

Ishikawajima-Harima Heavy
Industries Co., Ltd.
Docket No. 99900038/80-01

NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted on January 28 - February 1, 1980, it appears that certain of your activities were not conducted in accordance with NRC requirements as indicated below:

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. Paragraph 14.2.1 in Section 14 of the QA Manual states in part, "Periodic audits shall be performed every six months to verify that all quality related activities are performed in compliance with the Quality Assurance Program described in this Manual and to determine the effectiveness of the Program" Paragraph 14.2.4 states in part, "QAD shall check implementation of corrective action for audit findings at the promised date of completion of corrective action"

Contrary to the above requirements:

1. Audits were not performed every six months to verify quality related activities compliance with the Quality Assurance Program, as evidenced by:
 - a. The No. 1 Plant Design Department, Equipment Design Department and the No. 2 Inspection Section of the Quality Control Department were audited on October 24, 1978, and not re-audited until December 4, 1979.
 - b. The Production Engineering Department (Vessel Shop) and Heavy Vessel Workshop were audited on October 25, 1978, and not re-audited until December 5, 1979.
 - c. The Production Control Department and No. 2 Plant Design Department were audited on October 26, 1978, and not re-audited until December 5, 1979.

2. QAD checks of implementation of corrective action for audit findings could not be verified as having been performed; in that neither the follow-up section of certain audit findings reports (with past corrective action completion dates) had been completed by QAD, e.g. December 5, 1979, audits of Production Control and Heavy Vessel Workshop, nor was alternative documentation made available to the inspector to demonstrate compliance with the requirement.

- B. Paragraph 7.6 in Section 7 of the QA Manual states in part with respect to QC responsibilities, ". . . Welding Material control activities shall be monitored at least once a week"

Contrary to the above, QC monitoring of welding material control activities was not performed at least once a week for the time periods between June 8, 1979, and November 2, 1979, and December 14, 1979, up to this inspection.

- C. Paragraph 4.2.3.(5) in Section 4 of the QA Manual states in part, "The team leader shall submit the Vendor Survey Report to Manager of QAD. If the results are acceptable, QAD shall register the vendor's name and limitations for scope of authorization on the Approved Vendor List"

Contrary to the above, Mitsubishi Steel Manufacturing Company was placed on the Approved Vendor List on June 1, 1979, without registering the survey identified scope limitations relative to nondestructive examination and Charpy-V impact testing.

- D. Paragraph 4.4.3 in Section 4 of the QA Manual states, "When any deviations from the Purchase Specification and approved document are found, the vendor's management responsible for quality assurance system shall immediately submit the report, which includes the detail description of deviation, causes, proposal for disposition, engineering basis and corrective actions to preclude repetition, to QAD through QCD. QAD is responsible for review and approval or rejection of the proposal of the vendor."

Contrary to the above, a report addressing the above requirements was not submitted by IHI Casting and Forging Division, Tokyo, relative to incorrect identification stamping on a flued head forging (DN 401-511), that was detected by the IHI Nuclear Power Division on receipt of the forging in 1979.

- E. Sub-paragraph f of paragraph 3.4.6 in Section 3 of the QA Manual states, "All documents which are affected by the design changes shall be revised and issued promptly to Organization concerned. All documents

involved in these design changes shall be controlled by Document Revision Check List (Exhibit No. 0308) which listed all documents involved."

Contrary to the above, documents, which were affected by design changes occurring as a result of Change Order Nos. 1 through 9 to Customer Purchase Order No. 11-00000-32977 (for the supply of equipment hatches), were not controlled by the use of Document Revision Check Lists.