

APPENDIX B

Harnischfeger Corporation  
Docket No. 99900088/82-01

NOTICE OF NONCONFORMANCE

Based on the results of an NRC inspection conducted on October 18-22, 1982, 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. Quality Assurance Manual, Section 5.0, "Instructions, Procedures and Drawings," Revision 0, paragraph 5.4.5 states, in part, "Technical service groups such as Materials Engineering . . . are responsible to provide . . . procedures necessary to assure that adequate supporting data and direction is provided to those responsible for performing activities affecting quality."

Contrary to the above, a review of testing equipment in the materials engineering laboratory revealed that procedures did not exist for two types of hardness testing; i.e., Tukon Hardness Tester and the Detroit 3000 kgs H.B-2 Brinell Hardness Tester.

- B. Quality Assurance Manual, Section 12.0, "Control of Measuring and Testing Equipment," Revision 0, paragraph 12.5 states, in part, ". . . test equipment shall be calibrated at prescribed intervals . . . ."

Paragraph 12.6 states, in part, "Records shall be maintained . . . to indicate calibration status."

Contrary to the above, a review of testing equipment in the materials engineering laboratory revealed that the Rockwell Model 3YS Hardness Tester (No. 0754), Tukon Hardness Tester (No. 0623), and Wilson Model 5JR BB Hardness Tester (No. 0755) had exceeded the calibration due date indicated on the equipment calibration stickers. In addition, there were no calibration records for the testers.

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- C. Quality Assurance Manual, Section 17.0, "Quality Assurance Records," Revision 0, paragraph 17.6 states, in part, "All quality records shall be retained for a period of ten (10) years . . . Typical Quality Records . . . g. Personnel qualification . . . ."

Procedure A-S-3, "Welding Personnel Qualification Records," dated February 19, 1979, paragraph 4.6.7 states, "Supervision shall maintain record cards for the 2 most recent years."

Paragraph 4.6.9 states, "Quality Assurance Dept. shall maintain a file of record cards for 10 years."

Contrary to the above, a review of Welder/Welding Operator Qualification Records revealed the following:

1. A qualification test record for submerged arc welding (SAW) was missing for a welder whose supervisor had initialed and dated the qualification record card that he was qualified for SAW, and had used this process in 1980 and 1981.
  2. Qualification record cards were missing for the years 1980 and 1981 for one welder, and for the year 1979 for another welder.
- D. Procedure CSP-45-T, "Documentation and Quality Assurance of Painting," December 1, 1976, states, in part, "The Harnischfeger Corporation is required . . . to provide documentation . . . The forms to be used will be . . . Q.A.P. 6 - Coating Inspector Qualification Record . . . ."

Contrary to the above, a review of painting records for four nuclear projects revealed that three individuals had performed final inspection on paint coatings, and there was no documented evidence (i.e., forms Q.A.P. 6) that they were qualified.

- E. Procedure W-Q-4, "Calibration of Welding Power Sources," December 5, 1979, paragraph 6.2 states, in part, "All power sources will be recalibrated once a year."

Paragraph 6.4 states, "The Welding Maintenance Department will maintain a record book on the calibration of power sources."

Contrary to the above, a review of calibration activities revealed that calibration records did not exist for welding equipment prior to 1982, although the inspector was told that the equipment had been calibrated.