

NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted on June 6-9, 1978, it appeared that certain of your activities were not conducted in full compliance with NRC requirements as indicated below:

- A. 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 thereto, which prescribe all activities affecting quality. These measures shall assure that documents, including changes, . . . are distributed to and used at the location where the prescribed activity is performed."

Paragraph I, of Engineering Policy and Procedure No. EPP-10, Revision B, dated May 16, 1978, indicates that certain procedures were extracted from the Parts List File and books containing the procedures had been distributed to affected organizations effective February 1, 1972. The list indicates that Electrical Assembly and Test procedures are distributed to Production, and Glass Sealing procedures are distributed to Quality Control.

Contrary to the above requirements, Test Procedures had not been distributed to Production and Glass Sealing Procedures had not been distributed to Quality Control as indicated in the distribution list.

- B. 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 thereto, which prescribe all activities affecting quality. These measures shall assure that documents, including changes, . . . are distributed to and used at the location where the prescribed activity is performed."

Paragraph VIII of Engineering Policy and Procedure No. EPP-3, Revision H, dated March 24, 1978, states in part, "When documents being affected are processes or procedures which are kept in reference books at various manufacturing stations, the ECO Clerk will remove the obsolete procedures from the books and replace with the revised document."

Contrary to the above requirements, the following obsolete procedures had not been removed from the reference books and replaced with the revised document:

1. Marking Procedure No. MP-MK-213, Revision N/C (Revision A had been released on March 22, 1978).

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2. Test Procedure No. QA-TM-193, Revision A (Revision B had been released in May 1977).
3. Test Procedure No. TP-LK-114, Revisions B and C (Revision D had been released in November 1977). Note: Revision D was also at the test station.

- C. 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 thereto, which prescribe all activities affecting quality. These measures shall assure that documents, including changes, are reviewed for adequacy and approved for release by authorized personnel. . . ."

Paragraph 1.3 of Quality Control Procedure No. SS-QC-118, Revision D, dated February 1, 1978, states, "All process sheets must be reviewed, checked and approved by the Quality Control Supervisor or his designee.


Contrary to the above requirements, Quality Control had not approved sheets 2 and 3 of Process Sheet No. 233-9, Revision B, dated May 18, 1978, for Drawing No. R31E5029G03, Module and Flange Assembly, S/N 7693E.

- 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 thereto, which prescribe all activities affecting quality. These measures shall assure that documents, including changes, are reviewed for adequacy and approved for release by authorized personnel."

Paragraph V.A.10 of Manufacturing Procedure No. MPP-6, Revision C, dated May 22, 1978, states, "Any changes to the Purchase Order shall be processed as change orders, and will require the same reviews, approvals and distribution as the original purchase order."

Sheet 223, Item 4 of South Carolina Electric and Gas Company Purchase Order No. SN-10429-SR, dated October 7, 1977, states, "Copies of purchase orders will be distributed to QA upon order placement. QA will review, initial and date their copy to verify conformance to purchase requisition."

Contrary to the above requirements, released DGO Purchase Order No. 69006-20, Revision A, dated February 14, 1978, had not been initialed and dated by Quality Assurance.

- E. Criterion XII of Appendix B to 10 CFR 50 states, "Measures shall be established to assure that tools, gages, instruments, and other measuring and testing devices used in activities affecting quality are properly controlled, calibrated, and adjusted at specified periods to maintain accuracy within necessary limits."
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Paragraph 4.3 of Quality Assurance Procedure No. QA-CP-100, Revision F, dated April 28, 1978, states in part, "A recall system using the Calibration Cards and color codes will be used for calibration of company standards and all Quality Control gages that are to be calibrated on a fixed frequency."

Contrary to the above requirements, a recall system had not been used for calibration of all Quality Control gages on a fixed frequency, as illustrated by the following examples:

1. The calibration card for Micrometer, DGO No. D807 shows a calibration frequency of six (6) months with: Calibration Due: June 7, 1977, Calibration Date: December 1, 1977.
 2. The calibration label on Dial Indicator, No. D80 shows: Calibration Date: November 4, 1977, Calibration Due: May 4, 1978.
 3. The calibration label on Dial Indicator, No. D84 shows: Calibration Due: April 4, 1978.
 4. The calibration label on the case for Micrometer No. D216 shows: Calibration Date: March 4, 1977, Calibration Due: September 4, 1977.
 5. The calibration label on Surface Plate, S/N 130411 (DcAll S/N 1304-1) shows: Calibration Date: August 23, 1972, Due Date: 1 year.
- F. Criterion XII of Appendix B to 10 CFR 50 states, "Measures shall be established to assure that tools, gages, instruments, and other measuring and testing devices used in activities affecting quality are properly controlled, calibrated, and adjusted at specified periods to maintain accuracy within necessary limits."

