

Babcock & Wilcox

Commercial Nuclear Fuel Plant

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June 13, 1980

Mr. Uldis Potapovs
Vendor Inspection Branch
United States Regulatory Commission, Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76012

Dear Sir:

In response to your letter of May 13, 1980 concerning apparent deviations from Criterion V of Appendix B to 10 CFR 50, we submit the attached replies to the audit report inspection summary.

Very truly yours,

BABCOCK & WILCOX
NUCLEAR MATERIALS & MANUFACTURING DIV.

C. J. Baroch
General Manager

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DEVIATION

Qualification report, Qualification of Burnable Poison Rod Lower End Plug Weld and Verification of Burnable Poison Rod Upper End Plug Weld, ME-008, requires that the parameters specified in the qualification be used to control the fabrication process.

Contrary to the above, the amperage limits, a parameter specified in the qualification were not included in the fabrication process procedure. In addition the voltage limits, another parameter specified in both the qualification and the procedure were exceeded.

ACTION TAKEN

An immediate review of the process in operation, procedure and qualification report was performed and it was confirmed that the weld quality was not abridged by the above finding. The operator in accordance with the procedure was using the dial settings on the automatic welding system that were qualified as reported in ME-008. The weld current was within the indicated range in the qualification and the deviation of the voltage was minor.

Additionally, a new qualification is being planned in order to expand the allowable range of welding parameters to eliminate the potential for deviations due to minor shifts in the system. The new qualification and process procedure will be structured such that the primary control of the welding process will be via the dial settings of the calibrated automatic welding machine. As a secondary confirmation, the operator will be instructed to periodically observe machine output through use of appropriate recorders. The new qualification will be complete by July 31, 1980.

PREVENTATIVE ACTION

The cognizant engineers are being instructed via a written memo to review similar welding processes to confirm that the procedures are in accord with the conditions of the applicable qualification. In those cases where an inconsistency exists, appropriate action will be taken.

DATE OF CORRECTIVE ACTION

The revised qualification and memo initiating the general review will be complete by July 31, 1980.

DEVIATION

The Quality Assurance Manual, Revision 10, Section 15, part 2.1.2 states; "Non-Conforming components shall be separated from conforming components and identified (tagged, marked) as being non-conforming."

ACTION TAKEN

All deviated fuel rods in the tray were identified (tagged) as to their non conforming condition. This tagging operation was completed on May 2, 1980.

PREVENTATIVE ACTION

Since fuel rods are unit traceable by means of the serial number on the lower end cap, we intend to maintain direct control of non conforming fuel rods by means of a log book. This log will list the rod by its number and the nature of the non conformance. The log book and the non conforming rods will be retained in a channel under lock and key and accessible to QC personnel only.

We shall revise our Procedure QC 822 "Tagging Components, Parts and Assemblies" to define this method of control of non conforming fuel rods.

DATE OF COMPLETION

The corrective action described above will be completed by July 15, 1980.

DEVIATION

Procedure, Fuel Pellet Sample Selection, QC-929, Revision 3, paragraph 4.2.3 states in part; "Identify each fuel pellet box with a QC Sampled stamp as the pellet samples are pulled for the master sample."

Contrary to the above, an inspection of the sampling of lot 6 on project 67E found ten (10) boxes that were stamped but not sampled.

ACTION TAKEN

The ten (10) boxes, from which samples had not been withdrawn, were sampled on the same day that we became aware of the deviation (April 30, 1980). These additional samples were added to the master sample for lot 6 of NSC-067E and used in assessment of lot quality.

PREVENTIVE ACTION

The inspectors involved in the pellet sampling have been reinstructed that the stamp "QC Sampled" shall be applied to a fuel pellet box only after the proper samples have been selected from that box. They were further advised that there were to be no exceptions to these instruction.

DATE OF COMPLETION

These instructions were discussed with the inspectors on April 30, 1980.