

NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted on April 7-11, 1980, it appeared that certain of your activities were not conducted in full compliance with NRC requirements as indicated below:

Section 17.1.5, Instructions, Procedures and Drawings of the Westinghouse Nuclear Energy Systems Divisions, Topical Report WCAP-8370, Revision 9A, states in part, "The Quality Assurance Program provides that activities affecting quality will be accomplished in accordance with documented instructions, procedures or drawings and that appropriate quantitative and qualitative means of verifying quality are satisfactorily accomplished and included as appropriate."

Deviations from these requirements are as follows:

- A. Quality Assurance Engineering Instruction Manual, EIM #37, Revision 2, Inspection Control card (IC card), requires that all operations and inspections be logged, the lot quantity accurately entered and all nonconformances logged on the IC card.

Contrary to the above, on Control Rod Drive Mechanism components one lot (S.O. 1X068-02) of latch housings was found without operation 0075 logged on its IC card, one lot (S.O. 1M424-A1) of stationary latch support tubes was found without an accurate lot quantity on its IC card and several lots, i.e., (1M424-02) lock plungers, and (1M424-01) stationary latches were found without all the nonconformances logged on their IC cards. (See Details, paragraph B)

- B. WCAP 8370, section 17.1.9, states in part:

"Each of the appropriate Water Reactor Divisions has established measures and procedures or set requirements which maintain control over special processes. These means include the qualification of processes and personnel for welding . . . and other processes"

"Special processes, such as welding, . . . cleaning and painting are prescribed by means of documented procedures."

Contrary to the WCAP 8370 cleaning is not addressed as a special process in the QA Manual. Qualification of the process and personnel is not documented.

- C. The Quality Assurance Program Manual, Section C5.1, states in part:

". . . product quality is maintained by clear and complete work instructions"

Contrary to the above, a procedure, in valve testing, "Periodic Water Purity Sampling," TP#3, revision F, did not address pH requirements as identified in Process Specification, "Cleaning and Packaging Requirements of Equipment For Use In the Nuclear Steam Supply System," P.S.292722. (See Details, paragraph D.3.c)

- D. QCAP 8370 table 17-1 and Process Specification, Packaging Nuclear Components and Spare Parts for Shipments, P.S. 85310QA, Revision 5, Section 4.2 commits Westinghouse to comply with ANSI Standard N45.2.2.

Contrary to the above, N45.2.2 was not complied with in that there was no evidence that wrap materials, desiccants, and caps and plugs were non-halogenated.