



ENGINEERS / FABRICATORS / CONSTRUCTORS

PITTSBURGH-DES MOINES STEEL COMPANY

NEVILLE ISLAND ■ PITTSBURGH, PENNSYLVANIA 15225 ■ PHONE: (412) 331-3000

July 20, 1979

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

Attention: Mr. Uldis Potapous,
Chief Vendor Inspection Branch

Reference: Docket 99900109/79-01

In response to the Audit of our Pittsburgh facility conducted by Mr. J. W. Sutton of your office, we have taken the following actions to correct the deficiencies:

DEVIATION A

Criterion V of Appendix B to 10 CFR states in part, "Activities affecting quality shall be prescribed by documented instructions . . . and shall be accomplished in accordance with these instructions."

Pittsburgh-Des Moines (PDM's) Corporate QA Manual, Section 7, Subsection 7.1, Fabrication Check List (FCL), states, "Upon receipt of drawings from the Plant Drawing Controller, Plant Planners shall determine the sequence of manufacturing steps necessary to produce the final shipping piece as specified on the detail drawing. These manufacturing steps shall be written on the Fabrication Check List (FCL)."

Contrary to the above, an FCL listing manufacturing steps necessary to produce personnel air lock No. 303L had not been prepared (an FCL was prepared and presented to the inspector on May 23, 1979).

Corrective Action

Fabrication Check Lists (FCL's) were used to fabricate the personnel airlock, but the FCL for the pressure test had not been generated.

The foremen, craftsmen and inspectors have been instructed that no work is to be performed without an FCL.

1431 303

7911290

350

PITTSBURGH-DES MOINES STEEL COMPANY

United States Nuclear Regulatory Commission
July 20, 1979
Page 2

Preventative Action

The fabrication FCL's have been the Production Department's responsibility and testing FCL's have been the Engineering Department's responsibility.

To prevent this type of error in the future, all FCL's will be prepared by the Production Department.

Schedule Completion

Completed.

DEVIATION B

Criterion V of Appendix B to 10 CFR 50 states in part, "Activities affecting quality shall be prescribed by documented instructions . . . and shall be accomplished in accordance with these instructions."

PDM's Corporate QA Manual, Subsection 13.5, Control of Measuring and Testing Equipment, Subparagraph 13.5.2 states in part. "Each piece of equipment shall be identified by a serial number. A tag or label shall be affixed to each piece of equipment or container showing the date of calibration and the date when the next calibration is due."

In addition, PDM's calibration procedure CP-1, Paragraph 1.4.1.2 requires each piece of measuring or test equipment to be identified with a calibration sticker.

Contrary to the above, calibration stickers were not attached to the two (2) temperature-pressure recorders, Nos. 726-EB-OY, and 808-FB-02 used for documenting the temperature and pressure during the overpressure test of personnel air lock No. 303L.

Corrective Action

An investigation was conducted to verify the calibration status of the two pressure recorders. Records were available to verify that these instruments were calibrated on May 20, 1979 and April 27, 1979.

The approved calibration "stickers" have been affixed to the instruments.

1431 304

PITTSBURGH-DES MOINES STEEL COMPANY

United States Nuclear Regulatory Commission
July 20, 1979
Page 3

Preventative Action

To prevent such an oversight from happening again, the calibration record card has been entered into the revolving recalibration file of the Q.A. Department.

Schedule Completion

The corrective and preventative action were completed on June 25, 1979.

DEVIATION C

Criterion V of Appendix B to 10 CFR 50 states in part, "Activities affecting quality shall be prescribed by documented instructions . . . and shall be accomplished in accordance with these instructions."

In addition PDM's Corporate QA Manual, Paragraph 3.5, Procedures and Specifications, Subparagraph 3.5.1.1 states in part, "The Engineering Instruction Specification (EIS) shall be the primary document specifying Engineering requirements and referencing Engineering documents."

Subparagraph 5.2.1 states in part, "The Purchasing Department shall prepare and issue Purchase Orders in accordance with the requirements delineated on Advance Bills, Change Order Sheets, Material Bills and Procurement Specifications that are received from Drafting."

Contrary to the above, the customer's specification requirement for the insulation of all power and control wiring installed in the personnel air lock No. 303L (to be qualified by passing the vertical flame resistance test as prescribed by IEEE-383-74) had not been identified in the Material Bills and Procurement Specifications or the EIS received by the Purchasing Department from Drafting. Therefore, the customer's flame resistance test requirements were not included in PDM's Purchase Order for the procurement of the power and control wire to be used in air lock No. 303L.

Corrective Action

An investigation was conducted to determine the extent of the alleged deviation. The results of the investigation show that the Engineering Department evaluated the use of the wiring and specified the needed requirements in the appropriate document to purchase the material.

1431 505

PITTSBURGH-DES MOINES STEEL COMPANY

United States Nuclear Regulatory Commission
July 20, 1979
Page 4

The requirements in the design specification were for safety related wiring. The wiring in question was light wire. The airlock door operation is totally mechanical.

The selected material, based on the usage, was specified in design documents and procurement documents. The owners, AE, reviewed and approved the use of the selected material for light wires.

There was no evidence that the PDM Quality Program had been violated.

No further action is necessary.

DEVIATION D

Criterion V of Appendix B to 10 CFR 50 states in part, "Activities affecting quality shall be prescribed by documented instructions . . . and shall be accomplished in accordance with these instructions."

PDM's Appendix A to the Corporate Q.A. Manual, Paragraph 5.12, QA Monitoring, states, "The QA Document Clerk shall monitor the activities of the Purchasing Checkers at least twice a month. A record of this monitoring shall be sent to the Division QA Manager and Purchasing Manager."

Contrary to the above, the QA Documentation Clerk is not documenting his monitoring of the activities of the Purchasing Checkers.

Corrective Action

A comprehensive audit of the Purchasing Checkers was conducted to verify that their operation was in compliance with the Code and Standards Requirements.

Preventative Action

In the future, the Assistant Division QA Manager will conduct a review of Purchasing Checkers every two weeks.

1431 506

PITTSBURGH-DES MOINES STEEL COMPANY

United States Nuclear Regulatory Commission
July 20, 1979
Page 5

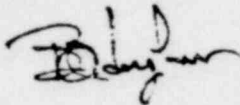
Schedule

Completed first review July 19, 1979. Continuing every two weeks in the future.

This concludes our response to the four Deviations. Should you have any questions concerning our response, we will be pleased to discuss them with you.

Sincerely,

PITTSBURGH-DES MOINES STEEL COMPANY



B. J. Hughes , QA Manager

cc: G. C. Harper

BJH/nf

1431 307