Union Pump Company
Docket No. 99900248/78-02

NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted on July 18-21, 1978, it appeared that certain of your activities were not in full compliance with NRC requirements as indicated below:

A. Criterion XV of Appendix B to 10 CFR 50 states in part, "Measures shall be established to control materials, parts or components which do not conform to requirements . . . . These measures shall include . . . procedures for identification, documentation, segregation, disposition, and notification to affected organizations."

QA Manual Section 10, paragraph 10.4, states in part, " . . . The top half of the red "Hold" tag, is placed on the item at the time the nonconformity is discovered and remains on the item until the resolution of the non-conformity is complete. The bottom half of the tag is attached to the Quality Control copy of the Non-Conformity Report."

QCR 4406-4, Paragraph 4.0 states, "The Non-conformity Report number shall be noted on the Hold tag and the Hold tag number shall be noted on the Non-Conformity report."

Contrary to the above, a review of four (4) recent non-conformity reports (NCR) and their associated hold tags revealed that, in two (2) cases, hold tag numbers were not noted on the NCRs and the NCR numbers were not noted on the hold tags.

B. Criterion XIII of Appendix B to 10 CFR 50 states in part, "Measures shall be established to control the handling, storage, . . . of material and equipment in accordance with work and inspection instructions to prevent damage or deterioration."

QA Manual Section 18, paragraph 18.1 states in part, "Procedures shall be established to control and prescribe methods . . . to prevent damage and/or deterioration."

QCR-4413-0 states in part, "Overhead cranes are checked quarterly . . . . Operating mechanisims, chains, slings, lubrication, etc. are examined in accordance with attached checklist. Inspection schedule checklist will be available for review."

Contrary to the above, quarterly crane inspection schedule checklists were not available for review and discussions with the Manager of Manufacturing Planning and the Safety Engineer revealed that the

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quarterly dye penetrant examinations of crane hooks, as required by the inspection schedule, have not been performed since the issuance of procedure QCR-4413-0, dated March 31, 1975.

C. Criterion III of Appendix B to 10 CFR 50 states in part, "Measures shall be established to assure that applicable . . . requirements . . . are correctly translated into specifications, drawings, procedures, and instructions. These measures shall include provisions to assure that appropriate quality standards are specified and included in design documents. . . ."

QA Manual Section 4, paragraph 4.3.1 states, "The Nuclear Product Manager, the Quality Control Manager, and the Manager of Product Engineering shall correctly translate customer and code requirements on the engineering order form based on information from customers purchase order and owner's design specification." Paragraph 4.3.2 states in part, "Quality Control Manager shall transmit quality requirements to Engineering for incorporation into Engineering design documents. . . ."

Contrary to the above, Union Pump Company (UPC) failed to include a minimum wall measurement verification, as required by the customer, on the Fluid Cylinders for twelve (12) Hydrazine Metering Pumps on Order Number N770777.

D. Criterion VI of Appendix B to 10 CFR 50 states in part, "Measures shall be established to control the issuance of documents, such as instructions, procedures, and drawings, including changes. . . . These measures shall assure that documents, including changes, are reviewed for adequacy and approved by authorized personnel . . . ."

QA Manual Section 4, paragrpah 4.4 states in part, "Finished drawings and bills-of-materials will bear approvals by Quality Control Manager and the Project Engineer." QA Manual Section 7, paragraph 7.3.1 states in part, "The review and approval of changes or revisions to procedures, specifications, and drawings is also the responsibility of the Quality Control Manager."

Contrary to the above, a review of eight (8) pressure boundary drawings and their revisions for Order Number N770777 revealed that three (3) issued drawings had not been approved by the Quality Control Manager, i.e.: Power Frame Drawing, Revision A, dated March 1, 1978; Stuffing Box Drawing, Revision B, dated September 20, 1976, and the Stuffing Box Gland Drawing, Revision 0, dated September 14, 1976.

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E. Criterion VIII of Appendix B to 10 CFR 50 states in part, "Measures shall be established for the identification and control of materials, parts, and components. . . . These identification and control measures shall be designed to prevent the use of incorrect or defective material, parts, and components."

QA Manual Section II, paragraph 11.4 states in part, "All acceptable material in the hold area is tagged with a red Nuclear Part Tag. When material is assigned to a specific job, the red Nuclear Part Tag is replaced with a green Nuclear Part Tag which stays with the material until released for manufacture."

Contrary to the above, more than 100 pieces of bar stock, pipe and plate out of about 250 pieces of acceptable material in the hold area were not tagged with a red or green Nuclear Part Tag.

F. Criterion VIII of Appendix B to 10 CFR 50 states in part, "Measures shall be established for the identification and control of materials, parts, and components. . . . These measures shall assure that identification of the item is maintained . . . either on the item or on records traceable to the item. . . ."

QA Manual Section 7, paragrpah 7.6 states in part, ". . . The Bill-of-Material is the controlling document for the preparation of process sheets. When process sheets are complete, they shall be reviewed and approved by Quality Assurance in accordance with QCR-4407."

QCR-4407-1 paragraph III, states in part, "It is the responsibility of Methods and Standards Supervisor to convert the Engineering Bill-of-Material into nuclear process sheets . . . (and to) deliver all nuclear process sheets that require material certification to Quality Control. It is the responsibility of Quality Control to review the nuclear process sheet, and . . . After all requirements of traceability and compliance to the purchase order have been satisfied, Quality Control will release the nuclear process sheet and material for manufacture. . . ."

Contrary to the above, a documentation review of eighteen (18), in-process, Stuffing Box Flanges for order number N770459, revealed that the Bill-of-Material and purchase order required the material to be SA-182 type F304 2-76, and the vendor material certifications substantiated this. However, the approved nuclear process sheet accompanying the parts, stated that the material is SA-240 type 304, which is not in compliance with the Bill-of-Material and purchase order.

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