

U. S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT
REGION IV

Report No. 99900279/79-01

Program No. 51400

Company: Gould, Inc.
Distribution & Controls Division
2002 Bethel Road
Finksburg, Maryland 21048

Inspection Conducted: September 4-7, 1979

Inspector: J. R. Agee 10/30/79
J. R. Agee, Contractor Inspector
Components Section II
Vendor Inspection Branch
Date

Approved by: D. M. Hunnicutt for 10/30/79
D. M. Hunnicutt, Chief
Components Section II
Vendor Inspection Branch
Date

Summary

Inspection on September 4-7, 1979 (99900279/79-01)

Areas Inspected: Implementation of 10 CFR 50, Appendix B criteria, other NRC requirements and applicable codes and standards including: action on previous inspection findings; entrance meeting; measurements and calibration; identification and control of materials, parts or components; training and manufacturing. The inspection involved twenty-eight (28) inspection hours on site by one (1) NRC inspector.

Results: Within the five (5) areas inspected no deviations or unresolved items were identified in three (3) areas, while two (2) deviations were identified in the remaining two (2) areas and are described in the following paragraphs.

Deviations: Calibration and Measurements - calibration of instruments had been completed without provision of detailed calibration sheets. (See Notice of Deviations, Item A)

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Nonconforming Materials - nonconforming parts were being discarded into a dipository without identification as "Scrap". (See Notice of Deviation, Item B)

Unresolved Items

None.

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DETAILS SECTION

A. Persons Contacted

- R. A. Armacost - Stock Room Foreman
- *J. H. Brewer - Quality Assurance Engineer-Aide
- J. M. Hayward - Project Engineer
- G. E. Heberlein, Jr. - Manager of Development Engineering, Circuit Protection Division, Westminster Plant
- P. M. Higgins - Development Engineer, Circuit Protection Division Westminster Plant
- *J. P. Kennedy - Manager Customer Services, Applications Engineering
- J. D. Hudgins - Quality Assurance Engineer-Aide
- *W. G. Long - Operations Manager
- W. C. Speace - Industrial Engineering Manager
- T. A. Varhelyi - Test Engineer, Circuit Protection Division, Westminster Plant
- *R. P. Wathen - Quality Assurance Manager
- D. G. Wood - Industrial Engineer

*Attended the exit interview.

B. Action on Previous Inspection Findings

1. (Closed) Deviation (Report 78-01): Objective evidence records are filed and maintained in a standard storage cabinet that does not provide adequate protection for the only file or source for certain project/equipment documentation. The inspector verified, by review, that records for nuclear applications have been placed on microfilm and stored in a local fireproof vault. Records are retrievable. Duplicate copies of the original tracing are maintained in a controlled records storage area.
2. (Closed) Deviation (Report 78-01): Certain equipment marked "Out of Service" and without a calibration sticker was stored in the mechanical calibration test laboratory intermingled with serviceable test equipment. The inspector verified that "Out of Service" instruments were segregated and adequately identified. Also verified that "Out of Service" instruments had been removed from calibration records system.

C. Entrance Meeting

Per discussions with QA Department Management Personnel the Gould facilities at Westminster and Finksburg, Maryland, have been organizationally separated. The Finksburg facility, to which the Docket Number 99900279 has been assigned, will remain on the NRC IE Office inspection schedule for the production of Class 1E safety related products. Whereas the Westminster

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facility will continue to provide basic design, records retention of contract documents and measurement and calibration services, the facility will be treated as a supplier to the Finksburg Plant and will only be inspected to those three (3) QA functions under the Finksburg Plant docket number.

D. Measurements and Calibration

1. Objectives

The objectives of this area of the inspection were to verify that:

- a. Measurement and calibration services provided by the Gould, Westminster Plant represents a system that is maintained to assure that instruments and other measuring devices used in activities affecting quality are properly controlled and calibrated at specific periods to maintain accuracy within certain specified limits.
- b. Calibration records are kept for each instrument and that these records include the following information:
 - (1) Purchase date and calibration history.
 - (2) Accuracy required and calibration results.
 - (3) Location for use.
 - (4) Present calibration interval and date due.
 - (5) All maintenance and repair details.
 - (6) Persons or agency performing all calibration.
 - (7) Serial number or identification of each standard used to perform the calibration.
 - (8) Number or name of the calibration procedure.
 - (9) Environmental conditions used during calibration.
 - (10) Equipment recall schedules.

