

Commonwealth Company
1411 Opus Place
Downers Grove, IL 60515-5701

ComEd

June 16, 2000
SES-00-85

Mr. Mark Soler
Quality Assurance Manager
Holtec International Incorporated
555 Lincoln Drive West
Holtec Center
Marlton, NJ 08053

BH
Please file
with 02-A-005
Jim

Subject: ComEd Byron Station's Rerack Documentation Errors

Dear Mark:

SES has reviewed your correspondence to SES dated June 13, 2000 and UST&D response to Holtec NCR No. 9, dated 5/30/00 and finds both responses to be acceptable. This issue is considered closed, but it is SES' expectation that these documentation deficiencies are not recurring as outlined in your letter for corrective action and action to prevent recurrence statements. We will monitor these types of activities in our regular audits and assessments.

Sincerely,

Oscar Shirani 6/16/00

Oscar Shirani, PE
Supplier Evaluation Services

cc: Holtec Vendor File

70
A/S



Holtec Center, 555 Lincoln Drive West, Marlton, NJ 08053

Telephone (856) 797-0900
Fax (856) 797-0909

June 13, 2000

Mr. Oscar Shirani
ComEd
1411 Opus Place
Suite 250
Downers Grove, Ill. 60515

Reference: 1) Byron Rerack Project

Subject: Response to PIF on Documentation Errors

Dear Oscar:

As a result of ComEd identifying a number of errors on documentation packages generated by UST&D for the Byron rerack project, a Quality Program Violation (QPVF) was generated by Holtec. A summary of the results is provided below.

Cause:

Inattention to detail at both UST&D and Holtec.

Corrective Actions and Actions to Prevent Recurrence:

- 1) Correct pages. This has been an ongoing activity and is considered complete to date.
- 2) Issue E-mail training memorandum to Holtec personnel regarding responsibilities of documentation package review and issuance. Actions completed on June 12, 2000. Copy of E-mail is attached (mailed hardcopy only).
- 3) Issue NCR to UST&D to address this issue. NCR 9 was issued and addressed by UST&D. A copy is attached (mailed hardcopy only).

Mark Soler
Holtec QA Manager

UST&D RESPONSE TO HOLTEC NCR No. 9
NCR No. 9 dated 5/30/00

Description of Nonconformance:

ComEd has identified a number of errors in the rack documentation packages submitted by Holtec for the Byron rerack project. These include duplicate Boral serial numbers in the box documentation, failure to transfer welder numbers from the box documentation to the rack documentation, legibility and missing shop bill numbers. Additionally, up to date box and raw material documentation has not been submitted to Holtec in a timely manner to support individual rack documentation packages.

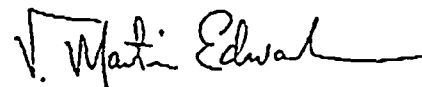
Cause:

The Root cause of these deficiencies is lack of attention to detail. Review of ComEd Special Quality Assurance Documents and ComEd Specification NEC-97-7046 indicates that many issues address in the ComEd listing of documentation package deficiencies are not nonconformance's as they are not required submittals. However, many issues are deficiencies which could have been prevented had there been more attention to detail on the part of the QA Assistant when these documents were compiled. Additionally, a thorough review of the document data packages would have uncovered many of these deficiencies.

Investigation into the cause of the duplicate boral serial numbers revealed that it was the result of improperly transposing the serial number from the boral to the box skin. As the box is fabricated, the sticker, which lists the boral serial number, is removed from the boral panel and placed on the respective cell skin. On occasion, this identification sticker is damaged in the removal process and the identification must be transferred to the skin by nuclear-grade marker. At this point, an error-prone situation exists. In all probability, this is where the identification duplication originated. At the end of the project all boral is accounted for as either used, scrapped, or excess.

