Hirata Valve Industry Co., Ltd.
99900355/80-01

NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted on January 21-25, 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. The Hirata Valve Industry Co. Ltd. (HV) corrective action response letter of November 12, 1979, states in part with respect to Item B in the Notice of Deviation in Inspection Report No. 79-02, ". . . Two (2) WPSs to be revised as stated in paragraph 2 above, will be submitted to the Customer by the end of November 1979, and the revision of the relative DWPs will be made within ten (10) days after receipt of the Customer's approval of the WPSs . . . ."

Contrary to the above, the two revised WPSs were not submitted to the Customer for approval until January 7, 1980, although revised on November 26, 1979.

B. Paragraph NCA-4134.12 in Section III of the ASME Code states in part, "Measures shall be established and documented to assure that tools, gages, instruments, and other measuring and testing equipment and devices used in activities affecting quality are of the proper range, type, and accuracy to verify conformance to established requirements . . . . When discrepancies in measuring or testing equipment are found at calibration, the Certificate Holder shall determine what corrective action is required. Material and items previously checked (since the previous valid calibration) with equipment which is out of calibration shall be considered unacceptable until the Certificate Holder can determine that all applicable requirements have been met . . . ."

Contrary to the above, the HV QA program did not require determination of necessary corrective action for items on which tools had been used by manufacturing personnel in an activity affecting quality, that were found during a subsequent calibration check to be discrepant. (See Details, D.3.a(1))

C. Paragraph 3.2 in HV Procedure No. GNAF-37, Revision 1, states in part, ". . . A-type devices shall be calibrated against Hirata master tools and standards in accordance with calibration methods applied by Hirata . . ." Paragraph 4.1 in HV Procedure No. GNAF-37, Revision 1, states with respect to personnel responsibilities, "Calibration Control Technician-performs servicing and calibration, maintains records, recalls devices to be calibrated, requests disposition for out-of-calibration devices, and other necessary actions prescribed in this Calibration Control Procedure."

Contrary to the above:

1. An A-type device, Pressure gage S. No. 258, was not calibrated on December 17, 1979, in accordance with Hirata calibration methods, as evidenced by the use of a 1000 Kg/cm^2 calibration point in place of the 800 Kg/cm^2 calibration point required by the applicable calibration method, GNAF-37-2-6.

2. A disposition was not requested for a dial caliper, S. No. C-04, which was found during calibration on November 7, 1979 to have an error in excess of the tolerance permitted by the applicable calibration method, GNAF-37-1-3. i.e. An error of 0.05 mm was measured for the gage against an allowed tolerance of 0.03 mm.

D. Table 4 in Procedure No. NAF-21, Revision 1, states in part with respect to applicable cleaning requirements subsequent to hydrostatic pressure tests, ". . . 2.1 Immediately after the tests, the valve interior shall be rinsed by water. (Ref. Table 3 for proper water quality to be applied) 2.2 Water drops shall be blown off with compressed air and wiped off with a dry clean cloth to have the interior completely dry . . . . 4. Inspection. The inspector from the Inspection Section shall conduct the visual examinations . . . . 5. Records. The results of cleaning work and inspections shall be recorded on the Forms as defined in 5. of CL. 5."

Sub-paragraph 10.1.3 in procedure NAF-21, Revision 1, states with respect to requirements for Class B surface cleanliness, "There shall remain no organic material, paint nor oil residue on the surface."

Contrary to the above, the following was noted on January 24, 1980, with respect to a SA 351 Grade CF8 austenitic stainless steel Class 2 gate valve, ID No. N0184A, which had been signed off on January 22, 1980, on Sequence No. 256-257 of MO No. N0184-AS R.0, as having been cleaned and inspected to Class B cleanliness subsequent to hydrostatic test:

1. Condensed water was present on the inside surfaces of caps in the valve openings.

2. An organic material, i.e. grease film was present on the valve internal surfaces adjacent to the weld preparations.

3. The results of the cleaning work and inspection had not been required by MO No. N0184-AS R.0 to be, nor was recorded on the designated forms.

E. Paragraph 4.14.1 in Section 4 of the QA Manual states in part, "Designated personnel from the QE Section shall examine all Code Items prior to packaging . . . ."

Paragraph 7.1 in Specification No. NAF-33, Revision 2, states in part with respect to packaging requirements, ". . . However, before applying the plugs, caps and seals onto the openings of the valve, reinspect the valve interior to see there remains no residue such as water out of the pressure test, sand out of the surface preparation work, smear out of the pressure tests, and/or other contamination."

Contrary to the above, the following was noted with respect to SA 216 grade WCB Class 3 gate valves, Valve ID Nos. 0215 A-H, which were observed capped and sealed in a shipping case and signed off on Sequence No. 259-260 of MO No. N0215-AS R.1, as having been packed in accordance with Specification No. NAF-33, Revision 2, on January 24, 1980:

1. No evidence was made available to the inspector to confirm the valves had been examined by QE Section personnel prior to packaging.

2. MO No. N0215-AS R.1 did not require a reinspection for cleanliness to be performed prior to application of caps and seals onto the valve openings.

3. Packaging inspection in accordance with Specification No. NAF-33, Revision 2, was called out on the MO as the sequence following packaging, i.e. 260-261, and was unsigned as of this inspection. (See Details, F.3.a(2))