



May 2, 1979

Docket No. 99900353/79-01

Uldis Potapous, Chief
Vendor Inspection Branch
United States Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Gentlemen:

Gould Inc., Industrial Battery Division, welcomed the audit performed on February 5-8, 1979 by the United States Nuclear Regulatory Commission of our Kankakee, Illinois facility. We appreciate the very professional manner in which the audit was conducted and the auditors efficient utilization of his time and that of Gould Quality Assurance Management. Response to the deviations noted in the report and following corrective action is submitted.

- A. Provisions for a Materials Review Board were introduced into Gould's Q.A. Manual in early 1967. At that time we qualified our procedures to MIL-Q-9858 and established a Zero Defects Program in cooperation with the Department of the Navy.

Our policy, both then and now, is not to use non-conforming material for either the government or customers requiring Class IE product. Accordingly, a Materials Review Board has never convened. Our position in this area remains firm. In other areas of the Market place, manufacturing does have mechanics to have non-conforming material reviewed through Division Engineering Deviation Requests. Each request in turn is reviewed by Quality Assurance and other functional responsibilities.

The Quality Assurance Manual is currently being revised and plans call for deletion of Q.C.P. #4 - Materials Review Board.

- B. Audits referenced in deviation B. were not Q.A. Program audits as such, rather, 1) Product audit by Division headquarters...November 1975 and 2) Factory Production audits to assure good manufacturing practices... April, May, June and September 1976.

Quality Assurance program audits are performed annually with corrective action requests issued when warranted. In all cases follow-up is performed and reviewed by Quality Assurance. When corrective action is necessary resulting from a Quality Assurance program audit form Q.C. 80 is used and follow-up action within 7 days is so noted.

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GoULD Incorporated has a basic philosophy of auditing at all levels. In the Industrial Battery Division, three types of audits occur.

- 1) Production audits to assure good manufacturing practices.
 - 2) Quality Assurance audit the Q.A. program plus proper implementation and accuracy of Engineering Specifications and Factory Procedures.
 - 3) Division headquarters audits the factories for both the program and the product.
- C. The NRC deviation finding C. is correct. Although calibration data was recorded it was not done at all times in ink. Recording of data in pencil rather than ink was an oversight by our Q.A. Department. It was corrected when brought to our attention by the auditor, February 7, 1979. Follow-up audits have been subsequently made to assure continued compliance.

Sincerely,

GOULD INC.
Industrial Battery Division

L. J. Smith
Division Manager
Quality Assurance

LJS,dw/3/3

cc: T. J. Asta
E. D. Hopkins
G. E. Moon

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