

NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted on July 21-25, 1980, it appeared that certain of your activities were not conducted in full compliance 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. Paragraph 2.1 of sections QA-II-1 and QA-III-1 of Ebasco Topical Report ETR-1001 (Ebasco Nuclear Quality Assurance Program Manual) states in part, "Where the Ebasco Nuclear Quality Assurance Program Manual designates an individual or organization with the responsibility of performing quality related functions, such functions shall be performed in accordance with written instructions, procedures or drawings that have been developed by the department performing the function. These instructions, procedures and drawings shall establish the manner of performing the activity in accordance with the requirements of the Ebasco Nuclear Quality Assurance Program Manual."

Contrary to the above, the Ebasco procedures developed to control activities on St. Lucie Plant, Unit 1 with respect to IE Bulletin 79-14 (Seismic Analysis for As-Built Safety-Related Piping Systems) were inadequate and were not approved until July 16, 1980. The procedures were inadequate in not addressing the time frames and responsibilities for evaluating non-conformances as specified in IE Bulletin 79-14 with respect to system operability and notification of Florida Power & Light Company.

As the work on St. Lucie Plant, Unit 1 is essentially complete no purpose will be served by revising the existing procedures, but Ebasco should address the problem of preventive action for any future contracts of this type.

- B. Paragraph 4.1 of section QA-I-4 of Ebasco Topical Report ETR-1001 (Ebasco Nuclear Quality Assurance Program Manual) states in part, "Activities involved with the preparation, approval and amendment of SAR contents shall be detailed in, and performed in accordance with written instructions or procedures. . . ."

Ebasco Nuclear Licensing Department Procedure L-3 entitled "Processing SAR Change Requests" details the methods for changing requirements in the SAR.

Contrary to the above, in the seismic analysis for the as-built safety-related piping system for St. Lucie Plant, Unit 1, Ebasco did not use the damping

values provided in the Florida Power & Light Company St. Lucie Plant Unit No. 1 Final Safety Analysis Report and did not process a SAR Change Request to amend the SAR as required by procedure L-3. A value of 2% was used in place of 0.5%.