

NOTICE OF NONCONFORMANCE

Based on the results of an NRC inspection conducted on May 18-22, 1981, 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 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. Paragraph 4.2.1.b of the ASME accepted Quality Assurance Manual states in part, "The SDR Committee ensures completion of either Specification and Design Review, Form 2820, or all of the following forms: . . . o. Open Items Report for SDR Meeting, Form 3113"

Paragraph 4.2.1.d. states, "The Specification and Design Review Form 3119 shall not be signed off by the Technical Consultants until all SDR open items have been resolved."

Contrary to the above, Specification and Design Review Form 3119 was signed off by the Technical Consultants for Project 78P174, although the Summary of Resolution Section of Form 3113 had not been completed to denote resolution of design open items.

- B. Paragraph 2.2.12 in Section 2 of the QA Manual states in part, "The Certification Clerk has the responsibility for verifying certified material test reports in accordance with the ASME Code, Section III, Division 1"

Contrary to the above, the Certification Clerk did not verify the conformance of Oklahoma Steel certified material test reports for six inch ASME Section III Class 2 SA-352 LCB control valve bodies, Fisher Purchase Order No. S000947R, with the weld repair and postweld heat treatment requirements of Section III of the ASME Code, as evidenced by:

Subarticle NC-4620, which is referenced by Section III, Subsection NC (1974 Edition through Summer 1974 Addenda) as applicable for postweld heat treatment of weld repairs in castings, permits postweld heat treatment above the temperature range specified in Table NC-4622.1-1, i.e., 1100-1250^oC for SA-352 LCB materials, only if the welding procedure specification (WPS) and weld filler material have been qualified at the higher temperature.

Review of the vendor documentation for the castings showed that heat treatment had been performed subsequent to weld repair at both 1560^oF and in the 1100-1250^oF temperature range specified by Table NC-4522.1-1, without qualification of either the WPS or the weld filler material at the 1560^oF temperature (See Details Section II, C.3.a.(1)).

- C. Paragraph 15.3.1.f in Section 15 of the QA Manual states with respect to Machine Routing (traveler) operation sign off, "The signature of the operators on the form signifies that those operations have been properly performed and completed in accordance with the drawings and procedures/revisions indicated."

Contrary to the above, the signature of the welder for a Machine Routing hardfacing operation on a four inch ASME Section III, Class 1 Vee-Ball (Operation No. 20-1, Valve S/N 5909452, Heat and S/N D353/SN116), did not signify proper completion of hardfacing in accordance with drawings and procedures/revisions indicated, in that the operation was signed off after completion of only 50% of the required hardfacing (See Details Section II, paragraph C.3.a.(2)).