

NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted on February 25-29, 1979, 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 Texas Utilities Generating Company FSAR for the Comanche Peak Steam Electric Station commits Gibbs and Hill to implement the requirements of ANSI N45.2.12, Draft 3, Revision 0, dated May 2, 1973 (Requirements for Auditing of Quality Assurance Programs for Nuclear Power Plants). Paragraphs 4.4, 4.4.4 and 5.3 of the subject standard respectively require that:
1. Audit reports be signed by the team leader.
 2. Audit reports include an evaluation statement regarding the effectiveness of the QA program elements that were audited.
 3. Records shall be maintained for all personnel actively performing audits as well as those who have previously performed audits within the same project or activity. Records shall include the records of the qualification and training of auditors.

Contrary to the above, Gibbs and Hill procedures do not contain requirements that audit reports be signed by the team leader, that audit reports contain an evaluation statement of program effectiveness, or that qualification and training records of auditors be maintained. (See also Details Section I.C.3.a.(1)).

- B. Paragraph 2.1 of Quality Assurance Procedure QA-7 (Issuance, Modification and Control of Project Procedures Manual) states in part that, "All (CPSES Project Procedures) Manuals are controlled copies. They are serialized for accountability purposes, and the serial number, name of the person issued to, and the date issued are contained on a list by QA. . . . Issuance of the CPSES Project Procedures Manual, as well as additions and revisions, is accomplished by the 'Letter of Receipt' . . .

If acknowledgements are not received within 60 days after follow-up notification had been sent, the manual will be considered 'uncontrolled' and notification will be sent cancelling out the controlled number."

Paragraph 4.3.3 of Quality Assurance Instruction QAI-1 (Preparation, Format, Control and Distribution) contains similar requirements for the Quality Assurance Instruction Manual.

Contrary to the above, one Project Procedure Manual was not serialized, nor identified to its holder and nine (9) Project Procedures Manuals and Quality Assurance Instruction Manuals for which acknowledgements of receipt were not received within the specified period, were not considered "uncontrolled" as required by procedures. (See also Details Section I.C.3.a.(2)).

- C. CPSES Project Procedure PV-5 (Vendor Drawing Review Procedure) states in part, a drawing (or vendor prepared specification, calculation, or procedure) fulfilling the requirements of the specification and satisfying the needs of in-house design is considered approved and document is stamped as follows:

"Approved . . . proceed with fabrication . . . date . . . Gibbs and Hill, Inc."

Contrary to the above, a vendor prepared job specification and procedure that did not fulfill the requirements of Gibbs and Hill specification no. MS-43A (which requires solution annealing for any austenitic stainless steel subject to temperatures above 800 F during fabrication) were approved and so stamped by Gibbs and Hill. (See also Details Section III, paragraphs B.3.c and B.3.e).