

APPENDIX A

Combustion Engineering,
Incorporated
Docket No. 99900401/82-04

NOTICE OF NONCONFORMANCE

Based on the results of an NRC inspection conducted on October 25-29, 1982, it appears that certain of your activities were not conducted in accordance with NRC requirements as indicated below:

Section 17.5, "Instructions, Procedures and Drawings," of the Combustion Engineering Topical Report CENPD-210-A, Revision 3, states, in part, with respect to Quality Assurance of Design Procedures (QADPs), "Quality-related activities are documented through written operating procedures, which include QADP's, WQC's, and QAP's.

"The QADP's contain procedures, policies, guidelines, and specific detailed instructions which govern activities associated with quality."

QADP No. 5.7, Revision 3, Section 1.4.1.3 states with respect to Field Action Requests (FARs), "Type 3 FAR's - These are FAR's initiated within Windsor engineering to document a problem and its solution which requires field modification to delivered components or installed systems." Section 2.4.1 states, in part, "Where a significant design change has been identified resulting from a deficiency, omission or error, the cognizant engineering organization: (1) conducts a review to determine the cause and recommends appropriate corrective action to prevent recurrence; (2) determines if there are other projects to which the change may also be applicable; . . . (4) determines if changes are required in the design process as described in QADP 5.0 or in the quality assurance of design procedures to prevent similar types of deficiencies or errors from recurring." Section 2.4.2 states, "The results of this review are documented and forwarded to senior management and the Corrective Action Program (CAP) group of the System Engineering Department. The results of the review are also forwarded to Engineering Quality Assurance when it is determined that changes to the design process or quality assurance of design procedures are required to prevent recurrences."

Contrary to the above, the shoulder gap modification of Batch C assemblies for Arkansas Nuclear One, Unit 2 was accomplished without the implementation of the design change control procedure, as evidenced by:

- (1) A FAR was not issued to document the problem and its solution.
- (2) No documentation was available which would indicate that a review had been performed in regard to: (a) determination of the cause and corrective action, (b) applicability to other projects, and (c) determination if changes were required to the design process to prevent similar deficiencies.