

APPENDIX A

Robertshaw Controls Company  
Fulton Sylphon Division  
Docket No. 99900722/83-02

NOTICE OF NONCONFORMANCE

Based on the results of an NRC inspection conducted on August 8-12, 1983, it appears that certain of your activities were not conducted in accordance with NRC requirements as indicated below:

- A. Paragraph II.A of Robertshaw Controls Company letter dated May 25, 1983, states, "In-process inspection has been brought into full compliance with paragraph 5.2 of the Robertshaw Controls Company Policy and Procedure Manual. Inspection is being performed by lot sampling, and results recorded on Form F-269."

Paragraph 5.2 of the Quality Policy and Procedures Manual (QPPM) requires, ". . . (3) lot inspection 100 percent or sample recorded on Form F-269."

Contrary to the above, in-process inspection had not been brought into full compliance with paragraph 5.2 of the QPPM as evidenced by the failure to perform the required inspection of the 5/8-inch diameter characteristic for the Shop Order 33928 stem assembly and the four stem assemblies contained in Shop Order 34582.

- B. Criterion V of Appendix B to 10 CFR Part 50 states "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawing, or 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."

Paragraph 1.2.2 of ANSI B16.5-1977 states, in part, "A flange or flanged fitting used under the jurisdiction of the ASME Boiler and Pressure Vessel Code, the American National Standard Code for Pressure Piping, or a governmental regulation is subject to any limitation of that code or regulation . . . ."

General Note of Figure X1-3120-1 to Section III of the ASME Code states, in part, "Fillet radius "r" to be at least 0.25 g<sub>c</sub> but not less than 3/16 inch . . . ."

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Contrary to the above, machined 5-inch, 150-pound ASME Section III Code Class 3 regulating valve bodies were noted to not contain the ASME Code required radius at the flange hub. Review of the applicable drawing (i.e., No. N-20135-D1, Revision B) showed that a radius requirement had not been specified at this location.

- C. Criterion V of Appendix B to 10 CFR Part 50 states, in part, "Activities affecting quality shall be prescribed by documented . . . procedures, . . . and shall be accomplished in accordance with these . . . procedures . . . ."

Paragraph 3.1.8 of the Quality Policy and Procedures Manual states, "Gage Laboratory personnel will make periodic inspection on all gages used for acceptance purposes. The frequency of such inspections is based upon the usage, type of gage, and product tolerance. Permanent records of these periodic inspections shall be maintained and the frequency changed only when experience proves the change is warranted."

Contrary to the above, only a small percentage of gages scheduled for periodic inspection from August 1 to August 10, 1983, had been inspected by the Gage Laboratory personnel.