Paragraph 4.4 of Quality Assurance Procedure No. QA-CP-100, Revision F, dated April 28, 1978, states in part, "All gages will bear either a calibration sticker or a color dot code or a usage calibration card. This identification will designate the point of next calibration or for those gages not under the calibration system, it will designate the limited use such as "R&D Only", "Manufacturing Control Only", etc."

Contrary to the above requirements, all gages did not bear either a calibration sticker or a color dot code or a usage calibration card designating point of next calibration, R&D Only, Manufacturing Control Only, etc. Example: Timers, Flowmeters and Regulators in the Glass Sealing area.



- G. Criterion XII of Appendix B to 10 CFR 50 states, "Measures shall be established to assure that tools, gages, instruments, and other measuring and testing devices used in activities affecting quality are properly controlled, calibrated, and adjusted at specified periods to maintain accuracy within necessary limits."

Paragraph 4.5 of Quality Assurance Procedure No. QA-CP-100, Revision F, dated April 28, 1978, states in part, "A calibration sticker bearing date of calibration, date or (sic) next calibration . . . will be applied to all company owned gages or their carrying cases."

Contrary to the above requirements, calibration stickers for two (2) thermometers, located on ovens in the Electrical Assembly Area, did not bear date of calibration and date of next calibration.

- H. Criterion XII of Appendix B to 10 CFR 50 states, "Measures shall be established to assure that tools, gages, instruments, and other measuring and testing devices used in activities affecting quality are properly controlled, calibrated, and adjusted at specified periods to maintain accuracy within necessary limits."


Paragraph 4.5 of Quality Assurance Procedure No. QA-CP-100, Revision F, dated April 28, 1978, states in part, "All in-house calibrations will have the results recorded on the Applicable Calibration Card or calibration log."

Contrary to the above requirements, in-house calibration results had not been recorded on calibration cards.

- I. Criterion XII of Appendix B to 10 CFR 50 states, "Measures shall be established to assure that tools, gages, instruments, and other measuring and testing devices used in activities affecting quality are properly controlled, calibrated, and adjusted at specified periods to maintain accuracy within necessary limits."

Paragraph 4.10 of Quality Assurance Procedure No. QA-CP-100, Revision F, dated April 28, 1978, states in part, "All employee owned gages will be maintained under the calibration system. Frequency of calibration for these gages may differ. . . . An inventory by employees including results of calibration will be maintained. . . ."

Contrary to the above requirements, employee owned gages had not been maintained under the calibration system in as much as Personal Tool Calibration Records indicated past due calibrations and no results of calibration.



- J. Criterion XI of Appendix B to 10 CFR 50 states in part, "A test program shall be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures. . . ."

Paragraph 5.3 of Section 1.0, Revision 0, dated October 24, 1975, of the Nuclear Quality Assurance Manual requires Quality Assurance to "Prepare QA Job Order Review Form #QA-328. . . ."

Paragraph 3.1 of Quality Assurance Procedure No. SS-QA-144, Revision B, dated May 24, 1978, states in part, "The QA Job Order Review shall designate the test document and revision number to be used for each test operation."

Contrary to the above requirements, Job Order Review Forms had not been prepared to designate the test document and revision number to be used for each test operation for the Duke Power Company and South Carolina Electric and Gas Company Purchase Orders.

- K. Criterion X of Appendix B to 10 CFR 50 states in part, "A program for inspection of activities affecting quality shall be established and executed . . . to verify conformance with the documented instructions, procedures, and drawings for accomplishing the activity."

Paragraph 6.1 of Section 8.0, Revision 0, dated October 24, 1975, of the Nuclear Quality Assurance Manual states, "Production Control is responsible for the release for manufacture of raw materials (or partially fabricated items) for manufacturing operations. The lot number for the material will be listed on the Process Sheet as marked on the Material issued from Material Control." Additionally, paragraph 6.3 states in part, "Prior to release for manufacture by Production Control, Quality Assurance will review the raw, partially assembled, or process material. . . . The inspector will initial the process sheet next to the Lot Number to designate acceptance."

Contrary to the above requirements, the Lot Number (P/C No.) had not been listed on Process Sheet No. 221-10, dated January 23, 1978, nor reviewed and accepted by Quality Assurance prior to release for assembly of socket contact springs to the socket.

