

NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted on July 28 - August 1, 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 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. Pittsburgh - Des Moines Steel Company (PDM) Quality Assurance Specification (QAS) II, Revision 1, Paragraph 4.0, subparagraph 4.2 states, "To be considered for certification, a candidate shall satisfy one of the following requirements listed for each discipline." Paragraph 4.2.2.2, Level II magnetic particle, states for Certification, the candidate shall be a High School graduate, or its equivalent, plus three months' experience in magnetic particle testing, plus 8 hours' training in accordance with a recognized training agency/in-house program approved by the Division QA Manager.

Contrary to the above, two (2) NDE Technicians were identified as being qualified/certified as level II examiners for magnetic particle inspection, with no documented proof of the three (3) months experience required for magnetic particle testing certification.

- B. Pittsburgh - Des Moines Steel Company (PDM) Radiographic Examination Procedure WRT-1, Revision 0, dated February 11, 1976. Paragraph 11.0, titled Technique Procedures states in part, "Radiographic examinations shall be performed in accordance with a written Technique Procedure. Each Technique Procedure shall be certified by a qualified Level III NDE individual. Form No. 17955-B or 17955-C shall be used."

In addition, Procedure WRT-1 states that each Technique Procedure shall be in the Radiographer's possession during the examination process, and shall accompany the radiographs through the interpretation process.

Contrary to the above:

1. Radiographic examinations were, and are, being performed without a certified/approved written RT Technique Procedure.
2. Certified/Approved RT Technique procedures were not in the possession of the examiner during Examination, and procedures are not being used in the interpretation process.