

APPENDIX A

General Electric Company
Nuclear Energy Business Operations
Docket No. 99900403/82-02

NOTICE OF NONCONFORMANCE

Based on the results of an NRC inspection conducted on June 7-11, 1982, it appears that certain of your activities were not conducted in accordance with your commitments.

Section 5 of Topical Report No. NEDO-11209-04A, Revision 3, dated August 1981, 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."

Nonconformances with these commitments are as follows:

- A. Section 4.3.b.5 of Engineering Operating Procedure (EOP) 45-4.00 (Engineered Equipment Supplier Document Review) states in part, the responsible engineer is responsible to "Assure that supplier documents and transmittals to be approved, satisfy requirements by conducting reviews that include, but are not limited to: . . . 5. Signing supplier documents and transmittals as follows: a) Approved - when the document meets the technical requirements." In addition, Section 1.1 of EOP 45-4.00 states, "Documents submitted by suppliers of engineering services and engineered equipment are reviewed to assure that they fully satisfy Purchase Order requirements."

Contrary to the above, a supplier-submitted drawing (Atlas Industrial Manufacturing drawing D-4532-6, Revision 6) for the 26-252 Fuel Pool Heat Exchangers for Grand Gulf was reviewed and approved by GE even though the setpoints for the heat exchanger relief valves (tube and shell side) were specified to be set at a pressure 10% above the design pressure. The purchase order that included those values (Specification for Heat Exchanger, Fuel Pool, Z1A9520) invokes ASME Code, Section III, 1974 Edition, Winter Addenda requirements, which state the set pressure of pressure relief devices shall not be greater than the design pressure of the protected system.

- B. Nuclear Energy Business Group Procedure 70-42 (Reporting of Defects and Noncompliance under 10 CFR Part 21 or Part 50.55(e)) states in part: "The written (Part 21) report shall include, but need not be limited to,

the information specified in Appendix B, Subparagraphs B.1 through B.7." Appendix B requirements are as follows:

"This report shall include:

- "(1) Identification of the facility, the activity, or the basic component supplied for the facility or such activity within the United States which fails to comply or contains a defect.
- "(2) Identification of the firm constructing the facility or supplying the basic component which fails to comply or contains a defect.
- "(3) Nature of the defect or failure to comply and the safety hazard which is created or could be created by such defect or failure to comply.
- "(4) The date on which the information of such defect or failure to comply was obtained.
- "(5) In the case of a basic component which contains a defect or fails to comply, the number and location of all such components in use at, supplied for, or being supplied for one or more facilities or activities.
- "(6) The corrective action which has been, is being, or will be taken, the name of the individual or organization responsible for the action, and the length of time that has been or will be taken to complete the action.
- "(7) Any advice related to the defect or failure to comply about the facility, activity, or basic component that has been, is being, or will be given to purchasers or licensees."

Contrary to the above, a General Electric 10 CFR Part 21 report relating to a defect in selection of instrument range for reactor vessel water level transmitters and trip units submitted on August 19, 1981, did not include the following:

1. Identification of the firm constructing the facility or supplying the basic component which fails to comply or contains a defect.
2. The number of all such components in use at, supplied for, or being supplied for one or more facilities or activities.
3. Any advice related to the defect or failure to comply about the facility, activity, or basic component that has been, is being, or will be given to purchasers or licensees.