

GENERAL  ELECTRIC

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NUCLEAR ENERGY
PRODUCTS DIVISION

WILMINGTON MANUFACTURING
DEPARTMENT

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2 April 1980

United States Nuclear Regulatory Commission
Office of Inspection and Enforcement - Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76012

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

Dear Sir:

This letter is in response to Inspection Report No. 99900003/80-01 as documented in your letter of March 6, 1980.

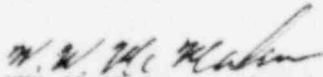
General Electric, Wilmington Manufacturing Department, submits the attached responses to the findings identified by Mr. WM McNeill of your office.

We have reviewed the report issued under your letter of March 6, 1980 and found nothing considered proprietary about the information provided therein.

It is requested that you notify your inspector that he will be informed, during our next regular inspection, of recent organizational changes made within General Electric's Nuclear Products Division.

Should you or your staff have any questions regarding this letter, we will be glad to discuss them with you.

Sincerely,


WW McMahon, Acting General Manager
Wilmington Manufacturing Department

nbk

Attachments

DEVIATION A.

1. Procedure P/P 70-17, section 5.3, states in part:

Procedure P/P 70-17, requires repair planning to be prepared by manufacturing operations and process control engineering for inspection operations. Process control engineering is also to review this planning for completeness and adequacy.

Contrary to the above, the planning documented on Inspection Report (RV690) issued for repair of Control Rod Guide Tube, SN 7012, was inadequate in that it did not include operations 040, final cleaning and 045, post cleaning inspection after the repair.

RESPONSE TO DEVIATION A. 1.

To correct this deviation, Process Control Engineering immediately issued Inspection Report #RX125 requiring the subject Control Rod Guide Tube to be processed through cleaning, inspection and preparation for shipment. The PCE inadvertently neglected to stipulate these requirements when dispositioning the original IR.

To prevent recurrence, all Equipment Process Control Engineers (EPCEs) were initially counseled on Inspection Report activity by management at the EPCE staff meeting of February 20, 1980. The engineers were reminded to assure that dispositions on IRs were properly completed. This subject will be emphasized at each staff meeting this year.

A copy of the minutes from the February 20, 1980 meeting are available in the QA&CS office for review.

DEVIATION A.

2. Procedure P/P 79-5, section 5.2.1, in regard to dispositions of Inspection Reports states in part:

"Accept As Is - Meets Specifications - The Quality Assurance representative has the authority to make this disposition. However, he must document his justification on the IR or attachments to the IR."

Contrary to the above, a lot of Hydraulic Control Lines, 532JA, was found on Inspection Report, (IR) R2840, which had 4 of the 15 parts dispositioned "accept as is," however, the justification was not documented on the Inspection Report.

RESPONSE TO DEVIATION A. 2.

The responsible Level III Nondestructive Inspector who modified subject IR, along with all EPC Engineers, was reminded of the IR disposition requirements in P/P 79-5 during the February 20, 1980 meeting. A copy of this communique is available for review.

DEVIATION A.

3. Procedure P/P 70-4, section 5.3.2.3, states in part:

"NCM being processed on rework/repair planning must be identified with a NCM tag, the IR number on the traveler, part 6 of the IR and the applicable rework/repair planning."

Contrary to the above, a fuel support, S/N 1334 was identified as nonconforming material (NCM) on Inspection Report (IR) RW004, but had not been tagged with an NCM tag.

RESPONSE TO DEVIATION A. 3.

Subject fuel support, S/N 1334, was immediately tagged with an NCM tag by a QC Inspector. A subsequent investigation could not establish if the part had been previously tagged but the tag had fallen off during movement of the skid. However, to motivate all shop and inspection personnel to be more quality conscious, a Quality Newsletter will be issued periodically with the intention of conveying to all shop personnel current quality problems and recurring discrepancies. The newsletter will be discussed at each roundtable meeting.

Contained in the first issue of the newsletter is a section addressing correct control of nonconforming inventory and highlighting the deviations from the January NRC inspection. Hopefully, this approach will minimize recurring nonconforming material control discrepancies.

DEVIATION A.

4. Procedure P/P 70-4, section 2.3, states in part:

"Identification of nonconforming material awaiting dispositions will be by use of manual status logs, computer systems, unique material type identify, NCM tag (or label) or by MARSH AEC marking pen."

Contrary to the above, a lot of velocity limiters, 398MO, was found which had one part which had been rejected at first piece inspection but not identified with a tag, marking pen, etc. It was established that it was not the common practice to tag or otherwise identify parts which failed first piece inspection. (See Details Section I, paragraph B.5).

RESPONSE TO DEVIATION A. 4.

Quality Verification has revised QIS 101 to require inspectors to tag first piece rejections with an NCM tag immediately upon detection.

DEVIATION B.

Procedure P/P 80-21, sections 5.12 and 5.13, states in part:

"EM operator will process the material, enter his pay number, ... quantity completed during his shift on the Shop Traveler or Mini-Traveler. On completion of each operation, the operator will check for the total quantity completed...."

"The QV&R Inspector will, upon satisfactory completion of an inspection operation, enter the quantity inspected...."

Contrary to the above, although the shop travelers were signed off indicating the above requirements to be satisfied, a lot of Guide Caps, 019K, was found on the shop floor which had 44 pieces noted on the traveler by the operators and inspectors but the lot contained 46 pieces (See Details Section I, paragraph C.3.c).

RESPONSE TO DEVIATION B.

When the incident was detected, the lot of Guide Caps was immediately placed on IR RX173. Subsequent investigation revealed that all 46 parts were from the same heat number. All lots released between 9/20/79 and 1/30/80 were from heat #M2408B. Since lot #019K was released on 11/28/79, a mixture of heat numbers within the lot was not possible. Consequently, the IR disposition required the shop to correct the traveler quantity to reflect 46 parts rather than 44.

The Quality Newsletter (discussed in response A.3.) will be the vehicle used as a continuous reminder to all shop personnel of the importance of maintaining account of all production parts.

DEVIATION C.

Procedure P/P 70-23, section 5.5.3, requires all instruments or controls to have a "Calibration," "Not for Product Acceptance," or "Standardized Per _____" sticker placed on them.

Contrary to the above, the amperage and voltage instruments on the "pigme" welders and the water rod tab welder were not labeled (See Details Section I, paragraph D.3.c).

RESPONSE TO DEVIATION C.

The amperage and voltage instruments on the "pigme" welders and the water rod tab welder were labeled with "Not for Product Acceptance" stickers after the incident was reported. In addition, all other instruments in the FCO facility were reviewed for the appropriate calibration sticker. The NPA sticker applies to measurement and test equipment which is not essential and which is used only as a shop aid as determined by Quality Control Engineering. The Instrument Calibration Technician for FCO is continually monitoring the facility for correct calibration sticker placement.