Division of
Pullman Incorporated

P.O. Box 3308, Reach Road
Williamsport, Pennsylvania 17701
Telephone (717) 323-9991
Telex 841416

# Pullman Power Products

November 13, 1978

**Roger E. Howard**
Vice President and
General Manager
Piping Fabrication

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

Attention: Mr. D. M. Hunnicutt
Acting Chief
Vendor Inspection Branch

Subject: Response - N.R.C. Inspection
September 25-29, 1978
Docket No. 99900021
Report No. 99900021/78-02

Gentlemen:

In response to your Inspection Report and letter of transmittal, dated October 13, 1978 (Karl V. Seyfrit to R. E. Howard), relative to the subject inspection, we respectfully submit the attached response. If, in your opinion, supplementary information is deemed necessary, we will extend every effort to comply.

Very truly yours,

R E Howard

R. E. Howard

REH/mag
Attachments

CC: T. Daniels
E. F. Gerwin
J. J. Krommenhoek

7901180359

RESPONSE TO FINDINGS - NRC INSPECTION - SEPTEMBER 25-29, 1978

DEVIATION A - PAGE 1

RECTIVE ACTION:

(1) WPS No. 27-111-8-OB-12 - An instruction sheet was issued deleting the Argon Purge for nozzle, couplings, socket or fillet welds as an immediate action measure.

As a permanent resolution all Welding Procedure Specifications have been revised to relfect no purge necessary when welding nozzles, couplings, socket or fillet welds.

An increase in amperage and voltage is not an essential variable for the subject weld procedure.

Current job procedures have been revised to reflect increased amperage and voltage under nonessential variables. Increased amperage and voltage ranges on supplementary nonessential variables have been requalified and have supporting P.Q.R.'s.

(2) The Plant Welding Engineering Department will institute a Program for Welder Training providing Program Implementation Deficiencies, Scheduling, Documentation and Applicable Areas of Review.

(3) The Quality Control Welding Inspection Surveillance Report will be revised to include reference to weld procedure specification requirements and good workmanship practices. This form will be added to The Williamsport Plant Shop Procedure No. X-10, Shop Welding Inspection Procedure. All Plant Audits will be performed by the QA Auditor - Central Staff, as indicated in The Williamsport Plant Nuclear Quality Assurance Program Manual; Section XVIII.

RECTIVE ACTION TO COMPLETED BY:

(1) The corrective measures as stated have been completed. Revised procedures have been sent to customers for approval. Upon receipt these will be incorporated into individual job procedure manuals.

(2) December 1, 1978

(3) December 1, 1978

PS TO PREVENT URRENCE:

(1) Revised procedures will prevent recurrence.

(2) Verification by QA Auditor - Central Staff Audits.

(3) Check Lists referenced by applicable procedures will be utilized. Verification by QA Auditor - Central Staff Audits.

DEVIATION A - PAGE 1 (Cont'd)

PS TO PREVENT
URRENCE COMPLETED BY:

(1) All affected WPS's have been revised as required. Appropriate implementing instructions have been sent to Shop. Revised WPS's for individual jobs awaiting customer formal approval.

(2) N/A - On Going Audit Program

(3) N/A - On Going Audit Program

DEVIATION B - PAGE 1

RRECTIVE ACTION:

(1) We have approached the designer on the subject of furnishing heavier materials to assure that after bending we do not encroach on the "mill minimum wall." They advise that the schedule numbers selected to include allowance for bending as described in Table NB/NC/ND 3642.1-1 to assure that the "calculated minimum wall" is not violated after bending. In any case when they are under "mill minimum", the actual minimum walls after bending are furnished to the designer in each case to verify acceptability.

RECTIVE ACTION TO
COMPLETED BY:

(1) December 1, 1978

PS TO PREVENT
URRENCE:

(1) For all future work, the Engineering Department has been instructed to verify that bending allowances have been accounted for by the designer in his selection of schedule numbers or minimum specified wall thickness. He will also obtain a minimum acceptable thickness for each size and schedule within each line spec. or alternatively make provisions for designer review and acceptance of actual measured wall thickness for each bend.

PS TO PREVENT
URRENCE COMPLETED BY:

(1) Complete

DEVIATION C - PAGE 2

RRECTIVE ACTION:

(1) A Training Session has been presented to NDE personnel, based on this deviation, providing instructions to verify that procedures referenced on Process Sheets are correct and applicable to process being performed. This session has been documented and is available for review.

DEVIATION C - PAGE 2 (Cont'd)

CORRECTIVE ACTION: (Cont'd)

(2) A Training Session has been presented to QA personnel providing instructions to verify correctness of procedures indicated on Revised Process Sheets; where this deviation occurred, as well as entries on original Process Sheets. This session has been documented and is available for review.

CORRECTIVE ACTION TO BE COMPLETED BY:

(1) October 31, 1978

(2) October 31, 1978

STEPS TO PREVENT RECURRENCE:

This area will become part of an On Going Training Program.

STEPS TO PREVENT RECURRENCE COMPLETED BY:

N/A

DETAILS SECTION 1 - PAGE 3 & 4 - OPEN DEVIATION - PARA. 2

CORRECTIVE ACTION:

(a) The Williamsport Plant In-Process Inspection Procedure, X-9, will be revised to include guidelines for In-Process Control Of Temporary Attachments.

