

# Automatic Switch Co.

Manufacturers of  
DEPENDABLE CONTROL  
Since 1888



FLORHAM PARK, NEW JERSEY 07932 · N. J.-(201) 986-2000 / N. Y.-(212) 344-3765

August 28, 1979

Docket No. 99900369/79-01

U.S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive - Suite 1000  
Arlington, Texas 76012

Attention: Mr. Uldis Potapovs, Chief  
Vendor Inspection Branch

Re: Nuclear Regulatory Commission Review of Automatic Switch  
Company Quality Assurance Program - July 10-13, 1979 -  
Your Letter Received July 30, 1979

Gentlemen:

We have evaluated the findings of your Mr. W. E. Foster during the subject inspection conducted at our Florham Park facility.

We feel a review of this type is most beneficial in maintaining our product standards and assuring conformance to our procedures. Although we conduct our own Quality Assurance audits periodically, the fresh approach of an outside party can uncover situations requiring improvement and/or procedures not being fully implemented.

Our Mr. L. S. Olsen, Quality Control Manager, has prepared comments and corrective action to be taken in resolving the deviations observed by Mr. W. E. Foster. If you feel the explanations require additional documentation in the form of revised procedures or completed forms, we will be pleased to comply.

The one unresolved item pertaining to a manufacturing process control procedure on "Construction Used and Coil Data" came as a shock to all in attendance at the exit interview. This is an area that we have always insisted upon in order to verify conformance to applicable assembly drawings and customer change requests. The sign-off concept has been upheld as a corporate philosophy in building a quality product by an individual who has pride in his workmanship. When the individuals record results of construction and testing they are signing their name with the knowledge of building and testing a product that conforms to applicable specifications. This procedure and documentation on individual shop orders has been in existence for at least forty years and is used to verify customer reordering for a period of twenty years in our current record keeping system. The shop order observed by Mr. W. E. Foster was an exception and we are pleased that it was uncovered.

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U.S. Nuclear Regulatory Commission  
Uldis Potapovs, Chief  
Vendor Inspection Branch

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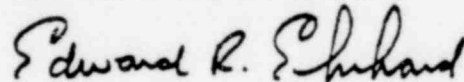
August 28, 1979

In order to prevent a recurrence of this condition, we have held meetings with all department heads, lead men, testers and Quality Control personnel to reemphasize the importance of the documentation. In addition, a new Manufacturing Department procedure "Valve Shop Order Validation" has been issued in conjunction with the Quality Control Department. The shop order form and application instructions have also been added to the Quality Control Department Form Book.

We hope you find the enclosed material satisfactory to complete your evaluation of our Company. It is our feeling that Mr. W. E. Foster was objective in his evaluation and has the knowledge to understand the variations in procedures that exist between different companies. We will be pleased to hear from you and will respond promptly to any unanswered questions.

Very truly yours,

AUTOMATIC SWITCH COMPANY



Edward R. Ehrhard  
President

ERE:jtm

Enclosures

cc: W. M. Brown  
G. A. Franklin  
R. P. Hurlburt  
H. H. Kaenmer  
L. S. Olsen  
A. W. Donaldson

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CORRECTIVE ACTION ON NUCLEAR REGULATORY COMMISSION AUDIT

OF JULY 10-13, 1979

- A. Under Paragraph 13.1.1 in our Quality Control Manual, we have stated that an individual tool record card is maintained for each instrument and we indicate that calibration results are recorded. We have not indicated that we will necessarily list actual readings since many instruments do not lend themselves to obtaining a specific reading. On Page 13 of our printed form book, we have shown a copy of the gage record card to make people aware of the type of record that is maintained on each piece of equipment. While we say that we will indicate the actual findings each time the equipment is recalibrated, we feel that this statement must not be taken literally since there are some type instruments that we do not feel it is necessary or practical to record the actual findings, whereas there are other instruments which require actual readings to determine how much wear has occurred due to the use of the instrument. We have changed the description on page 13 of our printed forms book so that it will not be necessary to list actual findings when performing calibration.

