Brown and Root, Inc.
Docket No. 99900502/80-01

NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted February 11-15, 1980, it appears that certain of your activities were not conducted in accordance with NRC requirements.

A. Brown and Root, Inc., letters of response dated October 11 and November 8, 1979, described corrective action for a deviation identified during IE Inspection 99900502/79-03. Brown and Root, Inc., committed to a completion date of November 30, 1979 for all corrective action related to this deviation.

Contrary to this commitment, corrective action related to this deviation had not been completed as of the end of IE Inspection 99900502/80-01, February 15, 1980.

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:

B. Paragraph 18.2 (General) of the Brown and Root (B&R) Manual states in part that, ". . . a system for both internal and external audits shall be established in QA Procedures approved by the QA Manager and implemented by the Audit Section Manager . . . ."

Specific requirements and deviations therefrom are as follows:

1. Paragraph 5.7 (Audit Report) of procedure ST-QAP-7.1 for internal audits states in part that, "The report shall be prepared and issued containing the following information . . . b. Audit report cover sheet (Attachment 6-E) containing approval signatures . . . (ie: Section Manager, Team Leader and Team Members) . . . ." Paragraph 5.2.3 (Audit Report) of procedure QSP-8.0 contains similar requirements for vendor audit reports.

   Contrary to the above, one (1) internal and one (1) external audit report was issued without the Team Leader's signature.

2. Paragraphs 5.5.c (Preparation) and 5.10 (Audit Records) of procedure ST-QAP-7.1 for internal audits state in part that, "The

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Audit Checklist (attachment 6-B) shall be prepared by the auditors and Team Leader . . . and checklists shall be retained by the auditing organization . . . ." Paragraph 5.2.1.C (Preparation of) QSP-8.0 contains similar requirements for vendor audit checklists.

Contrary to the above, the checklists for one (1) internal and three (3) vendor audits were not retained by the auditing organization.

3. Paragraph 5.2.5.b (Failure to Respond) of procedure QSP-8.0 for vendor audits states in part that, "If an acceptable response is not received within ten (10) working days after the committed response date, the Audit Coordination Supervisor shall prepare a letter to the manager of the audited organization requesting immediate attention and response . . . ."

   Contrary to the above, no immediate action letter was prepared in fifty-seven (57) instances even though an acceptable response was not received from thirteen (13) vendors that were audited during the past ten (10) months.

4. Paragraph 18.6 (Audit Reports) of the QA Manual states in part that, "This (internal or vendor audit) report shall contain, as a minimum . . . the identification of individuals contacted during the audit. . . ."

   Contrary to the above, five (5) internal and eight (8) vendor audit reports did not identify all individuals contacted during the audit.

5. Paragraph 5.7 (Audit Report) of procedure ST-QAP-7.1 states in part that, "The internal audit report shall be issued within five (5) working days after the audit . . . ." Paragraph 18.6 (Audit Reports) of the QA Manual contains a similar requirement for vendor audit reports except that the time is extended to thirty (30) days after the audit.

   Contrary to the above, three (3) internal and three (3) external audit reports were not issued within the required time.

6. Paragraph 18.2 (General) of the B&R Manual states in part that ". . . a system of management audits shall also be established in Corporate Procedures to audit the activities of the B&R QA Department . . . ."

Paragraph 5.7 (Formal Audit Report) of implementing procedure DQ-103 (Management Audits), states in part that, "The report shall include at least the following: . . .(f) personnel contacted during audit . . . ."

Contrary to the above, Management Audit Report QAMRB-4 dated July 11, 1979, does not include the names of all personnel contacted during the audit.

C. Paragraph 18.3 (Qualification of Auditors) of the B&R QA Manual states in part that, "Personnel performing audits shall have experience and knowledge of the areas being audited and shall be trained and qualified in accordance with the Quality Assurance Personnel Training Manual . . . ."

Specific requirements from supplements H (Audit Personnel) and G (Vendor Surveillance Personnel) of Part I of the Quality Assurance Personnel Training Manual (QAPTM) and deviations therefrom are as follows:

1. Paragraphs (H)7.2.1 (Auditors and Lead Auditors) and (H)7.4 (Documentation and Records) of the QAPTM state in part that, "Certification and documentation shall be provided by the Audit Section Manager, stating the basis of qualification, the date of certification and the expiration date of the certification . . . . Quality Assurance Auditor qualification, support documentation and certification are QA records and shall be appropriately handled and stored. These records shall be maintained by the Audit Section Manager with duplicate copies provided to each nuclear jobsite for filing in the QA records vault. . . ."

