

NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted on August 4-8, 1980, it appears that certain of your activities were not conducted in accordance with NRC requirements.

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. Section 6.3.1.(5) of Standard Procedure SP 3.2 (Project Design Manuals) states that the PDE-Systems will provide the required input to the B&V Drawing Index so that ECNs outstanding against each PDM section are identified.

Contrary to the above, the ECNs outstanding against each PDM section are not identified as evidenced by the following examples from Supplement C to the Black & Veatch Drawing Index dated July 2, 1980:

1. ECN-N-I-0183 was cancelled yet it is listed as outstanding against PDM Section 4.3. in the B&V Drawing Index.
2. ECN-N-I-0182 that is outstanding against PDM Section 4.3 is not listed in the B&V Drawing Index.

- B. Paragraph 5.1 of Section 5 (Instructions, Procedures, and Drawings) of the Black & Veatch Quality Assurance Program-Nuclear states in part that activities affecting quality shall be prescribed and controlled by documented instructions, procedures, and drawings. Black & Veatch has established Engineering Change Notice (ECN) Logs designed to track and control ECNs awaiting incorporation into their respective documents.

Contrary to the above, documented instructions or procedures have not been prepared prescribing the use and control of the ECN Logs, consequently errors and inconsistencies are being made in these logs. The following were identified by the inspector in the ECN Log maintained by the Systems Department.

1. ECN-N-I-0182: The entry indicates the Document Title as Section 4.2 when it should have been Section 4.3, and indicates the date issued as June 3, 1980, when it should have been March 4, 1980.

2. ECN-N-I-0184: The entry indicates the Document Title as Section 4.3 when it should have been Section 5.9.
3. ECN-N-I-0179: The entry indicates the Document File Number as 6212.215.0583.12 when it should have been 6212.215.0563.12.
4. The Date of Revision entry for the following ECN's was found to be the date the ECN was typed which preceded the final approval date by several weeks:

ECN-N-I-0179

ECN-N-I-0184

ECN-N-I-0182

ECN-N-I-0181

- C. Black Fox Station (BFS) Project Instructions Manual, Section 8, "Licensing Documents states in Section 8.5.3, "PSAR/ER Amendments and Revisions to Reflect Design Changes:"

"In those cases where the PSAR/ER is affected by preliminary design changes, ie. design changes not covered by design change control procedures, the DE's (Designated Engineers) are responsible to prepare appropriate revisions as necessary to maintain the PSAR/ER consistent with the latest design concepts . . . Designated Engineers will forward to the Licensing Engineer draft revisions of PSAR pages which reflect current BFS design."

Contrary to the above, no draft revisions of PSAR pages or other mechanism to reflect changes and current design have been submitted to the Licensing Engineer by the DE for the following:

1. PSAR Sections A4.2 and A4.2.1 concerning the RVDL (Relief Valve Discharge Line) state that carbon steel Schedule 80 pipe will be used from the elbow above the suppression pool to the quencher, whereas current design requires stainless steel Schedule 40 pipe.
2. PSAR Section Section A7.2.2.1 concerning back pressure on the safety-relief valves states that maximum back pressure will be 40% of relief valve set pressure, whereas the design values for back pressure are correctly based on a maximum of 40% of safety relief valve inlet pressure (rather than set pressure).

- D. Section 3.5.2 of the QAN (Quality Assurance Manual-Nuclear) states, "The SDS provides specific design criteria which are to be followed and which

are the bases for verifying, checking and reviewing the resulting detailed design. Deviations from such requirements are to be identified, documented, reviewed and resolved to assure that the safety and reliability of the systems, structures and components of the plant are achieved."

Contrary to the above, the review and resolution of necessary deviations to detailed designs in SDSs (System Design Specifications) are not being documented in all cases (see Details Section III paragraph C.3.a).