



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

MAY 02 1980

Mr. Al Breed, Manager  
Quality Assurance Section  
General Electric Company  
175 Curtner Avenue  
San Jose, CA 95125

Dear Mr. Breed:

SUBJECT: PROPOSED CHANGE (CONTROL OF NONCONFORMANCES) TO GE TOPICAL REPORT  
NEDO-11209-04A

The QAB has evaluated General Electric's proposed alternative (reference Breed/Conway facsimile dated March 11, 1980) to the reporting requirements for non-conformances under Section 8.2, paragraph 6 of ANSI N45.2.13-1976. The proposed change does not satisfy our requirements.

It is a staff position that all nonconformances to an owner's procurement document requirements, including referenced or incorporated drawings and specifications, dispositioned "use-as-is" or "repair" for items and services which are important to safety shall be reported to the owner (purchaser). This information must be provided to the owner (purchaser) to enable him to determine the acceptability of the procured item or service and its subsequent effect on the safe operation of the facility.

Our position is predicated upon the need for the owner (purchaser) to identify in the procurement document the requirements that must be met by the supplier to assure safe operation of the facility consistent with regulatory requirements. Section 15.2 of NEDO-11209-04A should be revised to reflect this position or an acceptable alternative should be described. If you have any questions on this matter, please contact John Gilray on (301) 492-7741.

Sincerely,

A handwritten signature in cursive script that reads "Walter P. Haass".

Walter P. Haass, Chief  
Quality Assurance Branch  
Division of Engineering

8005220476