Corrective Action:

UST&D QA has corrected the documentation deficiencies as they have been identified by Holtec. In the future, the UST&D QA Analyst will review all data packages and documentation produced by the QA Assistant, and this information will be forwarded to Holtec on a more timely basis. Additionally, the QC Inspectors will be advised to be more detail orientated when recording identification numbers placed on cell skins by production personnel. QC Personnel will be advised that this is an error-prone situation and could result in the duplication of numbers. This action will be completed prior to 16 June 2000.



V. Martin Edwards
Director QA, UST&D

sequential number starting with 1 for each project.)

- 4) The PM shall generate a certificate of conformance.
- 5) The original of the package shall be given to the QA Manager for final review and record storage. A copy of the package shall be submitted to the Client if required.
- 6) If a documentation package is not being transmitted , make sure you issue an internal DTF so that the document gets into the record database.

Please review the attached checklist. The questions in the checklist provide an excellent guideline for assuring the acceptability of a documentation package. You may want to send his checklist to your vendor and require them to complete it for each documentation package submitted. If you have any suggestions for modifying the checklist, please feel free to contact me.



Doccheck.doc

DOCUMENTATION PACKAGE CHECKLIST

Project: _____ Purchase Order Number: _____

Doc. Package Number: _____

Item Description: _____

REQUIREMENT	YES	NO	N/A	COMMENTS
Does the documentation package contain a certificate of compliance (conformance) from the vendor and is it traceable to the item being supplied?				
Does the vendor COC certify to the Holtec purchase order number?				
Does the vendor COC certify to the applicable Holtec drawings and the correct revisions?				
Does the vendor COC certify to applicable ECO's, DDRs, SMDRs and other miscellaneous documents with their appropriate revisions?				
Does the COC certify to the correct revision of the vendor's QA manual?				
Does the documentation package contain appropriate documentation (ie. material matrix) to allow material heat number traceability back to a BOM number and is this documentation traceable to the item being supplied?				
Are CMTRs and/or COCs available for all of the raw materials used?				
Do the CMTRs meet chemistry and mechanical requirements of the applicable codes and standards?				
Do the CMTRs for safety significant parts certify to 10CFR21?				
Are separate test reports available for any items requiring material dedication and do the results show that the item is acceptable?				
Has a material dedication certification been completed for any upgraded raw materials?				

DOCUMENTATION PACKAGE CHECKLIST

Project: _____ Purchase Order Number: _____

Doc. Package Number: _____

Item Description: _____

REQUIREMENT	YES	NO	N/A	COMMENTS
Does the documentation package contain a weld record which identifies the welder, weld procedure used, filler metal used, inspector and inspection results for each weld?				
Is the weld record traceable to the item being supplied?				
Does the documentation package contain sufficient information such that the welds described on the weld map can clearly be identified on design drawings?				
Is the weld record complete? (no blank spots)				
Are CMTRs available for each heat /lot of weld material identified in the weld record?				
Do the weld wire CMTRs contain actual chemistry and mechanical tests required by the applicable codes and standards?				
Do the weld wire CMTRs certify to 10CFR21?				
Is the weld wire used compatible with the base metals being welded?				
Does the documentation package contain NDE records for all required weld inspections of each weld and are these records traceable to the item being supplied?				
Do NDE records contain the signature of the inspector?				
Do NDE records identify the procedure and revision used?				

DOCUMENTATION PACKAGE CHECKLIST

Project: _____ Purchase Order Number: _____

Doc. Package Number: _____

Item Description: _____

REQUIREMENT	YES	NO	N/A	COMMENTS
Does the documentation package contain documentation for all required inspections and tests and is this documentation traceable back to the item?				
Does inspection and test documentation show satisfactory results?				
Does the inspection and test documentation identify the applicable procedure and revision used and are these documents approved by Holtec?				
Is inspection and test documentation complete? (no blank spots)				
Does inspection and test documentation identify the serial number of the measuring & test equipment used?				
Does dimensional inspection documentation show that the item meets design drawing requirements?				
Does the dimensional inspection documentation include the results of all critical dimensions?				
Does the documentation package contain copies of all deviations along with any supporting documentation (ie. weld repair records, inspections etc.)?				
Is the documentation package page numbered or indexed in such a manner as to assure that parts of the package could not be unknowingly removed?				
If travelers are included in the documentation package, are they complete (ie. all activities signed off)?				

