

U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT
REGION IV

Report No. 99900242/80-01

Program No. 51300

Company: Pittsburgh - Des Moines Steel Company
Western Division
510 East 6th Street
P. O. Box 1447
Provo, Utah 84601

Inspection Conducted: July 28 - August 1 1980

Inspector: *J. W. Sutton*
J. W. Sutton, Contractor Inspector
Components Section I
Vendor Inspection Branch

8/25/80
Date

Approved by: *D. E. Whitesell*
D. E. Whitesell, Chief
Components Section I
Vendor Inspection Branch

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Summary

Inspection on July 28 - August 1, 1980 - (99900242/80-01)

Areas Inspected: Implementation of 10 CFR 50, Appendix B, and applicable codes and standards, including action on previous inspection findings, NDE Personnel and Procedures, QA Review, Organization/Program Review of Vendor's activities and Part 21 Reporting Procedures. The inspection involved Thirty-one (31) inspector hours on site by one (1) NRC inspector.

Results In the Five (5) areas inspected, no deviations or unresolved items were identified in Four (4) areas. The following was identified in the remaining area.

Deviations: NDE Personnel and Procedures. (1) NDE Personnel being qualified without required documentation of practical experience. (Notice of Deviation, Item A). (2) Radiographic examination being performed without approved technique procedure. (Notice of Deviation, Item B).

Unresolved Items: None.

DETAILS SECTIONA. Persons Contacted
Pittsburgh - Des Moines Steel Company (PDM)

- *N. L. Allred, Production Manager
- W. Eads, Engineering
- K. Jensen, NDE Technician
- *D. R. Johnston, Division QA Manager
- *T. Martin, Plant QA Manager
- T. Robinson, NDE Supervisor
- *D. Wilson, Shop Superintendent

Factory Mutual Engineering (FME)

P. M. Howe, Authorized Nuclear Inspector (ANI)

*Denotes those persons who attended the exit interview.

B. Action on Previous Inspection Findings

1. (Closed) Deviation A (Report No. 79-01): Temporary attachments not being installed or removed according to procedures. The inspector verified by review of PDM's QA and shop records, (CAR's - FCA's NDE Reports), that the work described in PDM's letter of August 27, 1979 had been completed as indicated. Instruction/Training of Supervising/Shop personnel had been performed and has been documented.
2. (Closed) Deviation B (Report No. 79-01): FCA's not prepared for addition and removal of temporary attachments.

The inspector reviewed PDM's corrective action as outlined in PDM's letter of August 27, 1979. CAR's, ECAR's were issued and rework and examination were initiated and documented.

Training sessions with Supervising/Shop personnel was initiated and documented. The Engineering ECAR was completed on 9-1-79.

C. QA Program Review (Organization - Program)1. Objectives

The objectives of this area of the inspection, were to ascertain whether the QA Program has been documented in writing, and that it is being correctly implemented in a manner that will ensure that components manufactured are in compliance with code requirements, and meet the prescribed quality standards. Also, to ascertain whether

the program is consistent with NRC regulations, contract, and code requirements.

2. Method of Accomplishment

The preceding objectives were accomplished by:

- a. Review of PDM's Corporate QA Manual, dated June 1978.
- b. Review of PDM's Corporate QA Manual Appendix C, Revision 2 for the Provo Plant. Dated 9-14-79.
- c. Review of appropriate organization charts to verify that the QA staff is independent from the pressures of cost and scheduling and has access to upper management.
- d. Review of the documents concerning the authority, duties, and responsibilities of the Quality Assurance staff, to verify that they have the independence to identify quality problems, initiate appropriate corrective action, and have the authority to stop work.

3. Findings

a. Deviations

None.

b. Unresolved Item

None.

D. Nondestructive Examination

1. Objectives

The objectives of this area of the inspection were to verify that:

- a. The manufacturers program for qualification of personnel performing special processes (other than welding) meets regulatory and applicable ASME Code and contract requirements.

- b. All personnel performing special processes, including nondestructive examination are being qualified in accordance with the above program and the manufacturers overall QA plan.
- c. Nondestructive examination procedures used by the manufacturer meet ASME Code and applicable regulatory and contract requirements.
- d. Nondestructive examination is being conducted by properly qualified personnel in accordance with the above procedures and the manufacturers overall QA plan.

2. Method of Accomplishment

The preceding objectives were accomplished by:

- a. Review of PDM QA Manual, Section 13.4.2, NDE Procedures.
- b. Review of PDM QA Manual, Section 13.4.2 NDE Personnel.
- c. Review of Quality Assurance Specifications QAS, I-II-III.
- d. Review of Thirteen (13) NDE Personnel/training records.
- e. Review of Pt Procedures WPT-3 Revision 1, and Radiographic Procedure WRT-1.
- f. Review of FCL 6-7.11, FCA-3. Drawings 67 and 301.3.
- g. Review of Radiographic film - R2 - View 0-1-R2.
- h. Review of material certifications for Cleaner-Penetrant and Developer in use.
- i. Review of SNT-TC-1A 1975, "Personnel Qualifications and Certification in Nondestructive Testing"
- j. Discussion with NDE Personnel.

3. Findings

a. Deviations

See Notice of Deviations, Items A and B.

b. Unresolved Items

None.

E. 10 CFR Part 21 Inspection1. Objectives

The objectives of this area of the inspection were to verify that the vendor has established and published procedures and controls that are adequate to assure implementation of Part 21 requirements.

2. Method of Accomplishment

The preceding objectives were accomplished by:

- a. Review of PDM's Procedure for Posting of Part 21 requirements.
- b. Review of PDM's procedure for notification to NRC of an existence of a Defect, dated 10-26-79.
- c. Review of requirements for evaluating deviations or informing the licensee or purchaser of deviation.
- d. Review of notification to NRC by PDM of a Part 21 deviation dated August 1, 1979 from PDM's Corporate office

3. Findings

From the documents and Records reviewed, it was determined that the Control of Part 21 deviation has been documented and implemented.

No deviations or unresolved items were identified in this area of the inspection.

F. Review of Vendors Activities1. Objectives

The objectives of this area of the inspection were:

- a. To update the Vendors Activities to assess their impact on future IE inspections.
- b. Review of the current workload.

2. Method of Accomplishment

The foregoing objectives were accomplished by discussions with the vendors management personnel and a review of future nuclear orders and nuclear orders in process.

3. Findings

- a. The vendor is currently processing Three Nuclear Projects for fabrication of personnel airlocks, which represents approximately 35% of the present workload.
- b. General - The Provo Plant has been issued ASME Corporate Certificates of Authorization N-1492-6 and NPT 1494-6 to expire on October 19, 1982.

G. Exit Interview

The inspector met with management representatives (denoted in paragraph A) at the conclusion of the inspection. The inspector summarized the scope and findings of the inspection. The management representatives had no comment in response to the items discussed by the inspector.