

Power Piping Company  
Docket No. 99900701/80-01

NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted on January 7-11, 1980, it appears that certain of your activities were not conducted in accordance with NRC requirements.

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:

- A. Standard Nuclear Procedure for Fit-up and Manual welding of Carbon Steel, PCP-28, paragraph 2.0, states in part, "QC verify that preheat is acceptable."

Contrary to the above, QC did not verify that preheat was acceptable in that the QC inspector recorded a minimum preheat of 60°F for a tack welding operation on the Process Control Sheet 1017-012-04 although the shop fabrication sheet required a minimum preheat of 200°F for welding.

- B. Article 2 of Section V of the ASME Code, paragraph T-272, states in part, "If the radiation passes through one wall and inaccessibility prevents source-side placement of the penetrameter, a film side penetrameter may be used . . ."

Contrary to the above, a film side penetrameter was used to radiograph a butt welded joint, RT-1081-03A, although the weld was accessible for source-side placement of the penetrameter.

- C. Section D-QA-10 of the QA Manual, paragraph 5.4.5, states in part, "QC welding material clerks shall document the release of electrodes, using a welding electrode requisition made out in duplicate. One (1) copy of the requisition remains at the oven, and one (1) copy accompanies the issued material.

Contrary to the above, a copy of the welding electrode requisition did not accompany the issued material observed in a portable oven containing approximately ten (10) pounds of 3/32", 7018 electrode. It was further noted that some weld electrode requisition slips were not complete, in that, weld numbers were not filled in and one did not have authorization number or the shop sheet recorded.

D. Section D-QA-7 of the QA Manual, paragraph 8.4, states in part, "A QC Inspector shall review the fit up and welding operations and perform the following inspections . . ."

- c. Record the welder's number
- d. Record the filler metal LCN

Contrary to the above, the welders number or filler metal LCN had not been recorded for a weld build up adjacent to weld joint A on Shop Fabrication Sheet No. 1017-017-14.