

Associated Piping and
Engineering Corporation
Docket No. 99900070/80-01

NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted on January 21-25, 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. Section 9.0 of the QA Manual, paragraph 9.1.A.8, states in part, "As the sub-assembly travels through the fabrication cycle the Production Traveler (. . .) is signed off or stamped and dated by the personnel involved as the various operations are performed."

Contrary to the above, the Production Traveler S.S. 3B-496, Job Number F-18951-A was not signed off or stamped and dated by the personnel involved as the various operations are performed in that operation F11.3, record ferrite control was marked NA although the operation was performed on 9/10/79. It was also noted operation F5.8, Bevel Item 1 at weld "A" was marked NA, and the weld was completed on 7/23/79.

- B. Section 9.0 of the QA Manual, paragraph 9.1.A.8, sub-paragraph A., states in part, "As a welding operation is performed the welding Foreman shall enter the welder(s) identification number on the traveler and list the Associated Piping and Engineering Corporation material code number of the weld metal."

Contrary to the above, on S.S. No. 10, Job No. F20216F, the Welding Foreman did not enter the welder identification, the weld material used or the welding procedure for a temporary attachment on page 38A of the traveler. It was also noted that the temporary attachment material was not identified in accordance with ASME Code requirements.

- C. AP&E welding Procedure Specification 801-63, Revision 11, listed an average amperage range of 140-200 for 3/16 inch electrode using SMAW process.

Contrary to the above, a welder was observed welding on a piping sub-assembly, SS 4 Job No. F20145-A, using 3/16 inch electrode, SMAW process, at a amperage of 220, twenty (20) amps over the range allowed by the applicable WPS.

Section IX of the ASME Code, paragraph QW-351 states in part, "A welder shall be requalified whenever a change is made in one or more of the essential variables listed for each welding process." Paragraph QW-403.16 is listed as a essential variable for SMAW, SAW, GMAW, GTAW and PAW processes.

Section IX of the ASME code, paragraph QW-403.16 states in part "A change in the base metal thickness or pipe diameter beyond the range qualified in QW-452 ..".

Section IX of the ASME code, paragraph QW-452 table QW-452.3 requires additional qualification for welding pipe sizes less than 2 7/8 inches in diameter.

Contrary to the above, sockolets of 1 inch, 1½ inch and 2 inch in diameter were welded to a piping sub-assembly, S.S. No. 7 Job No. F-20145A, by a welder whose qualification records did not reflect qualification for pipe sizes less than 2 7/8 inch in diameter as required by QW-452.3 of Section IX of the ASME Code.