

NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted January 5-8, 1981, it appears that certain of your activities were not conducted in accordance with NRC requirements.

- A. Brown and Root letter of response dated December 16, 1980, described corrective actions and preventive measures for the four deviations identified in I&E Inspection Report 99900502/80-03. Brown and Root committed to a completion date no later than December 31, 1980, for all action related to Notice of Deviation, Items A and B.

Contrary to the above, corrective action for Notice of Deviation, items A and B, was not completed as committed. (See Details Section I, paragraphs B.10 and B.11.)

- B.\* South Texas Project Engineering Procedures STP-DC-007 (Preparation and Control of System Design Descriptions) and STP-DC-019 (Technical Reference Control) state that design criteria documents, in conjunction with System Design Descriptions, comprise the STP Design Manual. Design criteria documents may be issued as Technical Reference Documents which are reviewed, approved, distributed to Assistant Engineering Project Managers, Discipline Project Engineers, Project Quality Engineers and others by the Engineering Document Control Center and made available for use on the South Texas Project. Technical Reference Documents require the signed approvals of the Originator (as applicable), the Discipline Project Engineer, Project Quality Engineering, the Engineering Project Manager, and Quality Assurance and/or the Client (as required).

Contrary to the above, Technical Reference Document A010PQ003-A (Penetration Sealing System) and six (6) others that were issued and distributed in mid 1978 by the Engineering Document Control Center, and that were contained in the STP Design Manuals assigned to the Assistant Engineering Project Manager, the Discipline Project Engineer and the Project Quality Engineer, did not exhibit the required signatures of the Discipline Project Engineer, the Project Quality Engineer, the Engineering Project Manager and Quality Assurance to document their review and approval of the documents. Refer to report section I.C.3.a.(1) for details.

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- C.\* Section 6.3.1. of the South Texas Project Quality Assurance Manual states in part that "To ensure that the responsible engineering personnel are working to the latest revision or issue of an Engineering document, a comprehensive document status list shall be published at least every two months by the EDCC (Engineering Document Control Center).

Contrary to the above, a comprehensive document status list has not been published, nor updated, bi-monthly by the EDCC since October 2, 1980.

Refer to report section I.C.3.a.(2) for details.

\*Denotes deviations from the requirements of Criterion V of Appendix B to 10 CFR 50 that states in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, or a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. . . ."