

NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted on August 19-21, 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. The eighth paragraph of Section 1.0 of the Quality Assurance Manual, Revision 6, dated January 18, 1980, states in part, "The procedural details which implement the general outline contained in this manual are in the form of Work Instructions, Technical Standards, Factory Instructions, and Engineering Memorandums."

Contrary to the above, operation of the interface controls of Continuous Vulcanizing Lines 1 and 2, had not been prescribed by formal, released, documented instructions, procedures, or drawings.

See Details Section, paragraph D.3.a.

- B. Paragraph 4. of Factory Instruction No. 173, dated October 29, 1975, states in part, "Compound Q.A. will make a microscopic examination of the screen packs each day and record findings in their log book."

Contrary to the above, Compound Q.A. had not recorded findings of the microscopic examination each day; however, such examinations had been made.

- C. The second paragraph of Work Instruction No. CV-0033, dated June 5, 1979, states in part, "Notations are to be made on each chart showing the CV line number, date and the test number indicating the start of a production run . . . . Abnormal pressures shall be given special notation and all charts initialed by the Supervisor inspecting the charts."

Contrary to the above, the recorder charts reviewed had not been annotated as required. Example: None had been initialed by the supervisor; some did not reflect the CV line number.

D. The Calibration Manual, dated March 26, 1980, contains the following requirements:

1. "A calibration label, with the equipment serial number, date of calibration, calibration technician's name, and date of next calibration, will be placed on the Capacitance Bridges . . . and Wheatstone Bridges."
2. "Micrometers and pin gauges are to be recalled for calibration . . . ." Recording of data on the appropriate Calibration Sheet is also required.

Contrary to the above:

- a. A calibration label had not been placed on the LC Digibridge, GenRad 1688, Serial No. 4212. The Calibration Sheet indicated the equipment had been calibrated on July 15, 1980.
- b. A Micrometer, Mitutoyo-193-211, Serial Number 398, had not been recalled for calibration; as evidenced by the Calibration Sheet which indicated that calibration was due in September 1979.

E. Work Instruction, Compound QA No. 0006, dated August 17, 1979, requires that the Compound QA Supervisor contact outside calibration services at scheduled intervals and "Check for accurate dates of calibration service and due dates of next calibration."

Contrary to the above, outside calibration services had not been contacted for the following equipment which displayed calibration labels with a due date of July 1980: (a) The Microcon 1 Console of the Instron Physical Tester and (b) The Honeywell Electronik 196 Recorder, Serial Number 893131001, on the Mooney Viscometer.

In addition to the above, the following deviation on QA Program content was identified.

F. Criterion XII of Appendix B to 10 CFR 50 states, "Measures shall be established to assure that tools, gages, instruments, and other measuring and testing devices used in activities affecting quality are properly controlled, calibrated, and adjusted at specified periods to maintain accuracy within necessary limits."

Production Test Procedure No. KPT-LVI-2, dated March 20, 1980, requires that test voltages be applied for specified durations to "each individual insulated length of conductor" and "each length of completed multiconductor cable." Examples: AC and DC Withstand Voltage - five minutes; Insulation Resistance - one minute; and AC Withstand Voltage - one minute.

Contrary to the above, measures had not been established to assure that timers had been properly controlled, calibrated or adjusted. The timers, of concern, are used to measure the specified duration of test voltages.