

BREDA TERMOMECCANICA

SOCIETÀ PER AZIONI CON SEDE IN MILANO - CAPITALE SOCIALE INTERAMENTE VERSATO L. 9.000.000.000

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MILANO 31.1.79

Attention of Mr. U. Potapovs, Chief Vendor Inspection Branch

Docket No. 99900318/78/01

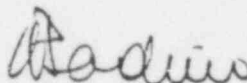
Gentlemen,

We have received on January 17, 1979 your letter (the date is missing) referring to a previous request of clarification you sent to us on September 18, 1978.

This is to inform you that we never received your letter dated September 18, 1978 and to provide for the additional information about our answers dated July 28, 1978 which you can find herewith enclosed.

We are sorry for our previous responses to your inspection report being not fully clear, and hoping that this time our answers will be fully satisfactory to you, we remain.

Yours faithfully



T. Badino

Quality Assurance Mng.

BREDA TERMOMECCANICA

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ADDITIONAL INFORMATION ON BREDA TERMOMECCANICA
CORRECTIVE ACTION PROGRAM FOLLOWING NRC INSPECTION
REPORT No 9990318/78 - C1

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Reference: your letter September 18, 1978

POINT D

Instructions for the Welding Supervisor were given by writing on July 12, 1978.

These instructions were included in a preliminary report (QUA/241/c/78) of the exit interview after the last inspection you performed in BT.

Such preliminary report was distributed together with your official inspection report to the managers of BT areas in which deviations had been found during your inspection.

Among these managers, there was the nuclear shop Supervisor, from whom the welding supervisor depends.

Afterwards, during the internal audit of BT Quality Control Activities in the nuclear shop (Internal Audit Report IA 031, dated September 9, 1978), an official corrective action was issued on September 20, 1978 (Corrective Action Report CR 177)

Such corrective action states, besides other requirements, as follows:

"The Welding Supervisor shall mark on WC forms, the expiration date of the welder qualification, according to the ASME Code".

The audit to Quality Control Department has been already planned in our 1978 Internal Audit Program, before NRC inspection to Breda.

Documentation of the audit report IA 031 and the corrective action report CR 177 are available in BT.

POINT E

For "spot audits" we intend audits which are not included in the yearly internal audit program (see BT Quality Assurance Manual, point 20.5.3)

They are performed, when the QA Manager deems it necessary, in consequence of deviations discovered during audits by external organizations.

Such audits cover only the specific deficient activity of the concerned area.

An audit to verify calibration of welding machines in the shop has been performed on August 25, 1978 (Internal audit report IA 030) inspecting 31 (thirty one) welding machines with satisfactory results. Moreover, on the report of such audit is clearly written the description of the deviation originating the unplanned internal audit ("A manual Welding Machine 12 Q 20 was found to be out of calibration period by the NRC inspector during the audit in BT shop").

However, reports of these "spot audits" are prepared and certified in the same way as those of the planned audits.

In addition to this "spot audit", during the internal audit to the Quality Control Department (IA 031 mentioned at point D), a corrective action report CR 178 was issued; the deviation states:

"Manual welding machines out of calibration period, are not identified and segregated in such a way as to prevent their uncorrect use".

The required corrective action states:

"Manual welding machines out of their calibration validity time according to ET QAM Sect 17 requirements, shall be identified by Quality Control personnel through on attached "hold" label forbidding their use before recalibration".

POINT G

A review of all Welding Procedure Specifications issued by ET for ASME jobs will be performed to verify compliance with the essential variables mentioned in the corresponding Procedure Qualification Report.

Results of this action will be recorded and available within April 1979.

Moreover, for the next revision of our Quality Assurance Manual in view of the ASME survey, it is foreseen to include the final approval of Procedure Qualification Reports by Quality Assurance personnel.

Implementation is foreseen within June 1979.

POINT F.

We thank you for accepting our explanations on the subject.