

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.

Criterion 5 of Appendix E to 10 CFR 71 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. NL Safety Analysis Report for the 1/2 LWT truck cask, Section XII, paragraph 2.1.(n) states in part:

"Quality Assurance Records: A basic requirement of the Spent Fuel Shipping Cask Quality Assurance Program and its implementing quality control plans and procedures is to provide a documented record of quality related activities which will (a) demonstrate that the cask has been built in accordance with approved plans and specifications. . . . This requires accumulation of quality record files for all components and structures identified as contributing to attainment of safety objectives and criteria covering each operation, test and inspection previously identified (in established specifications, plans and procedures) as necessary for assurance of requisite quality."

Contrary to the above, the quality records were not on file such as material test reports and receiving inspection reports for safety significant components used in fabrication. The records, were also not on file for all the nondestructive testing, welding and welding qualification. (See Details Section paragraph B.3.c.(1))

- B. NL Safety Analysis Report for the 1/2 LWT Truck Cask, Section XII, paragraph 1.3.1, states in part:

"The Spent Fuel Shipping Cask will be manufactured in accordance with approved plans and specifications which include specific quality requirements on systems, and components which are essential to compliance with safety criteria and basis as set forth in the safety analysis report provided for the Spent Fuel Shipping Cask and other applicable regulations and guides."

Contrary to the above, the casks were not manufactured in accordance with the approved plans and specifications. A fillet weld was not made and pressure caps were not installed as required. (See Details Section, B.3.c(2)).