



Hirata Valve Industry Co., Ltd.

OFFICE:


9-11, 4-CHOME, SHIMBASHI,
MINATO-KU, TOKYO
P. O. BOX 121 SHIBA
TELEX: O-242-2519/HIRATA J
CABLES: "VALVEHIRATA" TOKYO
TEL: 03-(431)5176-9

MAIN PRODUCTS:

CAST STAINLESS STEEL, CAST STEEL,
FORGED STEEL & OTHER ALLOY STEEL VALVES
BANKERS: THE DAICHI KANGYO BANK LTD
THE MITSUBISHI BANK, LTD

FACTORY:

15, HISAHOTO
TAKATSU-KU, KAWASAKI
TEL: 044-(833)-2311-7

 ASME

Kawasaki, November 19, 1979
Our Ref. No. SH-356

United States
Nuclear Regulatory Commission
Region IV
Attention: Mr. Karl V. Seyfrit
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76012
U. S. A.

Gentlemen:

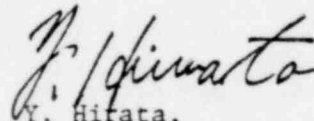
Subject: Correction of the statement

With regard to our statement of November 12, 1979, submitted to you in response to your Docket No. 99900355/79-02, we regret to inform you that some clerical errors have been found in the statement, i.e., "WPD" on line 1 of para. 2b of page 2, "(w)" on line 1 of para. 2c of the same, "rthe" in the title of para. 2 of page 4, and "Two (2) WPSs" in para. 4a of page 6.

Therefore, would you please destroy the page 2, 4 and 6 of the previously mailed, and substitute the enclosed corrected copies therefor, respectively.

We should be much obliged if you would give your prompt attention to this matter.

Sincerely yours,



Y. Hirata,
Vice President, Kawasaki Division,
Hirata Valve Industry Co., Ltd.

Enclosure: Corrected pages, 2, 4 and 6.

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Deviation "B"

1. Findings

Paragraph 5.10.3 in Section 5 of the QA Manual states in part, "The Welding Group Foreman is responsible for assuring that welders comply with the WPS and DWP by checking that the Specification parameters are being maintained. . . ."

Contrary to the above, current checks performed by the Welding Group foreman did not assure welder compliance with the WPS and DWP, as evidenced by the observation of travel speed and Tungusten electrode extension values being used in production hardsurfacing operations, that were in excess of those permitted by the applicable DWP (See Details, C.3.a.).

2. Steps that have been or will be taken by Hirata to correct the problem

- a. Hirata welding procedure specification, WPS No. HVPS-118 Rev.1, will be revised to have it provide a more realistic range with respect to hardsurfacing travel speed and Tungusten electrode extension.
The Tungusten electrode extension is not an essential variable, and the travel speed was not over 10% of the travel speed of the PQR, therefore, a revised WPS can be prepared without requalification.
- b. Hirata welding procedure specification, WPS No. HVPS-119 Rev.1, will be revised to have it provide a more realistic range with respect to hardsurfacing travel speed value which is identified as none-essential variable in the Code, therefore, the revised WPS can be prepared without requalification.
- c. The above two (2) WPSs thus revised to further revision No.2 respectively, will be submitted to Customer for review and approval, and upon receipt of the approval from the customer, the relating DWP No. 118-A18 Rev.0 and DWP No. 119-C02 Rev.0, will be revised respectively to comply with the revised welding procedure specification.
- d. The Manufacturing Section Chief gave instruction to welders to comply with specification parameters in the applicable WPS and DWP in the production operations and to the Welding Group Foreman to assure welders' compliance with the WPS and DWP by checking the specification parameters being maintained in production welding.

3. Steps that have been or will be taken by Hirata to prevent recurrence

- a. The Manufactruing Section Chief conducted training and indoctrination of the welding group personnel with regard to the importance of their being in compliance with requirements of Hirata QA Manual, WPS and DWP, and other applicable instructions.
- b. The Manufacturing Section Chief will conduct a technical audit as often as necessary to assure welders' compliance with parameters of the WPS and DWP.



Deviation "C"

1. Findings

Paragraphs NB/NC/ND - 5521 (a) in the ASME Section III Code state in part, "Personnel performing nondestructive examinations will be qualified in accordance with SNT-TC-1A "

Sub-paragraph 2 of paragraph 8.2.d. in SNT-TC-1A states with respect to the practical examination requirements for NDT Level I and Level II personnel, "At least one selected specimen shall be tested, and the results of the test shall be analyzed by the person considered for certification."

