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Director - Spent Fuel Project Office
U.S.Nuclear Regulatory Commission
Spent Fuel Project Office, NMSS
Mail Stop: O13D13
Washington, DC 20555-001

Date: July 6, 2004

Contact: Mr. Jim Pearson

Fax No: 301-415-8555

Total Number of Pages: 2

Dear Mr. Pearson,
Per your fax dated 06/10/04, following is a list of completed and planned corrective and preventative actions (C/PAR's) for the four failures to meet NRC Regulations identified on NRC form 591S.

1. SPEC failed to document that the SPEC 150 "shell" complies with CoC requirements prior to applying the model number as required by 10 CFR Part 71.85(c).

   C/PAR 04006: The fabrication and inspection travelers for all of SPEC's packagings have been revised to required that all fabrication activities be completed, and that verification and documentation of that completion take place prior to applying the nameplate / model number.

2. SPEC's had not established shelf life requirements for foams and dye penetrant materials as required by 10 CFR Part 71.117.

   C/PAR 04008: SPEC researched the shelf life requirements for foams and dye penetrant materials. Per the dye penetrant materials manufacturer (Magnaflux), aerosol cans containing penetrant, developer and cleaner are not affected by shelf life as it pertains to the quality of the product. However, extended storage (i.e., greater than five years) may allow the aerosol propellent to leak out, thereby trapping the test media in the can. If the aerosol can is too old, the penetrant, developer or cleaner will not spray out of the can in a normal manner. SPEC's dye penetrant inspection Work Instruction (QA28) has been revised to include the above information and direct the worker that if this is the case (and the cause is

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not a clogged or partially clogged nozzle), that they discard that aerosol can and use one that sprays out properly. For foams, we created a "use by" after consulting with the distributor. The receiving inspection Work Instruction (QA05) has been revised to require recording the "use by" date on the foam, and the various travelers and Work Instructions that include the use of foam were revised to prohibit use of foam after the "use by" date. This system will augment and formalize our previous system of ordering foam "just in time" for use.

3&4 Welding rods were kept in an oven without acceptable temperature controls as required by 10 CFR Part 71.127 (special protective environments) and 10 CFR Part 71.125 (control of measuring equipment).
C/PAR 04009: The thermometer used for measuring the oven's temperature will be included in SPEC's calibrated equipment system. The storage requirements for stainless steel welding rods will be documented in the Quality System Procedure Manual, section 13.0, Handling, Storage, Packaging, Preservation and Delivery. These actions will be completed within 45 days from the date of this letter.

This document will also be mailed to your attention at the following address:
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Sincerely,

Kelley Richardt

Kelley D. Richardt
Regulatory and Quality Manager

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