

NOTICE OF NONCONFORMANCE

Based on the results of an NRC inspection conducted on February 24-26, 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. B&W procedure NPG-0412-63 is applicable to the Nuclear Service Department and the Quality Assurance Department. Sections I and VI.F of this procedure require that all markups to technical documents, such as reports and other non-graphical information relating to the design, manufacture, procurement, test, inspection and operation of products or services provided by NPGD, shall indicate the date of the markup and the initials of the person marking the document.

Contrary to the above, the B&W Certificate of Conformance and the B&W Quality Assurance Data Package review/approval sheet (serial number 23-1103635-00) for 251 control rod drive mechanism holddown bolt assemblies were marked up without the required date of the mark up nor the initials of the person marking the document.

Refer to report section I.C.3.a. for details.

- B. Section No. 17 of the Quality Assurance Manual 19A-N.1 and Criterion XVII of Appendix B to 10 CFR Part 50 respectively state in part:

". . . Records are collected during design and procurement to furnish documentary evidence of the quality of items and of activities affecting quality . . . . The records are maintained and identified in accordance with the Records Management Manual (NPGD Records Retention Schedules and File Reference Manual 1E1). . . ."

". . . Sufficient records shall be maintained to furnish evidence of activities affecting quality. . . . The records shall also include closely-related data such as qualifications of personnel, . . . ."

Contrary to the above, personnel records which furnish documentary evidence of the qualifications of personnel performing activities affecting quality were not collected nor maintained in accordance with the Records Management Manual.

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Specific examples of the above nonconformance are as follows:

1. Existing procedures do not require documented evidence of education and experience verification of new employees performing quality related work to serve as the basis for qualification of personnel, furthermore, half of the examined sample of 12 employees hired after 1977 contained no objective documented evidence to verify education and/or experience.
2. Certain of the examined sample of employees hired after 1977 either contained no Employment Procedure Record or contained an Employment Procedure Record that was not completed although Employment Procedure 1406-A2 requires that a completed Employment Procedure Record be included in the personnel record file.
3. No objective evidence was available to confirm that Individual Personnel Jacket records were being microfilmed and stored for present employees as required by the table on Personnel Records in NPGD Records Retention Schedules and File References Manual 1E1.

See Details Section II, paragraph B.3. for additional information.

- C. Section No. 2 of the Quality Assurance Manual 19A-N.1 states in part, "The QAP (Quality Assurance Program) shall take into account the prerequisites for achieving quality, such as . . . indoctrination and training of personnel performing activities that affect quality, . . ."

Individual managers provide training for personnel under their direction in accordance with NPG 1702-22, Training of NPG Employees. Records are maintained by the personnel department that document the indoctrination and training received by personnel to the requirements of the QAP.

Contrary to the above, records documenting the indoctrination and training received by personnel performing activities that affect quality were not maintained by the personnel department in accordance with procedure NPG-1702-22.

Specific examples of the above nonconformance are as follows:

1. The Personnel Training Record form (required by NPG 1702-22) was not used to document new employee orientation.
2. Half of the examined sample of employees, hired after 1979, had not received formal group orientation (by Personnel and Quality Assurance) within 6 months after the start of employment as required by NPG-1702-22.
3. Half of the examined sample of employees, hired after 1979, had not received initial job training (by the manager of the employee) within 90 days of the date that the employees joined the organization as required by NPG-1702-22.