U. S. NUCLEAR REGULATORY COMMISSION OFFICE OF INSPECTION AND ENFORCEMENT REGION IV

Report No. 99900230/78-01

Program No. 51400

Company:

The Anaconda Company Wire and Cable Division Greenwich Office Park 3

Greenwich. Connecticut 06830

Inspection at: Marion, Indiana

Inspection Conducted: December 11-14, 1978

Inspection Branch

Approved by: D. M. Hunnicutt, Chief, Components Section II

Vendor Inspection Branch

Summary:

Inspection on December 11-14, 1978 (99900230/78-01).

Areas Inspected: Action on nine (9) previously identified inspection findings. Implementation of Topical Report AWC-75-A, Revision 1, dated November 1, 1976, including corrective action,; quality assurance records; and audits. The inspection involved twenty-seven (27) inspector-hours on site.

Results: In the four (4) areas inspected, no apparent deviations or unresolved items were identified in two (2) areas; the following deviations were identified in the remaining two (2) areas.

Deviations: Action on Previous Inspection Findings - Failure to take committed corrective actions/preventive measures relative to deviations at paragraphs C.3.a.(1) and E.3.a. in Inspection Report No. 77-02 (Enclosure, Items A. and C.). An additional deviation was identified during evaluation of the corrective action response letter dated December 16, 1977 (Enclosure Item B.).

Audits - Had not been conducted and reported as required by paragraph 18.3.1 of the Topical Report, and paragraphs 3.4 and 3.5 of Inspection Manual Procedure No. 700 (Enclosure, Item D.).

Performance not consistent with Criterion XVIII of Appendix B to 10 CFR 50 (Enclosure, Item E.).

Unresolved Items:

None.

DETAILS SECTION

A. Persons Contacted

R. F. Bonnett, Engineer - Quality Assurance

S. Copple, Administrative Manager - Quality Assurance

L. Floyd, Analyst - Quality Assurance

*J. Heaton, Manager - Planning and Systems

B. Huffaker, Supervisor - Technical Sales Service

- *H. Huntsinger, Technician Power Cable Quality Assurance
- D. Jessop, Engineer Chief Process
- *B. Jones, Manager Engineering

A. D. Oradat, Chief Inspector

*A. E. Rosen, Manager - Power Cable Quality Assurance

*H. A. Shaw, Manager - Operations

*G. F. Somers, Manager - Plant Quality Assurance

*R. C. Wolf, Plant Manager

*D. M. Wyatt, Manager - Sales Service

B. Action on Previous Inspection Findings

1. (Open) Deviation (Inspection Report No. 77-02): Results of verification point calibration had not been reviewed and instrument being checked and the resistor used had not been identified. The inspector found that contrary to the corrective action response letter dated December 16, 1977, a schedule of reviews had not been established and point calibrations had not been reviewed and signed off on a daily schedule. (See Enclosure, Item A.).

During evaluation of the corrective action response letter, it was determined that the individual performing verification of calibration had not annotated the necessary forms as required by various procedures. (See Enclosure, Item B.).

- (Closed) Deviation (Inspection Report No. 77-02): A system had not been implemented for the periodic calibration of timers used in determining specified times of acceptance tests. The inspector verified that timers are calibrated by an independent laboratory on an annual schedule; also, timers were observed to exhibit current calibration labels.
- 3. (Closed) Deviation (Inspection Report No. 77-02): A system had not been implemented for scheduled inspection maintenance, and

^{*}Attended exit interview.

calibration of speed measuring devices, temperature controllers and dial thermometers. The inspector observed that "For Reference Only" labels had been attached to instrumentation not being used for process control.

- 4. (Closed) Deviation (Inspection Report No. 77-02): The Quality Assurance Department had not performed secondary calibrations on Temperature Recorders and Controllers, Bridges, and Megohmeters. The inspector verified that individuals performing secondary calibrations report functionally to the Plant QA Manager for this activity.
- 5. (Closed) Deviation (Inspection Report No. 77-02): Calibration labels for large scales did not have provisions for a due date nor had the information been placed on the labels. The inspector observed that calibration labels on large scales displayed due dates.
- 6. (Closed) Deviation (Inspection Report No. 77-02): Data heing transcribed from an improvised form. The inspector objected that improvised forms were not in use and an Avoid Vertal Orders notice prohibiting the practice had been posted.
- 7. (Closed) Deviation (Inspection Report No. / __): Preliminary test squares of Process Tags had not been annotated N/A and initialed when preliminary test was not applicable. The inspector verified the applicable Inspection Notice, and all others, had been deleted from the QA Program.
- 8. (Open) Deviation (Inspection Report No. 77-02): Rework Tag did not show that inspection and test after rework had been performed. The inspector found that contrary to the corrective action response letter dated December 16, 1977, a written instruction had not been issued to Quality Assurance personnel to review each Rework Tag to verify it had been completed properly and to sign in the appropriate place after the required specification inspections and tests had been performed. (See Enclosure, Item C.).
- (Closed) Unresolved Item (Inspection Report No. 77-02): Process Tags with "Final Inspection" blocks punched out almost completely; no documented instructions existed for voiding a punch. The inspector verified a memorandum had been initiated which prohibits voiding a punch by additional punching and detailing steps for preparing new tags should the need occur.