   Contrary to the above, the Audit Section Manager did not maintain the required certification and documentation records for seven (7) audit personnel.

2. Paragraph (H)7.2.3 (Upgrading Certification of Auditors) of the QAPTM states in part that, "Personnel certified as Auditors may be upgraded to Lead Auditor, without additional training or reexamination, provided that all of the following requirements are met . . . . c. They have satisfactorily participated in a minimum of five documented audits . . . ."

   Contrary to the above, one Auditor was upgraded to Lead Auditor without having participated in a minimum of five (5) documented audits.

3. Paragraph (H)5.1 (Auditor) of the QAPTM states in part that "All Audit personnel shall possess an educational, experiential, and training background . . . as determined by the Individual Score Tabulation Sheet prescribed in Attachment 1 . . . ." Paragraph (H)5.2 (Lead Auditor and Section Manager) contains a similar requirement for all Lead Auditors and the Audit Section Manager.

   Attachment 1 states in part "Training and Examination (Mandatory Requirements) . . . Satisfactory completion of a training course and examination covering communication and auditing . . . ."

   Contrary to the above, three (3) of the audit personnel did not complete the mandatory examination covering communication and auditing.

4. Paragraph 5.3 of the QAPTM states in part that, "Each person who verifies that activities conform to quality requirements shall be certified to perform his assigned work."

   Paragraph 5.7.2 further states that, "Documentation shall include but is not limited to: . . . certification documentation; results of eye examinations (if required); actual grades and composite grades . . . ."

   Contrary to the above, documentation did not include:

   a. Certification documentation for personnel from QA Engineering who have been performing surveillance inspections to verify that vendor activities conform to quality requirements;

   b. Certification documentation for five (5) Supplier Surveillance Specialists who performed quality-affecting inspections prior to November 1979;

   c. Results of the eye examination for one of the above five Supplier Surveillance Specialists; and

   d. Actual grades and composite grades for the above five Supplier Surveillance Specialists.

5. Paragraph 5.2.2 (Vendor Surveillance Section Manager) of the QAPTM states in part that, "The QA Manager shall certify by means

of a written statement, that the individual being certified has the required educational background, training, and experience and has demonstrated his ability to perform the functions. The certification will state that it is issued without benefit of examination."

Contrary to the above, a written statement by the QA Manager certifying that the Vendor Surveillance Section Manager had demonstrated his ability to perform his functions was not written.

Corrective action was taken by Brown and Root during the course of the inspection; preventive action still needs to be addressed.

6. Paragraph 5.8 of the QAPTM states in part that, "All levels of QA Personnel covered under Part I of the manual shall be recertified at least once every two years." Further, paragraph 5.7.2 requires that, "Documentation shall include but is not limited to: . . . certification documentation . . . ."

Contrary to the above, the certification documentation did not include recertification for one Supplier Surveillance Specialist/ Supervisor (covered by Part I) whose previous certification was November 22, 1977.

Corrective action was taken by Brown and Root during the course of the inspection; preventive action still needs to be addressed.

D. Paragraph 5.2 (General) of the B&R QA Manual states in part that, ". . . activities affecting quality are set forth by written instructions, procedures and drawings, and are accomplished in accordance with these instructions, procedures and drawings . . . ."

Paragraphs 3.0 (Responsibilities) and 4.7 (Manuals) of implementing procedure DA 002 (Control of Approved Department Procedures) state in part that, "Each division or department shall be responsible for control of its documents or revisions to established documents . . . . The first page in the binder (of the Manual) will identify the manual name, number and holder, together with the word "controlled" or "uncontrolled" as applicable. The second page shall be a contents page listing the identification numbers and titles of all procedures contained in the manual . . . ."

Contrary to the above, two (2) South Texas Engineering Procedures Manuals did not contain a first page or a second page, and one (1) B&R Power Division Quality Assurance Department Procedure Manual did not contain a second page with the required information.