

References:

- 1) Holtec Project Numbers 1024
- 2) Holtec Procedure HSP-130

Activities Performed by Holtec:

Evaluated the areas of document control, calibration, nonconformances, material control, travelers and welding using the attached checklists ( total pages= 37). The following discrepancies were identified during the audit

- ✓ 1) A DTF for revision 4 of ADS 1201 was never issued to Holtec. A Holtec DDF for this item was generated however.
- ✓ 2) The amprobe is identified as S/N MM001 in the M&TE calibration log however there are no such markings on the actual piece of equipment. Note: The calibration sticker number is listed on both the log and the equipment.
- ✓ 3) For the MT yoke, the manufacturer's serial number is 43530. Omni has etched 53530 on the part and the M&TE calibration record lists 53530.
- 4) Calibration certifications for 5332061, 5332060 and 5332013 do not certify to 10CFR50 App. B or 10CFR21.
- ✓ 5) The inspection result for the weld repair performed on NCR #134 was not checked off.
- ✓ 6) NCR#142 tag is on Unit 12 and identifies the discrepancy as lifting clamps. A hardcopy of NCR #142 was only found in the Unit 11 traveler package and the NCR s identified as a centerline problem for radial ribs. The Unit 12 package also contains a weld repair for NCR #141 however the NCR 141 red tag is on unit 11. The unit 11 package has an NCR #140 for lifting clamps that is open however there is no red tag on the unit.
- ✓ 7) Holtec NCRs 24,26 and 27 were generated by Holtec on 1/23, 2/12 and 2/15. No responses have been received from Omni. Additionally, NCR #23 which was generated on 12/20/00 is still open because the original response by Omni was not considered adequate.
- ✓ 8) Spool #31 of weld wire ( lot 593L) was found on a weld machine but there was no issuance log completed. The weld material log book showed that this spool had previously been issued and returned on 2/20/01. Spool #31 was then issued for a different lot number ( 570R) and showed that the entire spool was used.
- ✓ 9) The outer shell assembly for units 11 and 12 were not documented on the MCDS. The upper inner shell assembly for unit 11 was also not documented on the MCDS.
- ✓ 10) A Level I inspector (-Fred-) signed all IRDS and MCDS QC spaces. There was no Level II signature. The PWRP was in process however a number of the base components had been used in higher level assembly packages.
- ✓ 11) Parts from PWRP-1025-2 were marked PWRP-1025-3. This information was then transferred onto a higher level assembly MCDS ( PWRP 1200-2).
- ✓ 12) The MCDS column for releasing base component parts to a higher level assembly was not completed for 1003-3-1, 1017-3-11 and 1014-2-9 even though these parts were being used at the higher level assembly. Additionally, part 1006-3-5 did not have the ID check completed on the IRDS even though the part was being used in a higher level assembly.
- ✓ 13) Two separate PWRP packages were generated and identified as PWRP- 1017-3. The first one was issued for one part and was completed in August of 2000. The second package was issued for 30 parts and is in process. Part 1017-3-1 would be a duplicate part number for the two packages.
- ✓ 14) PWRP 1202-12 for the outer shell assembly requires inlet and outlet vent notches to be burned and inspected. All notches are cut and the inlet vents are welded to the outer shell. No PWRP sign-offs for burning or inspection were made and the IRDS had not been completed.
- ✓ 15) PWRP 1400-3: Steps for welding the tabs have not been signed for on the PWRP. Holtec has required Omni to sign all PWRP steps.
- ✓ 16) PWRP 1101-3. Steps 3-6 on the PWRP are not signed even though these activities have been completed. Two of these steps are QC steps.



