

NOTICE OF NONCONFORMANCE

Based on the results of an NRC inspection conducted on January 26-30, 1981, it appears that certain of your activities were not conducted in accordance with NRC requirements.

Criterion V of Appendix B to 10 CFR Part 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." Nonconformances with these requirements are as follows:

- A. Gibbs and Hill Design Control Procedure DC-3 states in part that, "The title block follows the sample block shown in the above noted Appendix (DC-3-I) . . ." which shows that the sheet number of the drawing is indicated by a numerical designator suffixed to the drawing's numerical sequence number.

Contrary to the above, the sheet number of forty-two (42) of fifty-five (55) safety related drawings examined by the inspector was not indicated by a numerical designator suffixed to the drawing's numerical sequence number. (See Details Section I, paragraph C.3.)

- B. Gibbs and Hill Topical Report GIBSAR-17 and implementing procedure QAI-G respectively state in part that, "The Vice Presidents or Assistant Vice Presidents responsible for engineering, project, procurement, construction and QA institute annual reviews in the areas under their cognizance Procedures for performing these reviews and audits are established in the G&H Quality Assurance Manual . . . (which states that) management reviews of the Engineering, Project, Quality Control, Procurement and QA Departments shall be performed on an annual basis timed so that the evaluation reports shall reach the QA Manager's desk no later than August 31, of each year. Similarly, the Corporate Overview of the QA Program shall be performed on an annual basis scheduled to follow issuance of the foregoing evaluation reports, but no later than September 30 of each year"

Contrary to the above, the 1980 management review evaluation report of the Engineering Department was not issued until October 13, 1980, and consequently, the 1980 Corporate Overview of the QA Program was not performed until November 19, 1980.

- C. Gibbs and Hill Quality Assurance Procedure QA-5 states in part that, "Each in-house engineering course is presented annually."

Contrary to the above, the Gibbs and Hill in-house technical training course entitled "Nuclear Engineering Course (T003)" is not being presented on an annual basis. The last Nuclear Engineering in-house course was given between the dates of March 30, 1978 and August 17, 1978.

- D. Gibbs and Hill Corporate Procedure OPD-1 (Reporting Safety Related Defects and Noncompliance Pursuant to 10 CFR 21) establishes the Gibbs and Hill policy and provides implementing instructions for complying with 10 CFR Part 21 posting requirements, convening and documenting the results of all meetings of the "safety concern evaluation board," and for completing and signing concurrence/nonconcurrence forms with respect to evaluating the reportability of identified safety concerns.

Contrary to procedure OPD-1, Gibbs and Hill did not fully comply with (1) the posting requirements; (2) the time requirement for convening the "safety concern evaluation board;" (3) the results of all meetings held by the board; and (4) the completion of the required concurrence/nonconcurrence forms with respect to evaluating the reportability of identified safety concerns.

Gibbs and Hill completed both the corrective action and preventive measures before the end of this inspection. No further written response to this nonconformance is therefore required. (See Details Section I, paragraph B.8).