

NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted on February 4-8, 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 3.4.3 of Quality Control Procedure No. N-7, Revision 3, dated November 28, 1979, states in part, "The QC Inspector shall document the receiving inspection activity using a receiving inspection report form In the bottom portion of the form, the inspector shall indicate the status of the inspection action, and signify 'Hold' of (sic) 'Release' actions by signature and date inclusion." Note: Revision 2, dated September 28, 1979, of the cited document, contained the identical requirement.

Contrary to the above:

- 1. The inspector had not indicated by signature, in the bottom portion of the receiving inspection report form, dated December 11, 1979, to show the release of hardware for Purchase Order (P.O.) No. 37738.
- 2. The inspector had not included the date, in the bottom portion of the receiving inspection report form, dated November 7, 1979, to show the release of hardware for P.O. No. 40606.

- B. Paragraph 5.2 of Quality Control Procedure No. N-18, Revision 3, dated November 28, 1979, states in part, "A schedule of planned audits [Internal] is maintained and implemented by the Division QA Manager."

Contrary to the above, the schedule of planned internal audits had not been implemented as evidenced by nonperformance of internal audits scheduled for January 1980.

- C. Paragraph 3.6 of Engineering Procedure (EP) No. 501, Revision 1, dated November 18, 1979, states in part, "The ECN shall be completed in the following manner" Its subparagraph .8 states, "Explain in

detail the change and the location on the drawing. If the changes are covering several Engineering Change Proposals (ECP) and Production Change Proposals (PCP), references shall be made to the respective ECP and PCP numbers."

Contrary to the above, changes and the location on the drawing had not been explained in detail on the Engineering Change Notices (ECN) involving a single ECP or PCP; rather, the ECP or PCP had been referenced by number. The following ECN's are examples, Nos. 6161, dated January 7, 1980; 6236, dated January 17, 1980; 6235, dated January 17, 1980; 6203, dated January 17, 1980; 6162, dated January 7, 1980; 6204, dated January 17, 1980; 6242, dated January 17, 1980; and 6243, dated January 17, 1980.

D. Engineering Procedure No. 502, Revision 0, dated November 18, 1979, contains the following requirements:

1. Paragraph 3.1.B., states in part, "An ECP shall be completed in the following manner"
 - a. Its subparagraph (7) states, "The Disposition of Materials shall be checked by the initiator or the engineer reviewing the ECP."
 - b. Its subparagraph (11) states, "The initiator's signature. The printed name only is not acceptable."
2. Paragraph 3.2.C. states, "Once received, Document Control will log in all ECP's and route the ECP to Engineering for review and approval. When receiving an ECP, Engineering shall commit to Document Control and (sic) Action Completed Date."

Contrary to the above:

- a. The Disposition of Materials had not been checked on the following completed Engineering Change Proposals (ECP): Nos. 2893, dated January 17, 1980; 2889, dated January 17, 1980; and 2888, dated January 17, 1980.
- b. The initiator's signature had not been applied to the following completed ECPs: Nos. 2890, dated January 17, 1980; 2889, dated January 17, 1980; and 2888, dated January 17, 1980. Note: These documents exhibited the printed name of the initiator.
- c. Engineering had not committed to Document Control an Action Completed Date upon receipt of ECPs for review and approval; as evidenced by the following completed ECPs: Nos. 2910,

completed January 31, 1980; 2893, completed January 31, 1980; 2890, completed January 31, 1980; 2889, completed January 31, 1980; 2888, completed January 31, 1980; 2773, completed January 2, 1980; and 2426, completed December 6, 1979.

- E. Paragraph 3.7 of Engineering Procedure No. 201, Revision 2, dated November 21, 1979 states, "Subsequent Changes (sic) shall be made in accordance with appropriate procedures 3.1 through 3.5, above. The Component Design Specification shall be Design Revision Dated, Numbered, and signed by the Professional Engineer." Note: Paragraphs 3.1 through 3.5 addresses preparation, format, review and certification by the Registered Professional Engineer and submittal to the Owner/Designee.

Contrary to the above, Addendum No. 1, dated December 17, 1979, to Component Design Specification No. 6022-304-1 had not been signed by the Professional Engineer.

- F. Paragraph 3.1 of Shop Control Procedure No. 103, Revision 1, dated November 26, 1979, states, "The STRS [Shop Traveler Revision Sheet] shall be the documented evidence of any changes occurring to (sic) PSD Shop Traveler as the result of an Engineering Change Proposal (ECP) or Production Change Proposal (PCP)."

Contrary to the above, a Shop Traveler Revision Sheet had not been used as documented evidence for Revision B to Sheet No. 5 of Drawing No. 6020F03005 reflected on the Shop Traveler for sub-assembly No. 3A3-326. The revision was the result of ECP No. 2040.

- G. Paragraph 3.2.3 of Shop Control Procedure No. 603, Revision 0, dated November 21, 1979 states, "The holding oven shall be thermostatically controlled to maintain a temperature in accordance with manufacturers recommendations."

Paragraph 3.2.4, of the cited document states, "A thermometer shall be placed inside the holding oven and shall be checked routinely, at least once a week, to determine if the oven is maintaining the correct temperature."

The posted manufacturers temperature recommendation indicated $175 \pm 25^{\circ}$ for the weld rods stored in the holding oven.

Contrary to the above, the holding oven had not been thermostatically controlled to maintain the manufacturers recommended temperature of $175 \pm 25^{\circ}$ F for the stored weld rods inasmuch as the thermometer inside the oven indicated 242° F at the time of the NRC inspection.