

APPENDIX A

General Electric Company
Nuclear Energy Business Operations
Docket No. 99900911/83-01

NOTICE OF NONCONFORMANCE

Based on the results of an NRC inspection conducted on February 7-11, 1983, it appears that certain of your activities were not conducted in accordance with commitments of your QA topical report as indicated below.

Section 5, "Instructions, Procedures, and Drawings," of the Topical Report NEDO-11209-04A states, in part, "Documented instructions, procedures, and drawings are utilized to communicate quality requirements throughout all phases of design, purchasing, manufacturing, and construction. Activities affecting quality, including methods of complying with 10 CFR 50, Appendix B, are delineated, accomplished, and controlled by such documents as policies, procedures, operating instructions, design specifications, shop drawings, planning sheets, test and inspection procedures, and standing instructions. Each organization performing QA-related functions, such as engineering, manufacturing and QA is responsible for the preparation, review, approval, release, application, and maintenance of its own documentation"

Nonconformances with these requirements are as follows:

- A. Engineering Operating Procedure (EOP) 35-3.00, "Engineering Tests"; EOP 25-4.00, "Work Authorizations"; GE NEBG Product Qualification Requirements (PQRs) 22A7009; and other documents collectively identify required engineering documents and data needed for formulating and conducting engineering qualification tests. Schedules or matrices in these documents identify the sequence in which the documentation should be compiled and approved. Typical basic engineering documents which require approval in preparation for tests include Product Performance Specifications (PPSs), Product Analysis Reports (PARs), and Engineering Work Authorizations (EWAs). PQR 22A7009, paragraph 4.1.2, states, in part, ". . . Both the PPS and PAR must be prepared prior to start of qualification."

Contrary to the above, environmental qualification testing activities, such as baseline functional testing and thermal aging of main steam isolation valve (MSIV) limit switches, were initiated before the review, approval, and issuance of the Product Performance Qualification Specification (PPQS) 22A5768, PAR No. 22A8460, and EWA No. EAJ08-22, documents which contain the environmental criteria under which the test was to be performed.

- B. EOP 42-6.10, "Engineering Document Issue and Application," states, in part, ". . . systematic review is required prior to the issue and application of corporate numbered engineering controlled documents or application of already issued documents . . . Maintain record copies of issued document and ERM."

Contrary to the above, a copy of the Engineering Review Memorandum (ERM) for a GE controlled document, PPQS 22A5768 for the MSIV limit switch environmental qualification test that was in progress, was not maintained and not retrievable from the record files.