Burns and Roe, Incorporated Docket No. 99900503/80-01

## NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted on April 14-18, 1980, it appears that certain of your activities were not conducted in accordance with NRC requirements.

- A. Section D.3.1 of the PSAR for the Washington Public Power Supply System Hanford No. 2 Nuclear Power Plant states in part that:
  - ". . .Burns and Roe, Inc., (B&R) has been retained by the Washington Public Power System (WPPSS) to provide Engineering, Construction Management and Quality Assurance services for the design and construction of Hanford No. 2. . ."

Specific requirements and deviations therefore are as follows:

1. Sections D.2.8.3 and D.3.4.3.2 of the FSAR respectively state in part that, "The design contractors including Burns and Roe are responsible for verifying the adequacy of the design. . . Design control measures will be applied to verify or check the adequacy of the design. . . . "

Contrary to the above, design control measures are not being applied to verify or check the adequacy of all design drawings and specifications generated by Burns and Roe.

 Section D.2.8.17 of the PSAR states in part that, "Burns and Roe has been given the responsibility to receive, store and maintain the quality assurance records for WPPSS..."

Contrary to the above, Burns and Roe is not receiving, storing and maintaining the quality assurance records for WPPSS.

B. The NRC Letter of Acceptance of the Burns and Roe Topical Report No. B&Roe-COM4-1-NP-1A states in part that, "Organizational changes which do not affect the program are to be submitted no later than 30 days after announcement. . . "

Contrary to the above, organizational changes in the Quality Assurance and Project Organizations made in October 1979, November 1979 and March 1980, were not submitted to the NRC within 30 days after announcement.

Criterion V of Appendix B to 10 CFR 50 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. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished. . . ." Deviations from these requirements are as follows:

C. Paragraphs B.12.a and B.12.b of Burns and Roe project procedure WNP-2-ED-010 (Calculations) state in part that, "Assigned Checker. . .writes on the lead sheet. . .results are satisfactory. . .to certify that the check has been completed. . . ."

Contrary to the above, two (2) of eighteen (18) checked design calculations examined by the inspector that had been completed did not exhibit the required statement "results are satisfactory."

D. Paragraphs 16 and 21 of Burns and Roe project procedure WNP-2-QA-001 state in part that, "Audit team members. . .complete the Recommendation Block of the 'Audit Finding Report(s)' for their findings. . .(and the) Assistant to the Director of QA. . .forwards the (audit report and) checklist and other data to QA Division audit file. . . ."

Contrary to the above, the Recommendation Block was not completed in four (4) of thirteen (13) Audit Finding Report forms and checklists were not forwarded nor filed for three (3) of seven (7) audit files that were examined by the inspector.

E. Paragraph 5.2.2 of Burns and Roe Quality Assurance Instruction 07-102 states in part that, "Approved (Source Verifications) plans are included in the Vendor Surveillance Project Plan as Section V. . . "

Contrary to the above, an approved Source Verification Plan was not included in one of two (2) Vendor Surveillance Project Plans examined by the inspector.