

NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted on December 1-5, 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. Paragraph NB-4213.2(e) in Section III of the ASME Code states in part with respect to Charpy-V impact specimen requirements for forming qualifications, "Sufficient C_V test specimens shall be taken from each of the three heats of material to establish a transition curve showing both the upper and lower shelves. On each of the three heats, tests consisting of three impact specimens shall be conducted at a minimum of five different temperatures distributed throughout the transition region. The upper and lower shelves may be established by the use of one test specimen for each shelf"

Paragraph NB-4213.3 states, "To be acceptable the formed material used in the component shall have impact properties before forming sufficient to compensate for the maximum loss of impact properties due to the qualified forming processes used."

Contrary to the above:

1. C_V test specimens were taken from only one heat of material in the qualification of shell forming.
 2. The procurement requirements for pressurizer and steam generator shell plate did not assure that the impact properties before forming were sufficient to compensate for the loss of impact properties due to the forming process used (See Details II, C.3.a.).
- B. QA Program Manual Section 16.0, paragraph 16.2.3.4 states, "A quality trend report issued periodically (approximately monthly) by QA Engineering shows frequency of various dispositions on nonconformance reports. This report is analyzed by cognizant personnel from Manufacturing, Manufacturing Engineering, Design Engineering and Product Assurance."

Contrary to the above, quality trend reports have not been issued approximately monthly by QA Engineering, in that only three were issued between January, 1980, and the time of this inspection. (See Details Section I, paragraph C.3.a.).