

J. E. Lonergan Company  
Docket No. 99900245/80-01

#### NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted on April 21-22, 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 and paragraph NCA-4134.5 of Section III to the ASME code 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."

Paragraph NB-3544.1(c) of Section III to the ASME Code specifies in part, "Sharp fillets shall be avoided . . ." This requirement is further amplified in the General Notes in Figure XI - 3120-1 of Appendix XI, which states in part. "Fillet radius 'r' to be at least 0.25 percent of 'g-1,' but not less than 3/16."

Section 8 of the ASME accepted Quality Assurance Manual states in 3.1, "When all machine operations are complete, the item will be moved to the In-Process Inspection whereupon the In-Process Inspector will check all machined dimensions . . ." and in 3.2, ". . . all items that are defective will be put on the Defective Material Report, . . ."

JEL drawing B2460, Revision 9 for Bonnet (0022010172) specified a 5/16 radius at the hub of the flange and backfaced to 3 5/8 inch diameter.

Contrary to the forgoing requirements the following deviations were noted:

1. The 5/16 inch radius was removed in the backfacing operation;
2. The radius after the backfacing operation was less than 3/16 inch;
3. The departure from design by the removal of the 5/16 inch radius, was not identified on a Defective Material Report; and
4. There was no evidence that the as-built condition had been reconciled with the design report as required in Article NCA 3554, of Section III of the Code.

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