

# nps industries, inc.

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October 22, 1979 DGH-242

United States Nuclear Regulatory Commission Region IV 611 Ryan Plaza Drive, Suite 1000 Arlington, Texas 76012

Attention: Uldis Potapovs, Chief Vendor Inspection Branch

Subject: Inspection of QA Program - Austin Facility

Reference: Docket No. 99900348/79-01

Gentlemen:

Attached please find NPS Industries, Inc. response to your letter dated October 2, 1979, identifying three (3) deviations and one (1) unresolved item as the result of your inspection of our Quality Assurance Program at the Austin Facility on September 4-7, 1979.

Should you have any questions regarding the attached response, please contact me.

Respectfully,

Donald Harbison

Corporate Manager of Quality Assurance

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Attachment

- cc: C. Halpern
  - L. Hovi
  - J. Barton
  - J. Gober
  - F. Galus

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a subsidiary of nuclear power services inc.

#### DEVIATION A

The internal audit log showed three (3) audits, consisting of twelve (12) findings, to be closed when in fact, nine (9) of the findings had not been signed off signifying actual corrective action (responsible person), reaudit results (auditor) and closing of the finding (Manager of QA).

## CORRECTIVE ACTION TAKEN OR TO BE TAKEN:

As noted in your report, the nine (9) findings were correctly closed out by review of supporting documentation and the obtaining of signature as required by the QA Manual.

#### CORRECTIVE ACTION TO PREVENT RECURRENCE:

Responsible personnel have been cautioned to more closely review the closure of audit findings to assure proper signatures are obtained.

DATE CORRECTIVE ACTION TO BE COMPLETED:

Was completed on September 5, 1979.

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- RESPONSE TO NRC INSPECTION - DOCKET NO. 99900348
DEVIATION B
Two (2) of six (6) WPS's, which have been released for production welding had not been approved by the Manager of Quality Assurance, and the PQR's either did not list the WPS revision or an obsolete revision was listed.
CORRECTIVE ACTION TAKEN OR TO BE TAKEN:
<ol> <li>Following the inspection, all active WPS's and the PQR's which documented their qualifications were reviewed by the Manager of Technical Services and the Manager of Quality Assurance for compliance with the ASME Code and for approval signatures.</li> </ol>
2. The review is continuing now for WPS/PQR's not in current use. This review includes the checking and re-qualification, if required, of all PQR's to verify they list the WPS Number, date and WPS revision number used when performing the qualification. Note: The NPSI Policy, which we feel is in compliance with the Code requirements, is to main- tain traceability from each WPS to the one or more PQR's which are the qualification records for the WPS(s). A PQR may serve as the qualifica- tion record for an unlimited number of WPS's or revisions of WPS's, each listing it's own unique non-essential variable, but the PQR itself documents only the single WPS (and it's welding parameters) that were used when performing the qualification.
CORRECTIVE ACTION TO PREVENT RECURRENCE:
The Manager of Technicaï Services and the Manager of Quality Assurance will review and approve by signature all WPS(s) and PQR(s) prepared in the future as required by the Code and the NPSI Program.
DATE CORRECTIVE ACTION TO BE COMPLETED:
1. Review of currently used WPS/PQR's completed on October 1, 1979.
<ol> <li>Review is continuing for WPS/PQR's not currently in use and will be completed by December 1, 1979.</li> </ol>
- Analogia 10/2/20 Corporate Manager of Quality Assurance

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# DEVIATION C

Measures were not established to assure the requirements for certification of penetrant materials were included or referenced in the documents for procurement. Certifications for penetrant materials were not available nor were they included or referenced on the purchase order.

# CORRECTIVE ACTION TAKEN OR TO BE TAKEN:

- One (1) unused case of liquid penetrant materials (developer) which did not contain a batch number was documented as being nonconforming and disposition to discard.
- 2. All other materials identified contained batch numbers and certifications have been obtained from the manufacturer of the materials.
- 3. New materials were ordered with proper requirements stated on the P.O. and received with required certifications.

CORRECTIVE ACTION TO PREVENT RECURRENCE:

Procurement personnel have been advised to procure <u>all</u> penetrant materials with proper certifications as required by the Cc'e.

# DATE CORRECTIVE ACTION TO BE COMPLETED:

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- 1. Unidentified developer discarded on September 10, 1979.
- 2. Certifications obtained for identified materials on October 15, 1979.
- 3. New materials ordered on September 24, 1979 and received on October 10, 1979 with proper certifications.

22/2 Corporate Manager of Quality Assurance

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#### UNRESOLVED ITEM:

The QA Manual does not address, nor are there procedures for the monitoring of welders performing ASME Code, production welding. It should be noted that a form is used, which allows for an inspector to check-off whether or not he verified amperage and voltage settings being used on a given power source. This is a visual observation of the power source (ammeters & voltmeters), as there were no tong meters. In addition, the QA Manual refers to the use of Work Procedure 9.3.5, for inspecting and documenting Code welding on a Weld Data Sheet and this procedure has not yet been issued.

## CORRECTIVE ACTION TAKEN OR TO BE TAKEN:

Corporate Work Procedure 9.3.5 was finalized and issued October 15, 1979, to formally define the responsibilities and documenting requirements for the Quality Control Inspector in monitoring the welding activities.

# CORRECTIVE ACTION TO PREVENT RECURRENCE:

All Corporate Work Procedures have now been completed and issued for implementation. Internal audits will be conducted as required by the NPSI Quality Assurance Program to assure compliance with the established requirements.

DATE CORRECTIVE ACTION TO BE COMPLETED:

Corporate Work Procedure 9.3.5 was finalized on October 8, 1979, and issued on October 15, 1979.

10/22/19 Corporate Manager of Quality Assurance

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