

NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted on July 17-21, 1978, it appeared that certain of your activities were not conducted in full accordance with NRC requirements as indicated below:

- A. A Texas Pipe Bending Company corrective action response letter dated October 18, 1977, states in part with respect to item I.E.3.a.(2) of IE Report No. 77-04, "The nuclear sketches utilizing this heat of submerged arc welding materials are being reviewed for adequacy Based on progress made at this point, we anticipate completion of our review by November 15, 1977, which will if necessary, be forwarded to the AE for evaluation and disposition. . . . The qualification of welding materials . . . are presently being reviewed by a qualified individual other than the individual or group responsible for the initial preparation. The type and extent of this review shall and is now being documented."

Contrary to the above:

1. Inadequacies in nuclear sketches shown by review were not forwarded to the AE for evaluation and disposition, e.g.
 - a. Weld metal tensile strength (68,700 p.s.i.) below 70,000 p.s.i. minimum requirement of applicable base material specification in four (4) assemblies.
 - b. Inadequate weld metal toughness documentation in twenty-nine (29) assemblies relative to ASME Code requirements.
 2. Documentation of an independent review of welding material qualifications could not be located for a sample of four (4) items selected by the inspector from the current approved welding material list.
- B. A Texas Pipe Bending Company corrective action response letter dated October 18, 1977, states in part with respect to item II.C.3.a.(2) of IE Report No. 77-04, ". . . A new procedure was introduced to assure that all spool sheets had, in fact, been transmitted to QA/QC for 'Hold' points. The additional check point was added at the final release of the spool sheets from Engineering. This is accomplished by furnishing a copy of all transmittals, returned by QC and signed by the ANI to the Engineering Clerk. . . ."

Contrary to the above, a copy of the transmittal returned by QC for Job No. N571M-3, sheet 75, was not furnished to the Engineering Clerk.

- C. Criterion IX of Appendix B to 10 CFR 50 states in part, "Measures shall be established to assure that special processes, including welding, . . . are controlled and accomplished by qualified personnel using qualified procedures in accordance with applicable codes, standards, specifications. . . ."

Paragraph 5.4.3.3. in Section 5 of the QA Manual states, "Materials used for temporary attachments shall be identified as suitable for welding. The attachment and removal operations, including any required NDE shall be documented."

Contrary to the above, the inspector observed a temporary attachment welded to Job No. N1789, sheet 308, which was not identified as suitable for welding and for which the attachment operation had not been documented.

- D. Criterion IX of Appendix B to 10 CFR 50 states in part, "Measures shall be established to assure that special processes, including welding, . . . are controlled and accomplished . . . in accordance with applicable . . . criteria. . . ."

A Texas Pipe Bending Company corrective action response letter dated September 20, 1977, states in part with respect to welding program commitments, ". . . As part of the Welding Control program for ASME Section III work, the selected welding stations must be checked monthly by the Maintenance Department. . . . These checks must be documented and records kept for NRC review. . . ."

Contrary to the above, the inspector observed on July 18, 1978, that the last recorded maintenance check of a selected welding station (P-279) was on May 3, 1978.