(b) All Williamsport Plant Audits will be performed by the QA Auditor - Central Staff, as addressed in Section XVIII, of The Williamsport Plant Nuclear Quality Assurance Program Manual. A complete Audit Check List was not included in the sample illustrated in Procedure XVIII-1W. The complete Check List has a reference to Weld Procedure Specifications and will include a Review of Verification of Compliance.

(c) This area will be covered by Central Staff Audits as presented in The Williamsport Plant Shop Procedure No. XVIII-1W.

CORRECTIVE ACTION TO BE COMPLETED BY:

(a) November 30, 1978

(b) N/A - On Going Audits

(c) November 30, 1978

DETAILS SECTION 1 - PAGE 3 & 4 - OPEN DEVIATION - PARA. 2 (Cont'd)

STEPS TO PREVENT RECURRENCE:

(a) N/A

(b) N/A

(c) N/A

DETAILS SECTION 1 - PAGE 4 & 5 - OPEN DEVIATION - PARA. 3

CORRECTIVE ACTION:

(a) The subject welding procedure has been revised and utilization depends upon customer approval. Until such approval is obtained, the instruction sheet was issued to reflect the actual job practice in our shop.

(b) Submittal of PQR-028 as applicable to WPS No. 27-111-8-OB-12, resulted from a misunderstanding of communications. The correct PQR reference should have been PQR No. 110 and No. 119.

(c) Welding Training Sessions will be documented in training records provided by the Plant Welding Engineering Department.

(d) The Revised Quality Control Welding Inspection Surveillance Report will reference good workmanship and travel speed for submerged arc welding.

(e) A complete Audit Check List was not included in the sample illustrated in Procedure XVIII-1W. The complete Check List has a reference to Weld Procedure Specifications and will include a Review of Verification of Compliance.

CORRECTIVE ACTION TO BE COMPLETED BY:

(a) Revisions have been made and are subject to customer approval.

(b) N/A

(c) N/A

(d) N/A

(e) December 1, 1978

DETAILS SECTION 1 -PAGE 4 & 5 - OPEN DEVIATION - PARA. 3 (Cont'd)

EPS TO PREVENT CURRENCE:

(a) The revised procedures will prevent recurrence.

(b) N/A

(c) N/A - On Going Program

(d) N/A

(e) N/A - On Going Program

EPS TO PREVENT CURRENCE COMPLETED BY:

(a) Date of Customer Approval and issue to Shop.

(b) N/A

(c) N/A - On Going Program

(d) N/A

(e) N/A - On Going Program

DETAILS SECTION 1 - PAGE 6 - OPEN DEVIATION - PARA. 4

RRECTIVE ACTION:

A Procedure has been established to include submittal of Testing Requirements with Purchase Orders sent to Testing Labs.

RRECTIVE ACTION MPLETED BY:

December 1, 1978

EPS TO PREVENT CURRRNCE:

This area will come under the scope of the QA Auditor - Central Staff Audits.

EPS TO PREVENT CURRENCE COMPLETED BY:

N/A - On Going Audit Process.

DETAILS SECTION 1 - PAGE 6 - OPEN DEVIATION - PARA. 5

| | |
|---|---|
| ORRECTIVE ACTION: | All Williamsport Plant Audits will be performed by the QA Auditor - Central Staff as addressed in Section XVIII of The Williamsport Plant Nuclear Quality Assurance Manual. |
| ORRECTIVE ACTION TO E COMPLETED BY: | N/A - On Going Audits |
| TEPS TO PREVENT ECURRENCE: | Same as Corrective Action |
| TEPS TO PREVENT ECURRENCE COMPLETED BY: | N/A - On Going Audits |

DETAILS SECTION 1 - PAGE 6 - OPEN DEVIATION - PARA. 6

| | |
|---|---|
| ORRECTIVE ACTION: | All Williamsport Plant Audits will be performed by the QA Auditor - Central Staff as addressed in Section XVIII of The Williamsport Plant Nuclear Quality Assurance Manual. |
| ORRECTIVE ACTION TO E COMPLETED BY: | N/A - On Going Audits |
| TEPS TO PREVENT ECURRENCE: | Same as Corrective Action |
| TEPS TO PREVENT ECURRENCE COMPLETED BY: | N/A - On Going Audits |

DETAILS SECTION 1 - Page 6 & 7 - OPEN DEVIATION - PARA. 7

| | |
|---|---|
| ORRECTIVE ACTION: | All Williamsport Plant Audits will be performed by the QA Auditor - Central Staff, as addressed in Section XVIII of The Williamsport Plant Nuclear Quality Assurance Manual. |
| ORRECTIVE ACTION TO E COMPLETED BY: | N/A - On Going Audits |

DETAILS SECTION 1 - PAGE 6 & 7 - OPEN DEVIATION - PARA. 7 (Cont'd)

STEPS TO PREVENT RECURRENCE: Same as Corrective Action

STEPS TO PREVENT RECURRENCE COMPLETED BY: N/A - On Going Audits