

NATIONAL VALVE AND MANUFACTURING COMPANY



158 - 49TH STREET
PHONE: (412) 683-8023
TWX 710-664-2024

BASIC ENGINEERS DIVISION

PITTSBURGH, PA. 15201



NEW YORK - CHICAGO - KANSAS CITY
BOSTON - ATLANTA - LOS ANGELES
PHILADELPHIA - CINCINNATI - TULSA
DENVER - HOUSTON - SAN FRANCISCO

April 25, 1980

U.S. Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76012

Attn: Mr. Uldis Potapovis, Chief, Vendor Inspection Branch

Ref: Reply to VIB Inspection
Notice of Violation & Deviation dated 3-28-80
Inspection Report No. 99900710/80-01

Gentlemen:

Following is our reply to the Notice of Violation and Notice of Deviation in your Docket No. 99900710/80-01:

1. Notice of Violation - Failure to post Section 206 of the Energy Reorganization Act and Procedures in accordance with Section 21.6 of 10 CFR part 21.

Comment - Section 206 and an accompanying notice was posted on January 5, 1978 as required. This notice was inadvertently removed from the bulletin board around January, 1980 during a clean up of obsolete notices.

Disposition - This notice was again posted by April 1, 1980.

Corrective Action to Prevent Recurrence - The present notice has been marked in red "DO NOT REMOVE", and management personnel have been directed to see that it is not removed. An I & T Session was held on 3-13-80.

2. Deviations

A. A welder was welding in the 2F position and was only qualified to weld in the 1G and 1F positions.

Comment - The 2F position welds in question were tacks used to align the joint. The welder was verbally instructed, at the time of the finding, by the QA Manager, to complete the weld in the 1G position and to remove the tack welds by grinding as he progressed with welding. This is documented on NCN J-731.

Disposition - Accept as is based on documented NCN J-731.

8006090148

U.S. Regulatory Commission
Reply to VIB Inspection
Inspection No. 99900710/80-01

2. Deviations

A. (Continued)

Corrective Action to Prevent Recurrence - An I & T Session was held on 3-13-80 with the QC Inspectors and the welders to explain the various positions and qualifications. In addition, a procedure for Qualification of Component Support Welders is being prepared and shall be implemented by 5-15-80.

B. Welder was using brass backing on a repair weld. The joint design was not shown on the WPS 1-Hd-1.

Comment - 1. The brass backing was used as temporary backing for the root of the weld. After the backing was removed, approximately 1/8" of weld metal was removed from the back side by grinding. The back side was then welded out flush using the previously deposited weld metal as backing.

2. This repair weld was to plug a tolerance fit hole in a pipe clamp. After welding, the hole is to be re-drilled and reamed to the proper tolerance.

Therefore, the entire root will be removed and a small amount of weld metal will be left around the inside of the hole.

3. A test piece was welded by the same welder using the same procedure. This piece was then sectioned and chemically etched. The etched section shows complete penetration and no signs of contamination from the brass backing.

Disposition - Accept these 4 clamps as is for their particular application. NCN J-677 was generated.

Corrective Action to Prevent Recurrence - 1. These particular welds are not primary load carrying welds and are not located in a highly stressed part of the clamp. However, we agree that there is the potential of contamination and/or reduced strength on other welds which are more critical. The brass backing plates have been removed from the shop. I & T Sessions were held with the QC Inspectors and welders on 3-13-80 and brass backing is not permitted on any weld, backing shall be compatible with the base material.

2. A repair procedure is being written to describe the joint geometry, backing, weld procedure(s) and inspection requirements. Date of scheduled implementation - 6-1-80.

C. Contrary to Par. 6.3.3 of QA Manual, the QC Inspector did not certify conformance to the welding procedure by initialing and dating the proper space on the QC Data Sheet and the assembly drawing.

Disposition - NCN J-656 was written on 3-11-80 to cover this finding. Although the QC Inspector did in fact witness the welding he did not verify this on the correct QC Data Sheet. This was corrected by the QC Inspector on 3-20-80.

Corrective Action to Prevent Recurrence - Starting on 3-14-80, we have modified the flow of sheets from keeping the QC copy of a Production Package in the QC Office to having it at the work area so that the QC Inspector is not running back and forth for copies of the sheets on which he documents. An I & T Session was held on 3-13-80 by the QC Manager with all QC personnel and the above change was made.

BASIC ENGINEERS DIVISION

Page 3

U.S. Regulatory Commission
Reply to VIB Inspection
Inspection No. 99900710/80-01

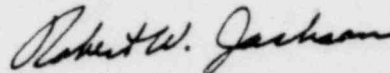
2. Deviations - (CONTINUED)

D. The QC Inspector did not record the NCN number on the QC Data Sheet or Assembly Drawing.

Disposition - The correct identification of this support is S.O. 2341, Pkg. - DG-3, MK. No. - 40095 - NCN J-647. The NCN number has been recorded on QC's copy of the QC Data Sheet.

Corrective Action to Prevent Recurrence - The QC Manager held an I & T Session on 3-13-80 with the QC Inspectors and re-emphasized that NCN numbers must be recorded on the QC Data Sheet or Assembly Drawing.

Very truly yours,



Robert W. Jackson
Quality Assurance Manager

RWJ/jah

cc: W. Biddle
J. Buczkowski
G. Claus
H. Holcomb
L. Stone
P. Scholar
R. Lamm
R. Lobb
H. Stone
QA File