Mark Soler  
Holtec QA Manager

N-5

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**Response to NCR #29**

**Cause:** Refer to attachment to NCR #29

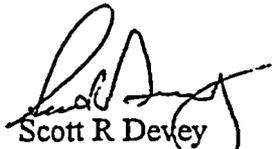
- 1) Some documents are hand carried by Holtec personnel and not faxed therefore a DTF had not been generated.
- 2) This item was overlooked when issuing serial numbers to new instruments. The item had been entered in the calibration log but the item itself had not been serialized.
- 3) The number 43530 claimed to be a serial number is in fact a part number. The serial number is 53530 however both numbers have been referenced on inspection documentation.
- 4) The review of the calibration certification overlooked the 10CFR50 App. B and 10CFR21 compliance requirement.
- 5) The QC inspector had overlooked this check-box during the completion of the form.
- 6) All NCR tags and corresponding NCR's were in the area of fabrication however some had been placed in the wrong location.
- 7) Incorrect statement. NCR's 23, 24, 26 & 27 have been responded to.
- 8) Spool #31 (Lot # 593L) had been issued in error and was not shown as a full spool returned on the log sheet.
- 9) This was an oversight on the part of the QC inspector. It is normal practice for the production staff to record these numbers and QC to verify.
- 10) The Level II or III sign-offs for Level I work is normally done upon review of the completed travelers.
- 11) The MCDS for 1025-2 was identified as 1025-3 which created the identification problem. All other traveler documents were correctly identified.
- 12) The MCDS problem was an oversight by the QC Inspector. The ID was checked on 1006-3-5 but not recorded on the IRDS.
- 13) Project management had released a duplicate PWRP in error.
- 14) This was an oversight on the part of the QC Inspector. Notches should have been inspected at the time they were initially burned.
- 15) Per the current revision of HSP-316, Para 6.2.3, "Steps on the PWRP for production activities are not required to be signed off", only the QC sign-offs are applicable. A verbal request was made by Holtec QA to have all PWRP steps signed.
- 16) At the time this NCR was generated all of piece parts had not been completed therefore the traveler steps had not been signed off.

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**Corrective Action:**

- 1) No documents will be sent via fax or hand delivery without a DTF.
- 2) This item has now been serialized.
- 3) Since there is only one MT yoke present at Omni the calibration certification will be modified to reflect both the manufacturers part number and the Omni serial number. Only the S/N: 53530 will be used on documentation from this date forward.
- 4) Temperature probe 5332013 was damaged and has been removed from service. A request will be made to Gage Lab for corrected certifications for temperature probes 5332060 & 5332061.
- 5) Verification was made that the item was acceptable and the check-box has been checked.
- 6) All tags and corresponding NCR's have been placed in their proper locations.
- 7) Corrected CMTR's for weld wire have been received from Lincoln Electric which closes out NCR 23.
- 8) This condition has been corrected on the log sheet.
- 9) The documentation has been corrected.
- 10) All completed travelers have been checked for proper Level II or III sign offs and a review of the requirement for completing Column 2 of the MCDS was performed with the Level I inspector.
- 11) The part stamping has been corrected as well as current and upper level traveler.
- 12) The MCDS has been corrected. A re-inspection of the ID on 1006-3-5 was performed and recorded on the base component IRDS.
- 13) The first issue of PWRP 1017-3 was for 1 pc. The second issue of PWRP 1017-3 was for 30 pcs. Only 4 pcs. Had been completed at the time this issue was identified. On the second issuance of PWRP 1017-3, piece #1 was crossed out and moved to the number 5 position on the MCDS and corresponding documentation. The part was re-stamped 1017-3-5. This corrects any duplication of part numbers and maintains trace ability.
- 14) The QC Inspector was able to measure the vent openings by crawling in between inner and outer shell. Subassembly traveler was updated and included with Final assembly traveler.
- 15) At present Omni is attempting to get all PWRP steps signed however a formal revision to HSP-316 is required by Holtec to make this issue enforceable by the Holtec QA program.
- 16) At present all operations through step 6 have been completed on all piece parts. QC steps have been signed off however as per CA 15 above, there is no procedural requirement for production to sign the PWRP steps.

new cc-by  
not required  
since P.O.  
is corrected  
to 4/30

  
Scott R. Dewey  
Quality Manager

# Memo

**To:** Mark Soler, QA Manager  
**From:** Joseph J. LiVecchi QC Manager  
**CC:**  
**Date:** 04/23/2001  
**Re:** Response to NCR # 29

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**Mark,**

**The following Items have been checked and found to be completed in response to your NCR # 29 issued on 3/26/2001 .**

1. Items, 1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16.

Joseph J. LiVecchi

Joseph  
QC Manager

