

The Foxboro Company

Foxboro, MA 02035 U.S.A.
(617) 543-8750

9 May 1980

United States
Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76012

Attention: Mr. Uldis Potapovs, Chief
Vendor Inspection Branch

Reference: Docket No. 99900225/80-01
QA Program Inspection of The Foxboro Company
Highland Plant, East Bridgewater, MA

Gentlemen:

Thank you for your letter with regard to the recent QA Program Inspection conducted by your Mr. W.E. Foster on March 17-21, 1980.


We have carefully reviewed the Notice Of Deviation and have taken the necessary measures to correct the deviations as described in the attached response. In each case we have described the steps that have been, or will be, taken to correct these items, the elements which would prevent recurrence, and the dates that all actions will be completed.

We trust you will find the response satisfactory; however, if questions arise Mr. Forest H. Leathers, or myself, will be available to respond.

Finally, we appreciate the extension in time to respond. The information was on hand as prepared by the Highland Plant; however, we had several questions to be resolved before finalizing the material. The extension gave us the opportunity to do this and we, in the Corporate QA Function, are satisfied that all deviations have been satisfactorily addressed.

Very truly yours,

THE FOXBORO COMPANY


William Calder, Manager
Corporate Quality Assurance

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Attachment

cc: Messrs. Graham, Leathers, Golemme, DeLuca

FOXBORO

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Nuclear Regulatory Commission
Docket #99900225/80-1
The Foxboro Company
Highland Plant, East Bridgewater, MA
Audit Date: March 17-21, 1980

Response to: "Notice of Deviations"

A.1 Contrary to our corrective action response letter, dated October 14, 1977; Workmanship Standard 14200AH has not been revised to require one and one-half thread protrusion for all nuts and bolts regardless of use or configuration.

- (a) Workmanship Standard 14200AH paragraph 5.2 does, in fact, require the minimum one and one-half thread protrusion.
- (b) As a result of your finding, during an audit of this facility, July 12-14, 1977 a review of this standard was initiated relative to the application of this requirement.
- (c) Prior to the completion of this review, our response letter dated October 14, 1977 was released stating that Standard 14200AH would be followed for all nuts, bolts regardless of use or configuration.
- (d) Upon completion of this review by our standards committee with our Product Engineering group, we found it necessary to revise our position and to take exception to the requirement as stated in 14200AH Paragraph 5.2.
- (e) This paragraph was revised and approved 12/13/77 to include the following statement: "Screw extends past nut or retainer a minimum of 1½ threads, except when such projection interferes with the design function."
- (f) Highland Plant Procedure #54.72 was initiated on 3/17/78 specifically for reporting of this hardware type consideration.

We believe with this clarification and correction of previously misstated actions this finding may be closed as all procedures have been completed.

A.2 A minimum of 4 audits had not been performed in 1978 for Dept. 704 to ensure that inspectors were doing a proper inspection job.

- (a) Procedure #54.48 "Highland Plant Mini Audit", was revised on 8/30/78 and states in part: "It is intended that all areas be audited twice annually."
- (b) Dept. 704 was audited in 1978 during the weeks of 3, 15, and 29. The fourth quarterly audit was omitted as a result of the procedure requirement change.

- (c) Audit Reports #4, 39, and 73 covering these audits are on file and are available for review.

We believe with the above clarification, required as a result of procedural changes, this finding may be closed as all actions are complete and implemented.

- B. No maintenance log or procedure evident on the Sequencer.
 - (a) The log and procedure had been removed by Manufacturing Engineering as a step in implementing a computerized maintenance control system.
 - (b) A due date sticker has been applied (in lieu of manual logging) to the sequencer; and the device is now under computerized control.
 - (c) A Hold will be placed on all Highland Plant processing tools and equipment pending the assignment of maintenance due date stickers.
 - (d) Periodic, scheduled audits to this requirement are now added to the auditors' worksheet and are to be a part of all audits.

Corrective actions have been completed on this finding and the computerized system of maintenance recall should prevent recurrence.

- C. No maintenance procedure folder was evident on the automatic inserter.
 - (a) Manufacturing Engineering had removed the procedure from the machine.
 - (b) A maintenance due date sticker has been applied to the machine.
 - (c) The maintenance folder has been returned from Manufacturing Engineering.
 - (d) A hold will be placed on all Highland Plant process tools and equipment which do not have a due date sticker attached.
 - (e) Periodic audits are scheduled to confirm this requirement's implementation.

We believe the actions taken to be adequate to prevent recurrence.

- D. Stamping of Route Cards per #52.2L and QCII 24100LQ:
 - (a) The use of the "OK for Stock" stamp, at final inspection, was used as interchangeable with the "circle" QC stamp for acceptance.
 - (b) QCII 24100LQ was not clear as to the use of each stamp.
 - (c) QCII 24100LQ is revised as follows.

Sequence 5B: "Before stocking 'OK for Stock' stamp goes on the lower portion of main card--not on tear-off section." It is not necessary to "circle" stamp, a final inspection operation if the "OK for Stock" stamp is to be used.

We believe this clarification of this procedure will prevent recurrence of the finding as noted.

E.1 Wave solder machine settings differ from the requirements contained in Procedure No. 14100YB, Revision B dated March 27, 1979.

- (a) The machine settings are correct as found, the procedure had not been updated to reflect the new parameters.
- (b) The Procedure No. 14100YB is revised to Revision C dated 4/2/80 to reflect the correct values and settings as required by the process.
- (c) The torn sticker was the result of loosening due to the heat of the machine.
- (d) The QC calibration department is investigating and will provide a means to avoid this condition. The resolution should be completed by 5/30/80.

Actions taken should prevent recurrence of the findings as noted.

E.2 Test of boards for cleanliness not performed on a weekly basis as required.

- (a) Test was omitted as a result of favorable results over a prolonged period.
- (b) Tests have, however, been reinstated and will be performed by the QC Laboratory.
- (c) This requirement has been added to the audit worksheets for Areas D710/784.

We believe the actions taken will prevent recurrence of these findings as noted.