

General Electric Company
Docket Nos. 71009001/80-01
99900382/80-01

NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted on February 25-29, 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. General Electric IF 300 Shipping Cask Consolidated Safety Analysis Report, Section XI, Appendix XI-1, 4.2.2 states in part:

"The fabrication record will contain all required test reports, material certifications, NDT results, weld and weldor qualifications and similar affirmations of quality. Also included will be in-process design changes, material deviation reports, receiving and in-process inspection reports, and audits."

Contrary to the above, the following documents were not contained in the fabrication record files:

1. Certification of the cask cavity pressure relief valves made by Target Rock as a 73J001, Revision J, valve as required by the Certificate of Compliance, 9001, Revision 9;
2. Certification of cask cavity and shielding tank globe valves and verification that the welding on these valves was in compliance with the requirements of the IF 300 Shipping Cask Consolidated Safety Analysis Report (SAR), specifications, and ASME Code;
3. Certifications of energy absorbing members, heat number F30479 and locating key, heat number 13524. The shielding material, heat number 331 did not have the physical testing records which are part of the material certification. The above material certifications were required by D-1 Specification and procurement documents;

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4. Qualification of a nondestructive inspector identified with the "Tulip" stamp as required by the SAR, Appendix XI-1, section 3.1.2.(i);
5. Documented acceptance of the radiographic rejection of the of the spun casting used for some inner shells as required by the SAR, Appendix XI-1, section 3.1.2(m);
6. Approval by General Electric of an in-process design change on the inner shell. The inner shell material was changed from a spun casting to a rolled and welded fabrication. Approval of such changes is required by the SAR and the specification. (See Details Section B.4.c)

- B. General Electric IF 300 Shipping Cask Consolidated Safety Analysis Report, Section XI, 11.3.1.1 states:

"The cask cavity, closure, closure seal, piping and valves will be hydrostatically tested to 600 psig at room temperature."

Contrary to the above, cask serial number 301 was hydrostatically tested to 400 psig. (See Details Section B.4.c)