

Industriestraat 10  
P.O. Box 12, 7550 AA Hengelo, The Netherlands  
Telephone 05400 - 1 79 61  
Telex 4 40 85  
Telegrams: Dijkers Hengelo  
Register at Hengelo Nr. 37150  
Bankers: Algemene Bank Nederland  
Hengelo 59 06 47 965  
Amro Bank Hengelo 47 46 17 491

**DIKKERS**

Attn. Mr R.V. Seyfrit

United States Nuclear Regulatory Commission  
Region IV  
6 M Ryan Plaza Drive  
Suite 1000  
Arlington  
Texas 76012 / U.S.A.

Your ref.

Our ref. RJH/AZ/65

Date January 18, 1980

Dear Sir,

Thank you for the letter - Docket No. 99900361/79-02 -  
giving details of the Q.A. Program Inspection conducted  
by Messrs Potapovs and Barnes on October 29 - November 2, 1979.

In giving responses to the various findings made during the  
inspection I will maintain the order given in the Notice of  
Deviation attached to the above letter.

FINDING A

Since our client has accepted the document package submitted it  
is our opinion that the requirements of the Design Specification  
have been met to his satisfaction.

The Quality Assurance Plans submitted by Dijkers were intended to  
cover the requirements of 10 CFR 50 Appendix B at sub-vendors and  
our own facility.

Air cylinders provided by Sempress B.V. and Solenoid supplied by  
Siatz A.G. have been subjected to source inspection and receipt  
inspection.

Further, all Safety-Relief Valves have been subjected to full-flow  
steam tests to prove function and no failures of air-cylinders or  
solenoids have been recorded.

Dijkers will, further, attempt to obtain written, statements from  
both vendors to the effect that the relevant Q.A. Plans have been  
adhered to and all purchase order requirements have been met. This  
action to be completed for 800229.

Further, the Q.A. Manual will be altered to state that Vendors of  
Safety-related items must be added to the Nuclear Vendors List and  
that safety-related items beyond ASME code items must be clearly  
stated by the client prior to acceptance of the order. This action  
to be completed 800331.

8005210405

FINDING B

The internal audit procedure has now been implemented as discussed during the NRC Q.A. Program Inspection.

A start was made in November 1979. However, no audits were carried out in weeks 51/79, 52/79, 01/80 or 02/80 because of Management Audits scheduled for this period and our prolonged Christmas Break.

FINDING C

We are unable to determine the exact nature of this finding. We have investigate the project under consideration and are of the opinion that this finding can only be relevant to Smitweld Conarc 49C weld material (ASME II S.F.A. 5. 1 material). However, the specifications are in our opinion acceptable both material spec. (EAM 2951626017 Rev. 2) and all WPS's reference a preheat temperature of 100-150°C and an interpass temperature of 100-260°C.

Page 6 Section C in the "Details Section" of your report refers to a welding operation on a seat. This does not require use of a ASME II SFA 5.1. electrode but an ASME II SFA 5.4 electrode. Here the preheat temperature and interpass temperatures should be in accordance with SFA 5.4 and additional requirements of NB 2431.1 (c) are not applicable and therefore your comment cannot refer to this operation.

Please give further clarification.

The steps taken to prevent recurrence of this type of problem remain as indicated in our letter dated 790618 in response to the NRC audit carried out in May 1979.

FINDING D

NCR No. 48095 has now been endorsed with a reference to the associated repair traveller. This repair traveller has been signed-off by the ANI, thus indicating that the NCR and recorded defect were presented to the ANI for review.

To prevent recurrence of such non-conformances the Q.A. Engineers involved with N-Stamp work have been re-instructed to obtain the ANI signature on NCR's. Further, the use and completion of NCR's to be audited on a monthly basis (see comments on finding B).

FINDING E

- (a) The identification of weld material used on bodies of heat numbers 05.23.8-4 and 19.34.8-8 and bonnet of heat numbers 22.35.8-1 was obtainable from the relevant repair reports. This information has now been added to travellers.

This is a historical problem discussed and resolved internally some months ago and current route cards are correctly complete. No further action intended.

- (b) The current practice within Dikkers is to produce NDE reports after manufacture of parts. The NDE reports are produced by Q.A. Engineers using information taken from travellers.

It is intended that new NDE Reports will be designed and these will be produced during manufacture of parts. This procedure will then agree with manual descriptions.

The target date for implementation is 800331.

- (c) (i) Shop order Travellers are to be revised such that the last operation will be "transport to store" and the previous operation will be "Audit by Q.A. Engineer".  
The target date for implementation on new Route Cards is 800331.
- (ii) The P.T. inspection of this part was completed 791101 and was witnessed by the Authorised Inspector. See (c)(i) for information on long-term preventative measures.
- (iii) Operations R6F is signed on the front of the card but not dated. Operation R10K is not signed-off but the repair report is available and completed. Operation 11L is signed-off and dated on the front of the card by the Authorised Inspector and on the reverse side by Dikkers Inspector.  
The manual will be altered to make sign-off requirements on route card more explicit and preventative measures as indicated in (c)(i) will be taken.
- (d) This witness point has now been discussed with our previous ANI and the waiver is documented.  
The necessary waiver documentation will be made available to Dikkers 800208 in a special visit arranged for this purpose. Preventative measures will be taken as indicated in (c)(i).
- (e) The visual inspection was carried out at the same time as the MT operation following and one signature was used to cover both operations. The Chief Inspector has been informed of the need to sign-off both activities in the future. Other Preventative measures to be taken are as indicated in (c)(i).

#### FINDING F

Both non-conformances noted have been corrected.

Sketches showing the orientation and location for removal of Charpy V impact test specimens for Heat Code AJW 65 are now available. These have been produced by Dikkers on the basis of written information given in the original CMTR. Charpy Impact test specimens were removed from a seat of heat code AJW 129 and these specimens were tested as required in the material specification. The values obtained were found to be acceptable.

To prevent recurrence the Q.A. Engineer has been instructed of the requirements of the ASME Code. Further, this point has been included in the Audit Programme.

FINDING G

Sempress B.V. are not now and were not at the time of audit on the Nuclear Vendors List and will not be re-instated until they have undergone a successful re-audit.

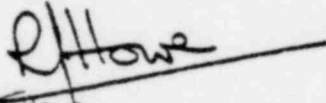
In order to prevent recurrence of such non-conformances two steps are to be taken.

- (a) A Q.A. Engineer will be given sole responsibility for control of the Q.A. Systems, including internal and external auditing.
- (b) A closed loop "Corrective Action" system has been devised. This will be under the control of the above Q.A. Engineer.

The Q.A. Systems Engineer is to be recruited and it is hoped that this position can be filled by 800331.  
The closed loop "Corrective Action" system is now available and in use.

I sincerely hope this information is acceptable and sufficient for you to complete your activities.

Yours faithfully,

  
R. J. Howe