DOCUMENTATION PACKAGE CHECKLIST

Project: _____ Purchase Order Number: _____

Doc. Package Number: _____

Item Description: _____

DOCUMENTATION PACKAGE CONTENT VERIFICATION

(Check if required, initial if item is included in package)

- Certificate of Conformance _____
- BOM (Material Index) _____
- CMTRs _____
- Material Heat Treat Records _____
- Holtite Test Data _____
- Concrete Test Data _____
- Lead Pour Test Data _____
- Weld Record _____
- Weld Material Test Reports _____
- Post Weld Heat Treat Records _____
- Visual Weld Examination Records _____
- Liquid Penetrant Examination Records _____
- Magnetic Particle Examination Records _____
- Ultrasonic Examination Records _____
- Radiograph Examination Records _____
- NDE (Other: _____) _____
- Load Test _____
- Drag Test _____
- Hydrostatic Test _____
- Leakage Test _____
- Pneumatic Test _____
- Plug Gage Test _____
- Dimensional Inspection _____
- Base Metal Thickness Inspections _____
- Weight Certification _____
- Paint Certifications _____
- NDE Material Certifications _____

- Other: _____

- Other: _____

- Other: _____

Preparer

Reviewer

HOLTEC INTERNATIONAL NONCONFORMANCE REPORT (NCR) ¹

PROJECT: 80944	NCR Initialization Date: 5/30/00	Serial Number:	NCR Number: 9
CLIENT: COMED			PO NO: 367585
Name:	M. Edwards	Organization:	UST&D
Name:	M. Soler	Date NCR Identified:	5/26/00
			Attachments

Description of Nonconformance:

ComEd has identified a number of errors in the rack documentation packages submitted by Holtec for the Byron rerack project. These include duplicate Box serial numbers in the box documentation, failure to transfer welder numbers from the box documentation to the rack documentation, legibility and missing bill numbers. Additionally, up to date box and raw material documentation has not been submitted to Holtec in a timely manner to support individual rack documentation packages. Copies of ComEd comments are attached (UST&D copy only, Holtec copy with QPVF 47). Holtec has been working directly with C Bolling of UST&D to correct the individual errors.

Potentially Reportable under 10CFR21: <input type="checkbox"/> no	Holtec Project Management: C. Bullard 5/30/00	Holtec QA: M. Soler 5/30/00
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This section to be completed by the organization to which the NCR was issued. The completed NCR must be returned to Holtec within fifteen working d

Cause (include root cause as applicable):

See UST&D response attached.

Corrective Action (include action to prevent recurrence & expected completion dates):

Review Checklist: N:PDOXWINWOR

See UST&D response attached.

Holtec Approval to Corrective Action (Password Controlled initials)

STRUCTURAL	THERMAL	FABRICATION	FIELD SERVICES	CRITICALITY	SHIELDING	LICENSING	PM
							C. Bullard 6/12/00

For 10CFR 71 & 10CFR 72 Components Only

Did 10CFR 72.48 screening indicate the need for an USQ determination: <input type="checkbox"/> NO <input checked="" type="checkbox"/>	Did the USQ determination (if reqd) indicate that an unreviewed safety question exists: <input type="checkbox"/> NO <input checked="" type="checkbox"/>
Does this NCR impact part 71 CoC: <input type="checkbox"/> NO <input checked="" type="checkbox"/>	

Comments:

DISPOSITION OF PROPOSED CORRECTIVE ACTION

	<input checked="" type="checkbox"/> Accept <input type="checkbox"/> Reject
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Holtec QA Signature: M. Soler 6/12/00	Expected date of Corrective Action Completion: NA	Corrective Action Follow up Required: No
NCR CLOSURE	Corrective action (if required) has been verified. This Nonconformance Report is now closed. (Holtec QA Sign & Date): M. Soler 6/12/00	
Follow up Documentation:		