

APPENDIX A

The Babcock & Wilcox Company
Docket No. 99900400/82-02

NOTICE OF NONCONFORMANCE

Based on the results of an NRC inspection conducted on May 17-21, 1982, it appears that certain of your activities were not conducted in full compliance 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 this criterion are as follows:

- A. Section VI.A and Exhibit A of Nuclear Power Generation Division (NPGD) procedure NPG-0310-42, "Preparing and Processing Fuel Cycle Design Requirements" states in part, "The Fuel Cycle Design Requirements (FCDR) list contractual requirements . . . which relate to design, capability, and description of the reload core . . . (the) Nuclear Steam Core (NSC) Project Manager . . . originate(s) Fuel Cycle Design Requirements Form, BWNP-20512. Enter(s) on form . . . information, as applicable . . . Sign(s) form"

Contrary to the above, the NSC Project Manager for the Sacramento Municipal Utility District (SMUD) Rancho Seco Project did not originate FCDR 89-1127000-01, enter applicable information on the FCDR, nor sign the FCDR for fuel reload cycle 6.

Corrective action and preventive measures were completed or committed before the end of this inspection and no further written response to this item is necessary.

- B. Section VII.A.1 of NPGD procedure NPG-0412-66, "Release of Product Documentation" and related form 20032A-7 state in part, "The Document Release Notice (DRN) is a form designed to release NPGD approved documents For preparation of the DRN, see Forms Section Manual." Form 20032A-7 states in part, "The Originator shall enter . . . Product Upgrade List (PUL) Status - Enter Y (yes) if PUL is necessary - Enter N (no) if PUL is not necessary . . . in the appropriate place on the form."

Contrary to the above, the originator of DRN's for released NPGD approved documents (86-1123301-00, 86-113252-00 and 86-112788-00) did not enter

either "Y" or "N" in the appropriate place on the DRN's, thereby making the status of the product indeterminate.

Corrective action and preventive measures were completed or committed before the end of this inspection and no further written response to this item is necessary.

- C. Section VIII and Appendix I of NPGD procedure NPG-0310-38, "Historical Document List (HDL)" state in part, "The HDL . . . serve(s) as an index to the safety-related records in the Records Center . . . (to) identify applicable, approved documents used in the design, procurement and construction of safety-related services or items at any level of assembly . . . The following NPGD prepared documents are considered safety-related if they are released for use on safety-related systems, equipment, parts or services: . . . Procurement Authorizations (PA)"

Contrary to the above, the HDL did not serve as an index to safety-related PA records in the records center as evidenced by the fact that PA's 83-768661-00 through 83-768661-09, related to the design and procurement of MK-B5 fuel assemblies and axial blanket fuel assemblies for the SMUD Rancho Seco Cycle 6 fuel reload, were not identified on the HDL.

- D. Section VII.A.1 of NPGD procedure NPG-0402-01, "Preparing and Processing NPGD Calculations" states in part, "The first page of the calculation package shall be a calculation data/transmittal sheet (CDS - BWNP-20210)." Section 1.0 of Appendix 1 requires that the calculational data/transmittal sheet (CDS), (B&W form CDS-BWNP-2010) be completely filled out. The CDS form contains a section titled "Summary of Results (Include DOC ID's of Previous Transmittals & Source Calculational Packages for This Transmittal)." Instruction 7.0 for completing this section of the CDS form states "Summary of Results - Self-explanatory."

Contrary to the above, the first page of calculations 32-1119748-00, and 32-1122317-00 did not have a completely filled out CDS form. The section of the form titled "Summary of Results" did not contain a summary of the results of the calculations.

- E. Section VII.A.9 of NPGD procedure NPG-0402-01 states in part, "Summaries of calculation package results may be transmitted to users using a CDS form . . . and be reviewed and released in accordance with the procedure" Further, section VII.C of NPGD procedure NPG-0412-66 states in part, "The Product Upgrade List (PUL) is used to indicated needed changes/additions known at the time of release, or to indicate input requirements unavailable at the time of release"

Contrary to the above, PUL's were not used to indicate needed changes/additions known at the time of release, or to indicate input requirements were unavailable at the time of release, for safety-related calculation

summary packages (e.g., 86-1123144-00). These documents were various types of calculation summaries (e.g., 32-1122317-00), which were known at the time to have a PUL relating to the need for verification of source data/references outstanding against it. Further, these design documents were reviewed, released, and transmitted to users without any indication that changes may be required as a result of clearing the PUL's that were outstanding.

- F. Section B of NPGD procedure NPG-0310-38 states in part, "The following are the only documents listed on the HDL: . . . Safety-related NPGD design and supplier technical documents which have been approved and released after June 15, 1975" Section VII.C of NPGD procedure NPG-0412-66 states in part, "The PUL . . . is used to indicate needed changes/additions known at the time of release, or to indicate input requirements unavailable at the time of release Release administration shall distribute the PUL in accordance with distribution shown on the PUL form. A copy of the PUL (including revisions) is associated with the document to be revised and retained in the Records Center until all items listed on the PUL have been resolved."

Contrary to the above, certain PUL's issued from January 1981, to March 1981, which are NPGD safety-related design documents indicating that the review/verification of all source documents for the affected safety-related calculations has not been completed at the time the calculation was approved and released, were:

1. Not listed on the HDL against the affected calculations;
2. Not distributed by Release Administration; or
3. Not associated with the document to be revised and retained in the Records Center.