

NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted on April 23-25, 1980, it appears that certain of your activities were not conducted in accordance with NRC requirements as indicated below:

- A. 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:

Paragraph 4.4.5 of the TFES QA manual states in part, Form 4.6, Final Documentation Checklist (FDC) shall be initiated by the QA Representative . . . the FDC shall be maintained in the QA Order File where upon completion of an order the FDC becomes the index for the final documentation package The QA Manager signifies completeness of the FDC by signoff and dating.

Contrary to the above, FDC Form 4.6 was not being used as required by the QA program. The completed Documentation Packages contained unapproved QA forms in lieu of QA approved form 4.6.

- B. Criterion XVII of Appendix B to 10 CFR 50 states: Sufficient records shall be maintained to furnish evidence of activities affecting quality . . . Inspection and test records shall, as a minimum, identify the inspector or data recorder, the type of observation, the results, the acceptability, and the action taken in connection with any deficiencies noted.

Contrary to the above, Final "as built" drawings which are also the inspection and test records were being transcribed from shop "as built" drawings, without identifying the names of the inspectors who had performed the inspections.

Corrective and preventive measures were being taken concerning this deviation prior to the conclusion of the inspection, therefore no further response to this item is required. (Details Section, E.3.a)

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