

NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted on March 11-14, 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. The B&W Topical Report (BAW-10096A), the B&W Policy on Records Retention (NPG-1311-08G) and the B&W Records Management Manuals (1E and 1E1) commit to implementing ANSI N45.2.9-1974 (Collection, Storage and Maintenance of Nuclear Power Plant Quality Assurance Records). Section 3.2.1 of the reference ANSI document states in part that ". . . All such quality assurance records shall be legible, completely filled out, and adequately identifiable to the item involved. . . ."

Contrary to the above, approximately fifteen (15) percent of the sample of microfilmed QA records retained by the NPGD Records Center that were examined by the inspector were either not legible, not completely filled out, or not adequately identifiable to the item involved.

- B. Section VI.A.2 of B&W Operating Instruction OI-1037 (QA Audit Record System) states in part that "After close out of an audit report, a permanent audit report file will be prepared . . . and will include . . . f. Checklist used in the audit concerned"

Contrary to the above, the checklists used during the execution of fifteen internal audits were not included in the permanent audit report files of audits that had been closed.

- C. Appendix A of the B&W Topical Report (BAW-10096A) commits to implementing the requirements of ANSI-N45.2.12, Draft 3, Revision 4 dated February 22, 1974 (Requirements for Auditing of Quality Assurance Programs for Nuclear Power Plants). Paragraphs 2.3 and 5.3, 4.3.3, and 4.4 of the referenced ANSI document respectively require that:

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1. "Auditing personnel, including technical specialists, shall have, or be given, appropriate training Records shall include the qualifications and training of auditors and shall be retained for the same period of time as required for the audit report with which the auditors are associated."
2. "At the conclusion of the audit, a post-audit conference shall be held with management of the audited organizations to present audit findings and clarify misunderstandings. The detailed observations of the auditors should be reviewed and an understanding reached as to the facts determined during the audit. This understanding should be recorded and signed by both parties."
3. "An audit report shall be written and signed by the audit team leader which provides . . . 1.a description of the audit scope"

Contrary to the above, the applicable implementing B&W procedures for qualifying auditors and for executing and reporting internal and vendor audits do not contain these requirements for records or actions. (See Details Section I, paragraph E.3.a.)