C. Corrective Action

Objectives

The objectives of this area of the inspection were to verify that:

- a. Measures had been established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances had been promptly identified and corrected.
- b. Established measures assured that the cause of the condition had been determined and corrective action taken to preclude repetition in the case of significant conditions adverse to quality.
- c. The identification of the significant condition adverse to quality, the cause of the condition and the corrective action taken had been documented and reported to appropriate levels of management.
- Established measures had been implemented.

Method of Accomplishment

The preceding objectives were accomplished by:

- a. Review of the following Customer Purchase Orders (PO) to verify corrective action had been invoked:
 - (1) Arizona Public Service Company P.O. No. 10407-13-EM-029, dated February 14, 1977.
 - (2) United Engineers and Constructors P.O. No. 9763.006-113-1, dated May 5, 1978.
- b. Review of Topical Report AWC-75-A, Revision 1, Sections 15, and 16, dated November 1, 1976, to verify measures had been established for objectives a, b, and c.
- c. Review of the following documents to verify that established measures had been implemented:
 - (1) Twelve (12) Notice of Nonconforming Material Reports dated November 3, 1977 to July 3, 1978, and

(2) Seven (7) Corrective Action Projects with completion dates of May 27, 1977 to May 16, 1978 with two (2) not completed.

Findings

Within this area of the inspection, no deviations or unresolved items were identified.

The identified customer P.O.s invoked Corractive Action.

D. Quality Assurance Records

1. Objectives

The objectives of this area of the inspection were to verify that:

- a. Sufficient records had been maintained to furnish evidence of activities affecting quality.
- b. Records included the following, at least:
 - Operating logs and results of reviews, inspections, tests, audits, monitoring of work performance, and material analyses, and
 - (2) Qualification of personnel, procedures, and equipment.
- c. Inspection and test records, as a minimum:
 - (1) Identified the inspector or data recorder,
 - (2) Type of observation, results, acceptability, and
 - (3) Action taken in connection with any deficiencies noted.
- d. Records were identifiable and retrievable.
- e. Requirements had been established concerning retention; such as, duration, location, and assigned responsibility.

Method of Accomplishment

The preceding objectives were accomplished by:

a. Review of the following Customer Purchase Orders (P.O.) to verify quality assurance records had been invoked:

- (1) Arizona Public Service Company P.O. No. 10407-13-EM-029, dated February 14, 1977.
- (2) United Engineers and Constructors PO No. 9763.006-113-1, dated May 5, 1978.
- b. Priew of the following documents to verify the QA Program addressed quality assurance record initiation and retention:
 - (1) Topical Report AWC-75-A, Revision 1, Section 17, dated November 1, 1976.
 - (2) Maintenance of QA Files, dated June 25, 1976.
- c. Review of various files in the QA Department to verify the records were in accordance with objectives a. through d.
- d. Review of the record storage area to verify records were retrievable and maintained in an environment that impeded deterioration.

3. Findings

Within this area of the inspection, no deviations or unresolved items were identified.

The identified customer POs invoked Quality Assurance Records.

E. Audits

1. Objectives

The objectives of this area of the inspection were to verify that:

- a. A comprehensive system of planned and periodic audits had been carried out to verify compliance with all aspects of the quality assurance program and to determine the effectiveness of the program.
- b. Audits had been performed in accordance with the written procedures or checklists by appropriately trained personnel not having direct responsibilities in the areas being audited.
- c. Audit results had been documented and reviewed by management having responsibility in the area audited.

 Followup action, including re-audit of deficient areas, had been taken.

2. Method of Accomplishment

The preceding objectives were accomplished by:

- a. Review of the following Customer Purchase Orders (P.O.) to verify audits had been invoked:
 - Arizona Public Service Company P.O. No. 10407-13-EM-029, dated February 14, 1977.
 - (2) United Engineers and Constructors P.O. No. 9763.006-113-1, dated May 5, 1978.
- b. Review of the following documents to verify the QA Program addressed audits:
 - (1) Topical Report AWC-75-A, Revision 1, Section 18, dated November 1, 1976.
 - (2) Inspection Manual Procedure No. 589, dated February 19, 1975, entitled Power Cable Quality Assurance System Audit and Checklist.
 - (3) Inspection Manual Procedure No. 700, dated November 10, 1976, entitled Procedure for Conducting Internal Plant Quality Audits.
- Review of completed audit checklists to verify periodic audits had been conducted and results documented.
- d. Review of Audit Report No. 5-78 and related memoranda to verify results had been documented and followup action had been taken.
- e. Review of two (2) Corrective Action Projects and related memoranda to verify followup action had been taken.

Findings

- a. <u>Deviations From Commitment</u>
 - (1) See Enclosure, Item D.
 - (2) See Enclosure, Item E.

The identified customer P.O.s invoked Audits.

b. Unresolved Items

None.

F. Exit Interview

- The inspector met with management representatives denoted in paragraph A. at the conclusion of the inspection on December 14, 1978.
- The following subjects were discussed:
 - a. Areas inspected.
 - b. Deviations identified.
 - c. Contractor response to the report.

Management was requested to structure their response under headings of corrective actions, preventive measures, and dates for each deviation.

 Management representatives acknowledged the comments of the inspector.