Sub-paragraph 3 of paragraph 8.2.d. states, "The description of the specimen, the test procedure, including checkpoints, and the results of the examination shall be documented." Paragraph 8.6.4. states in part, ". . . . Test objects shall be used in the practical examination, and at least 90% of the known indications should be found"

Contrary to the above, the documentation of the liquid penetrant practical examination administered to two (2) Level II personnel, did not contain either a description of the test specimen used, or the results with respect to percentage of known indications found.

2. Steps that have been or will be taken by Hirata to correct the problem

- a. In order to correct the deficiencies in documentation of the previous examination, Level III PT examiner will conduct and grade again the liquid penetrant practical examination administering to two (2) Hirata Level II PT personnel using at least one (1) selected specimen with known type and number of indications.
- b. The description of the specimen used in the test and the results of test with respect to percentage of known indications found, will be documented as required in SNT-TC-1A. These will be added to the present qualification records, which contains a checklist showing 90% of the indications found.
- c. Any specimen used in the test will be retained by the Level III PT examiner.

3. Steps that have been or will be taken by Hirata to prevent recurrence

Level III PT examiner established a new record form for liquid penetrant practical examination to Level II PT personnel, to document the test and the results of test as required in SNT-TC-1A.

4. Date corrective actions/preventive measures were or will be completed

- a. Corrective actions as stated in para.2 above, will be completed by November 30, 1979.
- b. Preventive measures as stated in para.3 above, were completed on October 12, 1979.



Deviation "D"

1. Findings

Paragraph 7.4.3 in specification NPS 0011 (Hirata Purchase Specification for Austenitic Stainless Steel Castings) states in part with respect to vendor radiographic methods, "The RT method shall accord with Hirata Procedure No. NAF-14, but shall be executed on the RT Detail Procedure that the supplier shall prepare and Hirata shall have approved"

Contrary to the above, Nippon Stainless Steel Co., Ltd. Detail Procedure, NS-C-13061 Revision 1, was approved by Hirata Valve for use on Purchase Order No. 0019, although using a radiographic method that was not in accordance with Hirata Procedure No. NAF-14 requirements, with respect to penetrameter selection and allowed geometric insharpness (See Details Section, E.3.a.(1)).

2. Steps that have been or will be taken by Hirata to correct the problem

a. for penetrameter selection:

- (1) This problem was solely caused by a misleading and inadequate description of Hirata Procedure with respect to selection of type of penetrameter. In order to clarify the requirements and to preclude users from misunderstanding of the requirements, paragraph 6.1.4.(4) of Hirata Procedure No. NAF-14 Rev.2, will be revised by an addition of "For castings: The radiographic quality level shall be 2-4T for section thickness up to and including 3/4 in. (19 mm) and 2-2T for section thickness greater than 3/4 in.." and foot note No.4 of Table 3 of the same will be deleted in its entirety.
- (2) Hirata Procedure No. NAF-14 Rev.3 thus revised, will be submitted to Customer for review and approval.
- (3) No action has been taken to correct Nippon Stainless Steel Co., Ltd. Detailed Procedure No. NS-C-13061 Rev.1, due to the fact that the procedure meets requirements called for in effect in Hirata Procedure No. NAF-14 Rev.2, and those revised and called for in the same with Rev.3.

b. Geometric unsharpness:

- (1) This problem was solely caused by an inadequate description of Hirata procedure requirements with respect to geometrical unsharpness, and in order to correct it, paragraph 6.12.13 of Hirata Procedure No. NAF-14 Rev.2, will be corrected to read: "For forgings, bars and weldments: The source-object distance shall be decided from the limited value of geometrical unsharpness given on Table 7. For castings : The source-object distance is desirous to be within the limited value of geometrical unsharpness given on Table 7."
- (2) Hirata Procedure No. NAF-14 Rev.3 thus revised, will be submitted to Customer for review and approval.



- (3) No action has been taken to correct Nippon Stainless Steel Co., Ltd. Detailed Procedure No. NS-C-13061 Rev.1, due to the fact that the Hirata's requirements with respect to geometrical unsharpness was only for reference and guideline purposes, as referenced in ASTM E-94-68, paragraph 10.4.

3. Steps that have been or will be taken ty Hirata to prevent recurrence

With respect to this particluar finding, the QA Manager conducted training and indoctrination of the personnel who would prepare Hirata Procedures and those who would review those procedures for adequacy and compliance with the Code,, and the QE Section Chief conducted those of the QE Section personnel who would review the Hirata Procedures as well as vendor's Procedures furnished for review and approval prior to application.

Documentatio of the above activities have been retained in the QA General files.

4. Date corrective actions/preventive measures were or will be completed

- a. NAF-14 Rev.3 revised as stated in para. 2 above, will be submitted to the Customer by the end of November 1979.
- b. Preventive measures as stated in para. 3 above, were completed on September 20, 1979