

APPENDIX B

Sacramento Municipal Utility District
P. O. Box 15380
Sacramento, California 95813

Docket No. 50-312
License No. DPR-54

NOTICE OF DEVIATIONS

Based on the results of the NRC inspection conducted on April 14-18, 21-25, and May 5-8, 1980, it appears that certain of your activities were not conducted in conformance with your commitments to the Commission as indicated below:

- A. The licensee committed in correspondence of July 22, 1976, and September 23, 1976, to the provisions of WASH document 1284 and its attendant documents, including ANSI N45.2.12-1974, Requirements for Auditing of Quality Assurance Programs for Nuclear Power Plants.

Contrary to the above, licensee organizations audited by Quality Assurance did not respond as requested to four audit reports, numbers 0-168, 0-190, 0-256, and 0-258. Furthermore, audit reports did not provide a summary of audit results including an evaluation statement regarding the effectiveness of the QA program elements which were audited.

- B. Contrary to the licensee's commitment in the FSAR, Appendix 1B, Paragraph 1B.14, a Documentation Control Center was not maintained on site for quality related records of plant operating activities, and QA personnel did not review all quality-related documentation for completeness.

- C. The licensee committed in correspondence of July 22, 1976, to the following: "A management audit conducted by one member of the MSRC (with assistance as needed) is made annually on Quality Assurance. No member of Quality Assurance is a member of the team. This management audit reviews conformance to the 'orange' book and its attendant documents." This commitment was established clearly distinct from the use of outside consultants as amplified in correspondence of September 23, 1976, which referenced "independent audits being performed by outside consulting firms retained expressly to audit QA implementation."

Contrary to the above commitment, the licensee failed to audit the QA program as required.

- D. The licensee committed in correspondence of February 1, 1978, to the following: "A program is being developed for the Fire Protection Training Course that will describe the necessary strategies to be used for fighting fires at Rancho Seco. The training program will identify each area, combustibles, methods of fighting fires, access and egress routes, vital heat sensitive components and equipment, system and equipment location, toxic hazards, and ventilation and smoke removal equipment. Every type

of room identified in the Fire Hazard Analysis will be the subject of the quarterly drills. The strategy to attack each type of fire will be discussed during classroom lectures and be put to an appropriate test during the drill. These procedures will be complete within three months after NRC acceptance of this reply."

Contrary to the above commitment, fire strategy procedures had not been developed as of May 8, 1980.

- E. The licensee committed in correspondence of July 22, 1976, and September 23, 1976, to the provisions of WASH document 1284 and its attendant documents including Regulatory Guide 1.38 which states in part: "The requirements and guidelines...that are included in ANSI N45.2.2-1972 are generally acceptable and provide an adequate basis for complying with the pertinent quality assurance requirements of Appendix B to 10 CFR Part 50."

ANSI N45.2.2-1972, Section 2.7, requires the buyer to classify quality items into one of four levels with respect to protective measures to prevent damage, deterioration, or contamination of the items. Section 6.4.2 specifies the requirements for care of items in storage.

Contrary to the above, the licensee had not classified Class I items into one of the four levels identified in Section 2.7 of ANSI N45.2.2. It was observed that items in storage did not have all covers, caps, plugs or other closures intact. Two Class 1 valves, stock numbers 030342 and 033473, had protective covers partially or completely removed. Other Class I items were observed with no caps covering threads, welding surfaces uncovered, and flange faces unprotected. In addition, there were no specific programs for limited shelf life items and for preventive maintenance on Class I items.