In regard to the four instruments which were listed in the deviation report, we have the following comments:

1. Torque Wrench - The gage record card does not list the actual recalibration findings; however, the gage record card does state that the actual findings are listed on a separate sheet. These findings were shown to the N.R.C. inspector at the audit. We feel that there is sufficient information on the gage card to show traceability of our actual findings when the torque gages were recalibrated. We feel that this should not be cited as a cause for deviation.
2. Thread Ring Gages - When thread ring gages are being calibrated, it is standard industry practice to use a master thread plug gage. The thread ring gage is screwed onto the master thread plug gage and the thread ring gage is adjusted to obtain the proper fit or "feel" which then determines that the thread ring gage has been properly calibrated. It is not feasible or practical to list the actual pitch diameter of the thread ring gage since it is the function of the gage inspector to obtain the proper fit on the master thread plug gage. We do not intend to list actual findings when we calibrate thread ring gages. However, as has been our past practice, the gage record card does indicate when a thread ring gage is readjusted by indicating that an adjustment was made. We feel that no deviation report should have been generated for the piece of equipment.
3. Dial Caliper - Dial calipers are considered to be a type of instrument which is subject to variations in readings depending on the feel of the individual inspector who may be using the dial caliper. We calibrate our dial calipers monthly to verify that the gage has not been damaged, dropped or subject to any excessive wear which may result in an out of calibration condition. The gage inspector picks random spots on the scale and verifies if the reading is within the allowed accuracy. If the instrument is satisfactory, it is so noted. If any adjustment or repair is required, this information is also noted. This practice has proven to be satisfactory for our needs and we intend to continue to follow our standard practice.

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4. The comments made regarding the dial caliper also pertain to our micrometer.

RESOLUTION - DEVIATION A

Corrective Action - None. We do not feel that it is necessary to change our current method of calibration.

Preventive Action - To eliminate any future conflict between the information in our Quality Control Manual (paragraph 13.1.1) and page 13 of the printed forms book, we are rewording the description on page 13. It will not be necessary to list actual findings each time equipment is recalibrated since there are many instances where it is not practical to do so.

Effective Date - The description on page 13 has been changed. It is expected that corrected copies will not be printed and available for distribution until October 1, 1979.

- B. Production Planning and Control has verified that their procedure for changing the change letters on shop orders had not been followed and this oversight is considered to be a human error. In order to assure that future shop orders will be changed properly, Production Control has assigned one individual to take care of nuclear orders. This individual has had prior experience working with this required procedure and will be responsible for making any required changes.

It should be noted that inspection documents with the proper change letters were used by the inspector during our preassembly inspection. We believe this indicates our quality system is functioning in an acceptable manner and was capable of detecting this condition so proper procedures were followed.

RESOLUTION - DEVIATION B

Corrective Action - None. Current procedures reflect required action desired.

Preventive Action - Production Control has assigned one individual to handle all nuclear orders. Any changes or modifications to an existing shop order will be made by this individual.

Effective Date - Assignment made on August 1, 1979.

- C. Our procedure MP-I-011 indicates that an enclosed, locked area is provided to accumulate and hold material being reviewed for possible rework or scrap decisions. We believe we are following the intent of our procedure, even though material was outside the locked, enclosed area when the N.R.C. inspection was completed. Frequently, there are times when material is being delivered to this area and the salvage analyst assigned to the location is elsewhere in our facilities. Therefore, it is not possible to immediately place the material in the locked area until the individual responsible comes back and opens the area. Our facilities are limited so we cannot readily expand. Material delivered is identified and personnel are fully aware of the reason why the

material is sent to this work center. Our salvage analyst endeavors to expedite the disposition of material whenever possible. Known scrap material is accumulated inside the locked area to prevent its unauthorized use. Material requiring rework is routed to designated areas with paperwork which details the necessary rework. Since we have been following this practice for many years without any difficulty, we will include a statement in our procedure MP-I-011 that material can be dropped off in front of the enclosed area.

RESOLUTION - DEVIATION C

Corrective Action - None. Current practice is acceptable and has not presented any problems in handling material subject to rework or scrap.

Preventive Action - Change procedure MP-I-011 indicating material can be dropped off in front of salvage area pending review by salvage analyst.

Effective Date - Procedure change made August 20, 1979.

Prepared By

*L. Olsen*

L. S. Olsen, Quality Control Manager

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