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HUICO, INC.



March 30, 1979

United States
Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Attention: Mr. Uldis Potapovs
Chief Vendor Inspection Branch

Subject: NRC Audit Findings
Docket No. 99900089/79-01

Reference: NRC Letter dated March 9, 1979

Gentlemen:

In response to referenced letter in which you identified six (6) deviations in our operation, to the requirements of Criterion V of Appendix B to 10 CFR 50, we would like to describe the corrective and preventative action, and exceptions we have taken and/or will be taking. Our responses for each deviation are identified with the same item designations as used in the referenced letter.

Item A.

Corrective Action

On March 9, 1979 HUICO Engineering issued an Engineering Instruction entitled "Acceptance Receiving Procedure". This document details the procedure to be followed for the dimensional inspection of rolled plates.

Action To Prevent Recurrence

HUICO Engineering is reviewing for completeness the Standard Shop Procedure for Dimensional Inspection of Received Materials. The review will be to assure that the procedure provides the necessary guidance to allow the dimensional inspection of all sizes, shapes and product forms that HUICO, Inc. uses to fabricate Nuclear items. By June 30, 1979 the procedure will be revised as required and will at that time incorporate requirements for rolled plates.

Additionally all Q.C. Inspectors have been instructed to inform the Q.A. Manager, if they find the dimensional inspection procedure not adequate for a particular item, so that the necessary procedural instructions can be obtained from Engineering.

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HUICO, INC.

March 30, 1979

Page Two

Item B.

Corrective Action

On February 16, 1979 amendments, to the two W.P.S.'s, were issued for application which detail how the root pass welding is to be performed.

Action To Prevent Recurrence

The Senior Welding Engineer will assure that all welding parameters are addressed as required by ASME Code Section IX in the W.P.S.'s whenever changes such as deletion of the type of rod used for the root pass (as in the case of the referenced W.P.S.'s) are made. The Shop Q.A. Manager will assure that the Q.A. review of the W.P.S.'s is adequate to verify that the W.P.S.'s are complete as required by the ASME Code, Section IX. This action shall continue on all future W.P.S.'s or W.P.S. revisions.

Item C.

Corrective Action

The electrical parameters (nonessential variables) of WPS 389-500-A45 were changed by amendment February 16, 1979. This change provides the latitude needed to assure the welding quality, and was made as required and allowed by ASME Code Section IX.

Action To Prevent Recurrence

From now on the Senior Welding Engineer will pay closer attention to the nonessential variables of the W.P.S.'s to assure that the latitude necessary is provided. He shall also monitor production welding to assure that the procedure application is adhered to and that it is adequate to provide the quality required. (See "Action To Prevent Recurrence" Item E for further details.)

Item D.

Exception To Finding

Please note that prior to the exit interview there was a great deal of discussion about this finding between the HUICO Q.A. Manager and the NRC Inspector. In that discussion the Q.A. Manager pointed out to the NRC Inspector why he felt this finding was not a valid finding. Since receipt of the Inspection Report (Referenced Letter) the Q.A. Manager has further researched this subject and is still of the opinion that HUICO has not violated any criteria in this area. With an open mind please review the following reasons for this belief:

HUICO, INC.

March 30, 1979

Page Three

1. NF 4231.2 (d) (HUICO contract applicable subsubparagraph to 1974 Code, Summer 1976 Addenda) states "The surface of the support is visually examined after removal of the temporary attachment." This statement does not take you into Article NF-5000. Since it does not, it appears there are no procedural or acceptance criteria requirements. However, HUICO, Inc.'s Procedure entitled, "General Shop Welding Standard" Paragraph 9.1 does state in part "Welded attachments shall be removed by grinding, chipping or filing... and shall be examined visually for surface defects. Any defects found shall be removed..."
2. NF 4232 requirements for maximum offset are detailed in the specific welding procedure. An example is Welding Procedure 389-500-A45.
3. HUICO, Inc.'s Corporate Quality Assurance Manual, Paragraph 6.3.1, states "All welding processes are controlled by welding procedure specifications..." It also states, "The Quality Inspection Supervisor is responsible for continuous surveillance to assure adherence to these written procedures." Paragraph 7.6.1 states in part, "Manufacturing and installation welding is accomplished in accordance with qualified welding procedure specifications... the Shop or Field Quality Assurance Manager provides the quality control surveillance necessary to assure procedural compliance...". This does mean what it says and is being complied with.

Item E.

Corrective Action

Effective April 2, 1979 the requirements of the new Quality Assurance Manual, Paragraph 9.4.1 shall be in force.

Action To Prevent Recurrence

The new Quality Assurance Manual in Paragraph 9.4.1 states in part, "The Quality Control Inspector shall monitor the welding machines during operation to assure that the essential and nonessential variables of the Welding Procedure Specification are being complied with. He shall maintain a log that indicates adherence to the Welding Procedure Specification variables." This requirement will be in force on April 2, 1979.

Item F.

Corrective Action (Master List)

The new Quality Assurance Manual, which is effective April 2, 1979, more clearly describes the Master List as a generic document and the Calibration Record Cards as the more specific document. The Master List and the Calibration Cards observed by the NRC Inspector will remain as is.

426

181
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HUICO, INC.

March 30, 1979

Page Four

Action To Prevent Recurrence (Master List)

The new Quality Assurance Manual in Paragraph 12.4.1a states, "The Master List includes as a minimum, the generic equipment description, calibration frequency, and the date that recalibration is due." This requirement will be in force on April 2, 1979.

Corective Action (Thermometers)

On March 29, 1979 HUICO Engineering issued an Engineering Instruction entitled, "Thermometer Calibration". This document directs the calibration of thermometers to be in accordance with the Procedure HSSP-200-10 requirements for thermocouples. The frequency for calibration is and has been established on the Master List.

Action To Prevent Recurrence (Thermometers)

HUICO Engineering will develop a more specific procedure for thermometers to be added as Attachment to the next revision of HSSP-200-10.

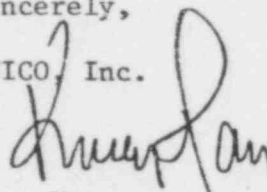
Exception To Finding (Tensile Tester)

The Tensile Tester is calibrated by the Manufacturer per the Manufacturers procedures and establish tolerances. The HUICO Master List does identify the Tensile Tester and the frequency of calibration. This piece of equipment can not be calibrated by HUICO and therefore is not addressed in the Calibration Procedure HSSP-200-10.

If you have any questions regarding this response, please do not hesitate to contact me.

Sincerely,

HUICO, Inc.



Kung Han
Vice-President and Manager

LEG/KH/rb

426 182