National Valve and Manufacturing Company Johnstown Plant Docket No. 99900710/80-01

## NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted on March 10-13, 1980, it appears that certain of your activities were not conducted in accordance with NRC requirements.

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. Section 8 of the Quality Assurance Manual, paragraph 8.3.2, states in part, "The welder or welding operator to be qualified shall be tested as required by Section IX . . ."

Section IX of the ASME Code, paragraph QW-303.6 states in part . . . "Qualification in the 1G position shall qualify for the 1F position only. . . ."

Contrary to the above, a welder who had been qualified only in the 1G position, was observed welding in the 2F position on shop order 8002 CCH 402.

B. Welding procedure 1-HD-1, Revision 5, which is the applicable procedure for shop order 8595 PS-1, requires the use of a mild carbon steel backing material.

Contrary to the above, a welder was observed making a repair weld on shop order 8595 PS-1 using a brass backing material and not the required mild carbon steel.

It was also noted that the production weld joint design, a nonessential not reflected on the WPS as required by paragraph QW-201.1 in Section IX of the ASME Code.

C. Section 6 of the Quality Assurance Manual, paragraph 6.3.3, sub-paragraph 2, states in part, . . . "The QC Inspector shall witness all welding operations and certify conformance to procedures by initialing and dating the proper space on the QC Data Sheet or the Assembly Drawing. . . ."

Contrary to the above, the QC Inspector did not certify conformance to procedures by initialing and dating the proper space on the QC Data Sheet or the Assembly Drawing for a welding operation on shop order 4006R DG-3.

D. Section 10 of the Quality Assurance Manual, paragraph 10.4.1, sub-paragraph 1, states in part, . . . "The QC Inspector shall record the NCN number on the QC Data Sheet or Assembly Drawing."

Contrary to the above, the QC Inspector did not record the NCN number, NCN-J-647, on the QC Data Sheet or Assembly Drawing for shop order 4009R DG-3 for a part which was found to be nonconforming.