

**PATHWAY** BELLOWS, INC.  
A SUBSIDIARY OF CALLAHAN MINING CORPORATION

December 12, 1979

United States  
Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 100  
Arlington, Texas 76012

Attention: Uldis Potapous, Chief  
Vendor Inspection Branch

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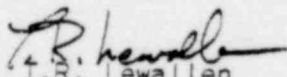
Reference: Docket No. 99900115/79-01  
NRC Region IV Letter Dated 11-14-79

Gentlemen:

Enclosed is Pathway Bellows response to the Quality Assurance Program inspection conducted by Mr. V. H. Hunter of your office on October 15 through 18, 1979.

If there are any questions, please don't hesitate to contact me.

Very truly yours,



T.R. Lewallen  
Quality Assurance Manager

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PBI RESPONSE TO NRC  
Q.A. PROGRAM INSPECTION  
ON OCTOBER 15 - 18, 1979

Deviation - A. Criterion V of Appendix B to 10 CFR 50 states: "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures or drawings shall include appropriate quantitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

Paragraph 5.8.2, Section 5 of the ASME accepted QA manual requires both the cognizant Manufacturing Planner and the Quality Engineer to sign and date the shop traveler for all changes in manufacturing sequences.

Contrary to the above requirements, manufacturing operation sequence number 205 for shop travelers N2-842, N2-846, and N2-850 was bypassed and had not been signed off by the Manufacturing Planner or the Quality Engineer.

PBI Response - 1. Steps taken to correct items:

Shop travelers for Pathway Shop Order #2872 (Units numbers listed in above deviation are for this order) have been reviewed by cognizant Manufacturing Planner and the Quality Engineer to ensure that changes in manufacturing sequences have not compromised any required Examinations, Inspections, Test and ANI or Customer Inspector hold or witness points.

2. Steps that have been taken to prevent recurrence:

The conflict between the requirement of Section 5 of the Q.A. Manual and the pre-printed note on shop travelers - "Assembly Operations are sequence optional provided that all pertinent NDE Operations have been accomplished or are accessible for subsequent examination" has been clarified by inter-office memo from Q.A. Manager to Operators and Q.A. Supervision. Q.A. Manual will be changed to eliminate conflict of requirements.

3. Completion dates:

Item 1 was completed by November 2, 1979. Inter-office memo was distributed on 12-12-79 and Q.A. Manual will be revised prior to 01-18-79.

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Deviation - B. Criterion XVIII of Appendix B to 10 CFR 50 states in part, "A comprehensive system of planned and periodic audits shall be carried out to verify compliance with all aspects of the quality assurance program and to determine the effectiveness of the programs..."

Paragraph 18.3.2, Section 18, of the ASME accepted QA manual requires that all systems within the QA Program be audited over a period of time not to exceed one (1) year.

Contrary to the above requirements, the Test Control system number eleven (11) was last audited on September 20, 1978.

PBI Response - 1. Steps taken to correct discrepancy:

Section II of Quality Assurance Manual was subjected to an Internal Audit on 11-29-79.

2. Steps that have been taken to prevent recurrence:

Auditor training session was conducted on 11-30-79 for all personnel scheduled to perform Internal Audits and the requirements of Section 18 of the Quality Assurance Manual was stressed. Internal Audit schedule was reviewed and revised on 12-10-79, ensuring that one (1) year time-frame has been met.

3. Completion dates:

Completion date for corrective actions regarding Deviation B was 12-10-79.

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