

NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted on April 8-10, 1980, it appears that certain of your activities were not conducted in accordance with NRC requirements.

I. 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 4.6 of QAP 18.1 (Internal Audits) Revision A dated October 16, 1978, states that audit reports shall be issued within thirty (30) days after the post-audit conference. Furthermore Section 2.0 of Change Notice No. 1 dated June 8, 1979, to QAP 18.1 states that audit reports shall be transmitted via memorandum within thirty (30) days after the post-audit conference.

Contrary to the above, of the nine (9) audit reports issued in 1979 three (3) were not issued within thirty (30) days as required. Specifically audit reports No. QAS-79-004, QAS-79-002S, and QAS-79-006.

- B. The CE Quality Assurance Manual (QAM), Section 17.5, states in part:

"Quality related activities are documented through written operating procedures . . . ."

Contrary to the above, certain quality related activities performed by Project Management Organization are not documented through written operating procedures; specifically, these activities, required by CE Topical, Section 17.15, are to determine acceptability of recommended resolution of FARs (Field Action Requests documenting site identified non-conformances) and to indicate whether the nonconformance affects safety.

- C. The CE QAM, Section 17.2.5, states in part:

"The responsibility for assuring that personnel performing activities affecting quality are suitably trained rests with the organization performing these activities."

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Contrary to the above, the responsibility for assuring that personnel performing activities affecting quality are suitably trained has not been met by Project Management organization in that there are no records or procedural requirements to provide training in activities affecting quality such as generation, processing, approval, tracking and closure of FARs (Field Action Requests), and determination of whether safety is affected by FARs and DCRs (Deviation of Contract Requirements).

- II. C-E Power Systems letter of response, dated October 16, 1979, to Inspection Report No. 99900401/79-03 states that the current revisions of all Reactor Auxiliary Components group specifications falling within the scope of the QADM will be reviewed to determine the existence of similar deviations. This review will be completed by December 3, 1979.

Contrary to the above, the review of the current revisions of all Reactor Auxiliary Components group specifications falling within the scope of the QADM was not completed until April 8, 1980.