G. Dikkers and Company N.V.
Docket No. 99900361/79-02

NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted on October 29-November 2, 1979, it appears that certain of your activities were not conducted in accordande with NRC requirements as indicated below:

A. Criterion II of Appendix B to 10 CFR requires a documented Quality Assurance Program which provides control over the activities affecting quality of structures, systems and components identified as being important to safety.

Contrary to the above, although the Statement of Policy which prefaces the Dikkers QA manual states that "Those requirements of 10 CFR 50, Appendix B which are applicable to valves and castings have been included in this manual," the manual addresses only those parts of the Valves which come under the jurisdiction of the ASME Code (pressure boundary). No provisions are made for assuring the quality of other safety-related parts which are essential to the valve operation, have been identified as such in the procurement documents and are subject to the criteria of 10 CFR 50, Appendix B. Examples are: Valve actuator assembly including the controls valves, valve stem and spring assembly. (See Details Section, G.3.a).

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. The G. Dikkers and Company N.V. (DV) corrective action response letter of July 18, 1979, states in part with respect to Item B in the Notice of Deviation in Inspection Report No. 79-01, ". . . Dikkers are at present re-investigating their internal audit programme and will control these points more stringently in the future . . . Audit programme re-evaluation to be completed 790930. Implementation will be concurrent."

Contrary to the above, implementation of a revised audit program had not been made as of this inspection.

C. Paragraph NB-2431.1(c) in Section III of the ASME Code states in part with respect to the general test for qualification of welding materials, "The welding of the test coupon shall be performed using the preheat and interpass temperatures to be used in production welding. . . ."

Contrary to the above, coated electrodes (required by the DV postweld heat treatment qualification time to use the ASME Section III Code general test) were procured in accordance with ASME Section II C, SFA 5.1, i.e. respective preheat and interpass temperature ranges of 20-25°C and 135-165°C were used by the vendor; when production welding was to be performed using a 100-150°C preheat and 100-260°C interpass temperature range.

D. Paragraph 19.2.6 in Section 19.0 of the QA Manual states, "The QA Manager shall review completed NCRs for valves with the ANI and obtain his acceptance of the completed resolutions. The ANI shall sign and date the NRC to confirm his acceptance."

Contrary to the above, completed NCR No. 48095 was not reviewed with the ANI for his acceptance of the completed resolution, in that the NCR was not signed and dated to confirm his acceptance.

E. Paragraph 10.2 in Section 10.0 of the QA Manual states in part with respect to Casting Shop Order Travellers, "The Casting Shop Order Traveller is the master document . . . for controlling all Code and Customer required examinations, test and material certifications, including Customer required reviews and Witness Points and/or Hold Points . . ." Paragraph 10.8 states in part, "After satisfactory completion of the examinations, inspection and reviews as required by the Casting Shop Order Traveller, castings shall be released by the Inspector to a separate Nuclear Casting Storage Area. . . ."

Paragraph 12.2 in Section 12.0 of the QA Manual states in part with respect to Valve Shop Order Travellers, "The Shop Order Traveller is the master document during the manufacture of items for controlling all Code and customer required examinations, inspections, tests, reviews, WP's and HP's. . . ." Paragraph 12.4 states in part, "Items shall be released to a separate Nuclear Item Storage Area . . . after satisfactory completion of the . . . sign-off of the Shop Order Traveller for review (see 12.2.1.2) by the Inspector. . . ." Paragraph 12.2.1.2 requires a review to be made to assure that the listed operations have been completed and that all required sign-offs have been made.

Contrary to the above, Shop Order Travellers were not master control documents for the performance of all required examinations, inspections, reviews, witness and hold points, in that castings and valve items were released to stores as acceptable without performance of all required inspection and review activities (See Details Section, D.3.a.(2)).

F. Paragraph NB-2321.2 in Section III of the ASME Code states in part, ". . . The results, orientation and location of all tests performed to meet the requirements of NB-2330 shall be reported in the Certified Material Test Report."

Paragraph 6.1.1.2 in ASME Section II A material specification SA 350 LF 2 states in part, "The test specimen shall represent all forgings from the same heat treatment load . . . ."

Contrary to the above:

1. The orientation and location of Charpy-V impact tests performed to meet the requirements of NB-2330 were not reported on the Certified Material Test Report for seat forging Heat Code AJW65.

2. Impact testing was not performed for forgings from each heat treatment load. (See Details Section, E.3.a).

G. Paragraph 8.1 of the Dikkers Quality Assurance Manual - "Vendor Survey and Qualification" states that the QA manager is responsible for the survey and qualification of vendors. It further states that the QA manager will indicate on the Survey report if a vendor is qualified and list any limitations. Paragraph 8.1.1 states that the QA manager will enter qualified vendors on the Approved Nuclear Vendor List, which also indicates the date of expiration of the ASME certificate or the Dikkers audit due date.

Contrary to the above, Sempress b.v. was included on the Approved Vendors List, Revision 09, dated August 27, 1979, although the Dikkers survey report dated January 17, 1979, indicated that Sempress b.v. had an inadequate system for vendor qualification, calibration and audits and their system was not adequately defined for process control, manufacturing control, QA document preparation and approval, etc. The survey report contained no statement by the QA manager concerning the Vendor's qualification or any limitations. In addition, Sempress b.v. was being maintained on the Approved Vendors List through August 27 although the same list indicated Dikkers audit due date (re-audit) as 1 July 1979 and no such audit had been performed.