

NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted on May 5-6, 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." Deviations from these requirements are as follows:

- A. Paragraph II.A.2. of AM's procedure 20-71-04 states, "Assign technical qualified personnel, other than those who participate in preparation of the design, to perform design reviews for the purpose of determining through analysis that the valve design satisfies all customer and Code requirements."

Article NB 3111, of Section III of the ASME Codes states in part; "The loadings that shall be taken into account in designing a component include . . . (b) impact loads, . . . (d) super imposed loads such as . . . operating equipment . . . , (f) reactions . . . of supports."

Contrary to the above, it was noted that the Design and Stress Report No. 201-14225-00, for a 16 inch, 1500# Class 2 Wye Stop Check Valve with a hydraulic operator, did not include for evaluation the calculated forces imposed upon the back seat and load key of the pressure seal by the hydraulic operator. The omission of this code requirement, which apparently had been overlooked during the design review, provided objective evidence that Procedure No. 20-71-04 was not being implemented in a manner which ensures that the valve design satisfies all customer and code requirements.

- B. Article NB 2538(a), of Section III of the ASME Code, states in part; "Unacceptable surface defects shall be removed by grinding or machining . . . ."

Contrary to this requirement the AM Quality Assurance Program does not provide a procedure which addresses this code requirement. This finding is supported by the arc-strikes and associated surface defects observed on the bonnet flange of a 10 inch, 300# Class 2 swing check valve S/N 16-15008, AM drawing No. 15008-OA.

- C. Articles NB and NC 4231.2(e), of Section III of the ASME codes, establishes a requirement to mark the immediate area around temporary attachments in a manner that the area can be identified for magnetic particle or liquid penetrant examination after the temporary attachments are removed.

Contrary to the above, the AM Quality Assurance Program does not provide a procedure, or instruction, which addresses this code requirement. This finding is supported by the fact that during the inspection of a 10 inch 300# swing check valve, S/N 16-15008-04, it was observed that the immediate area of temporary attachments, had not been marked to identify the area until the magnetic particle or liquid penetrant examination was performed.