete (See Details, C.3.c.(2)).

- C. Criterion 11 of Appendix E to 10 CFR 71 states, "Measures shall be established to assure that special processes, including welding, heat treating, and nondestructive testing, are controlled and accomplished by qualified personnel using qualified procedures in accordance with applicable codes, standards, specifications, criteria, and other special requirements."

Excelco QA Manual, Revision 0, Section 7.2.1.1, states in part, "Welders and welding operators will also be qualified in accordance with the Code."

Contrary to the above, some welders were observed welding who were not qualified for the welding positions used in accordance with ASME Code (See Details, C.3.c.(3)).

- D. Criterion 12 of Appendix E to 10 CFR 71 states, "Measures shall be established to assure that tools, gages, instruments, and other measuring and testing devices used in activities affecting quality are properly controlled, calibrated, and adjusted at specified periods to maintain accuracy within necessary limits."

ASME Code, Section III, NA-4133.12, which is a commitment of the Excelco QA Manual, states in part, "Measures shall be established and documented to assure that tools, gauges, instruments, and other examination, measuring, and testing equipment and devices used in activities affecting quality are of the proper range, type, and accuracy to verify conformance to established requirements."

Contrary to the above, the procedures did not assure devices used in measuring large diameters are of the proper type and accuracy (See Details, D.3.c.(1)).

- E. Criterion 5 of Appendix E to 10 CFR 71 states, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

Excelco QA Manual, Revision 0, Section 11.4.1, states, "It is the responsibility of the inspector performing tests and examinations to record all serial numbers of gages and testing equipment used by him on the inspection report."

Contrary to the above, some Inspection Reports on threaded parts did not record all serial numbers of gages used for inspection (See Details, D.3.c.(2)).

- F. Criterion 15 of Appendix E to 10 CFR 71 states in part, "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."

Excelco QA Manual, Revision 0, Section 13.1.1 states in part, "The following procedures have been established to assure that all conditions adverse to quality are promptly identified, documented and reported."

In addition the Excelco QA Manual, Section 13.4.2 states in part, "Should the investigation disclose the item to be nonconforming, the

investigator will write up an IRN (Figure 13-4) stating the reason item was declared nonconforming, giving as much detail as available, and forward to the QA office"

Contrary to the above, Procedures were not implemented to control nonconforming parts in that twelve (12) dimension nonformances were not promptly documented and reported (See Details, E.3.c.).