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2. Method of Accomplishment

The preceding objectives were accomplished by:

- a. Review of the QA Manual, Section XII, Control of Measuring and Test Equipment, dated November 30, 1978.
- b. Review of QAP 12.1., Control of Measuring and Test Equipment, Revision 5, dated May 31, 1978.
- c. Inspection of a random selection of instruments located in the Finksburg Plant and in the Westminster Calibration Laboratory.

3. Findingsa. Deviations

See Notice of Deviations, Item A.

b. Unresolved Items

None.

E. Identification and Control of Materials Parts or Components1. Objectives

The objectives of this area of the inspection were to verify that materials, parts or components procured or manufactured, assembled or produced for delivery to a customer are identifiable and their movement is controlled by a system, stamps, labels, documents or signatures.

2. Method of Accomplishment

The preceding objectives were accomplished by:

- a. Review of the QA Manual Section VIII, Identification and Control of Materials, Parts or Components.
- b. Review of QAP 8.0, Control of Materials, Parts or Components, Revision 2, dated June 29, 1979.
- c. Review and inspection of plant practices and the control of documentation and materials from the receipt of incoming materials to receiving inspection to the stockroom to floor-stock and final issue to manufacturing, assembly, production personnel.

3. Findingsa. Deviations

See Notice of Deviation, Item B.

b. Unresolved Items

None.

F. Training1. Objectives

The objectives of this area of the inspection were to:

- a. Verify that procedures have been prepared and approved by the company to prescribe a system for personnel training activities which is consistent with the commitments of the QA program.
- b. Determine that the procedures for training activities are being properly and effectively implemented by the company.

2. Method of Accomplishment

The preceding objectives were accomplished by:

- a. Review of QA Manual, Section II, Quality Assurance Program.
- b. Discussions with QA management personnel regarding training that has been conducted.
- c. Review of QA department training files which revealed the following training sessions had been conducted:

<u>Subject</u>	<u>No. and Type of Trainee</u>	<u>Total hours of Training</u>
(1) Familiarization with requirements for procurement document control and proper compilation thereof	9 supervisory technical clerical	9 (4/3/79)
(2) Application of QAP's in respective departments - text or aide: ANSI N45.2 P QAP 3.0 Identification and Control of Materials Parts and Components	14 "	14 (3/28/79)
(3) Shunt Trip Installation on E Frame Circuit Breaker	13 technicians	13 (1979)
(4) Switchboard assemblies and documentation	1 technician	3 (5/12/79)
(5) Legal Contracts	22 professionals	44 (10/3/78)
(6) QAP 15.3 Reporting of Product Defects. QA Manual 10 CFR Part 21	50	75 (1979)

3. Findings

Within this area of the inspection no deviations or unresolved items were identified.

G. Manufacturing

1. Objectives

The objective of this area of the inspection was to verify that manufacturing procedures had been implemented for the production of Class 1E products.

2. Method of Accomplishment

The preceding objectives were accomplished by:

- a. Discussions with Industrial Engineering Management personnel concerning manufacturing practices.

- b. Review of Industrial Engineering Procedures some of which include the following:

- (1) MQP-1 Wire Pressure Connections
- (2) MQP - Screw Terminal Connections
- (3) Stud-type Electrical Connections
- (4) Wire Terminal Crimping
- (5) MQP-101 Tooling Release Procedure

Note: Noticeably absent from the procedures reviewed were revisions reflecting improved manufacturing practices for changes in the products. Also new procedures reflecting manufacturing functions performed on Class 1E or nuclear products.

- c. Inspection of production practices which were performed in compliance with training received. Copies of applicable drawings and bills of material were available for review at the various production positions but were seldom needed since each operator had extensive experience at their respective tasks for the product being manufactured.

3. Findings

Within this area of this inspection no deviations or unresolved items were identified.

Comment: In total there appeared to be a scarcity of manufacturing quality procedures (MQPs) written to provide detailed manufacturing instructions for the products manufactured, however the inspector recognized the industrial engineering pilot program that was in progress to update manufacturing practices which should be reflected in additional MQPs.

H. Exit Interview

The inspector met with management representatives denoted in Paragraph A at the conclusion of the inspection on September 7, 1979, at the Finksburg Plant. In this meeting the inspector summarized the scope and results of the inspection including the deviations that were identified in two (2) of the areas inspected. Those areas included:

1. Action on Previous Inspection Findings
2. Measurements and calibration
3. Identification and control of materials parts or components
4. Training
5. Manufacturing

Management acknowledged the inspector's comments.