

Marvin Engineering Company, Inc.  
Docket No. 99900388/80-01

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:

- A. The Marvin Engineering Co., Inc. (MEC) letters of January 11, 1980, and March 17, 1980, provided actions and completion dates to correct and prevent recurrence of 27 deviations, which had been identified in the enclosure of Inspection Report No. 79-01.

Contrary to the above, MEC did not accomplish certain of these actions in accordance with commitments, as evidenced by:

1. The MEC corrective action response letter of January 11, 1980, states in part with respect to Item 6 in the Notice of Deviation in Inspection Report No. 79-01, ". . . Incoming materials purchased for manufacturing including weld rod, is received, issued a lot ticket, and then determined whether it is acceptable. If acceptable, tagged acceptable, if rejected, tagged rejected . . . ."

Contrary to the above, nuclear welding materials in current fabrication use, which had been determined to be acceptable, were observed to have not been tagged acceptable (See Details, B.8.).

2. The MEC corrective action response letter of January 11, 1980, states in part with respect to Item 7 in the Notice of Deviation in Inspection Report No. 79-01, ". . . Stop work authority which has always been the responsibility of the inprocess inspectors has been reiterated and all inspectors have been so notified by the Chief Inspector, Jim Richardson. Notification was given on November 15, 1979 . . . ."

The MEC corrective action response letter of March 17, 1980, states in part on this subject, ". . . The Nuclear QA Manager held meetings with the inspectors as to their responsibilities. The discussions held were concerning: A) Inprocess Inspection B) Manufacturing Control C) Stop Work Authority. The discussions above were based on M.E.C.'s QA Manual and have been logged (book form) as to time, date, and personnel attending. Each of the participants at the formal meetings signed the attendance log . . . ."

Contrary to the above, review of the Chief Inspector and QA Manager discussion logs indicated only one of the inspectors had attended a meeting, which specifically addressed responsibilities relative to stop work authority.

3. The MEC corrective action response letter of January 11, 1980, states in part with respect to Item 8 in the Notice of Deviation in Inspection Report No. 79-01, ". . . Trend reports for 1979 are being prepared and will be complete by February 28, 1980 . . . ."

Contrary to the above, trend reports for 1979 had not been prepared as of this inspection.

4. The MEC corrective action response letter of March 17, 1980, states in part with respect to Item 9 in the Notice of Deviation in Inspection Report No. 79-01, ". . . All inspectors including the QA Manager and Chief Inspector have been cautioned on the use of inspection stamps and if there are discrepancies to immediately make the Nuclear QA Manager aware of such a discrepancy. The meeting held was of a discussion type and all present have signed the attendance log."

Contrary to the above, review of MEC discussion logs did not indicate that a meeting had been held with all inspectors relative to use of inspection stamps (See Details, B.11.).

5. The MEC corrective action response letter of January 11, 1980, states in part with respect to Item 15 in the Notice of Deviation in Inspection Report No. 79-01, "All MOs are being completely filled out as to procedure and/or revisions to make it a detailed operational information sheet . . . . No MO will be released to the shop floor until all of . . . above is accomplished and signed off by the QA Manager and/or Chief Inspector. MO procedure began November 15, 1979."

Contrary to the above, welding procedure specifications for tack welding operations were not specified on the MOs for Feedwater Spargers, S/Ns 1, 2, 3, and 4, Job 2480 G. These MOs were released for manufacturing on February 6, 1980.

6. The MEC corrective action response letter of January 11, 1980, states in part with respect to Item 17 in the Notice of Deviation in Inspection Report No. 79-01, "All MOs have to be released through the planner, dated, signed off and verified by the QA Department. Inprocess inspectors will ensure that no work is being performed without a proper, approved MO on the floor . . . ."

Contrary to the above, four additional MOs (649, 650, 651, and 652) for Feedwater Spargers, Job Nos. 2480 F, G, H, and I, respectively, were observed to have been completed (all manufacturing work was finished) without having a release date entered on the MOs. In addition, the MO Control Log, maintained by the Planner, did not have release dates entered for these MOs.

7. The MEC corrective action response letter of January 11, 1980, states in part with respect to Item 22 in the Notice of Deviation in Inspection Report No. 79-01, ". . . The Chief Inspector maintains the log and performs periodic reviews (Monthly) with the help of his inprocess inspector to ensure that the welders have their correct stamps and are using them in a proper fashion for historical documentation . . . ."

Contrary to the above, the log maintained by the Chief Inspector does not show monthly reviews in that the entries showed reviews being performed on 2-15-80, 6-20-80, 7-9-80, and 8-6-80.

- B. 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."

QA Manual Item 14, paragraph 4.1 states in part, "Any changes to the manufacturing work order shall be made by the planner . . . ." It shall be initiated, detailed and released by the planner . . . ." This covers changes prior to release to manufacturing. Paragraph 5.1 states, "ABSOLUTELY NO CHANGES OR REVISION will be made to any of the manufacturing orders, procedures, etc., without concurrence of the Nuclear Program Manager, QA Manager or Customer (if required per contract)." This covers changes after release to manufacturing.

Contrary to the above, the manufacturing orders (MO) for Feedwater Spargers, Serial Nos. 1, 2, 3, 4, for Job 2480G, had all been changed by personnel other than the Planner relative to the required revision level for certain procedures specified on the MO (Liquid Penetrant, Heat Treatment, Pickle and Passivate), and without receiving the concurrence of the QA Manager or Nuclear Program Manager. There was an initial after each change; however, it could not be identified.