

GENERAL  ELECTRIC

WIRE AND CABLE

BUSINESS

DEPARTMENT

GENERAL ELECTRIC COMPANY 1285 BOSTON AVENUE
BRIDGEPORT, CONNECTICUT 06602, Phone (203) 334-1012

June 20, 1980

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

Attn: Mr. W. E. Foster
Contract Inspector

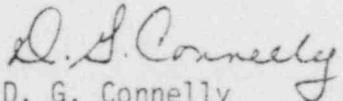
Ref: Docket No. 99900398/80-01

SUBJECT: Responses to Deviations

Dear Mr. Foster:

Attached are the responses to the deviations noted in the summary of your inspection of May 5-9, 1980. The responses have been formatted as you requested. Should you have any questions concerning the responses we will be pleased to discuss them with you.

Sincerely yours,


D. G. Connelly
Manager-Quality Control
Bridgeport Cable Plant

DGC/rb

8007250587

General Electric Company
Wire and Cable Department
1285 Boston Avenue
Bridgeport, CT 06602

Docket No. 99900398/80-01
Program No. 51400
Inspection Conducted: May 5-9, 1980

RESPONSE TO DEVIATION

A-1 DEVIATION: Reference Section 1.4, Issue A, dated 3/7/66 PDEM, Paragraph 1.1.

The following Custom Order Product Design Specifications (CO PDS's) for Bechtel/Southern California reflected Bridgeport Manufacturing Instruction (BMI) No. 13, Section 7-0; Nos.: CO 10400, Issue A dated April 28, 1980; CO 10405, Issue A, dated May 1, 1980; and CO 10413, Issue A, dated May 1, 1980.

CORRECTIVE ACTION:

Issuance of ECA to revise Section 1.4, Issue A, PDEM, Paragraph 1.1 to agree with current practice will delete, "Reference to Manufacturing-Processing instructions such as BMI's and Factory Standardization Manual shall not appear on any Product Design Specification."

EFFECTIVE DATE:

ECA to be issued no later than 6/30/80.

PREVENTIVE MEASURES:

Revision of PDEM concerning reference to Manufacturing Processing Instructions such as BMI's reflects current practice and will preclude repeat of this deviation.

EFFECTIVE DATE:

Same as issuance date of ECA, no later than 6/30/80.

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RESPONSE TO DEVIATION

A-2 DEVIATION: Reference Section 1.4, Issue A, dated 3/7/66, PDEM, Paragraph 1.3.3.

A Product Design File had not been initiated/maintained by the engineers, as evidenced by a lack of cards and file of the previously identified CO PDS's.

CORRECTIVE ACTION:

- Section 1.4, Issue A, PDEM, Paragraph 1.3.3 which now reads, "There is no published index covering CO PDS's, but a Product Design File has been initiated as outlined in Manual Section 1.5 to assist in the retrieval of design information on special designs. In addition, a product file is maintained by Production Control Edit Specialist to assist in this area and this source should be checked as necessary to locate previously designed specials. All CO PDS's shall be recored in the Product Design File in accordance with Manual Section 1.5 concurrent with the release of the CO by the engineer." will be changed by ECA to reflect current practice and will read, "A card file of CO PDS's is to be prepared and maintained by the Production Control Edit Specialist to assist in locating previously designed specials."
- Reference to Section 1.5, Issue A, PDEM requiring that the engineer issue and file a card for every Custom Order (CO) has been eliminated from current day practice and will be deleted from the PDEM via ECA.

EFFECTIVE DATE:

ECA's for both sections to be issued no later than 6/30/80.

PREVENTIVE MEASURES:

The product design card file is no longer initiated by engineering but is maintained by Production Control. The PDEM will be modified to reflect current practice.

EFFECTIVE DATE:

Same as issuance date of ECA's, no later than 6/30/80.

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RESPONSE TO DEVIATION

A-3 DEVIATION: Reference Section 1.4, Issue A, dated 3/7/66 PDEM, Paragraph 2.11.6.1.

Customer/industry specifications had not been repeated under the heading of Final Test and Inspection of the following CO PDS's for the Bechtel/Southern California order; Nos.: CO 10400, Issue A, dated April 28, 1980; and CO 10412, Issue A, dated May 1, 1980. The inspector noted that the PDS's contained no heading identified as, Final Test and Inspection.

CORRECTIVE ACTION:

Section 1.4, Issue A, dated 3/7/66 PDEM, Paragraph 2.11.6.1 which now reads, "The PDS shall include tests required by customer and/or industry specification during manufacture, tests required only by Manufacturing for quality assurance and/or to insure meeting later requirements and these shall be considered process control tests and labeled (PC) and final tests required by customer and/or industry standards and any other special tests required by Engineering for information or other purposes as indicated. The applicable customer and/or industry specification references included in the title of the PDS shall be repeated under the Final Test and Inspection heading." will be changed by ECA to reflect current practice and will read, "The PDS shall include tests required by customer and/or industry specification during manufacture, and optional tests required only by Manufacturing for quality assurance. The applicable customer and/or industry specification references included in the title of the PDS shall be repeated in the section of the PDS relating to pre-shipment testing if certified test reports or certificates are required."

EFFECTIVE DATE:

ECA to be issued no later than 6/30/80.

PREVENTIVE MEASURES:

The use of terminology such as Final Test and Inspection is not currently being used and has been dropped by R&SE design engineers. Details of required test requirements are being described in the portion of the PDS relating to pre-shipment testing. Issuance of the ECA to reflect this fact brings our procedures in agreement with current practice.

EFFECTIVE DATE:

Same as issuance date of ECA, no later than 6/30/80.

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RESPONSE TO DEVIATION

B. DEVIATION:

".... parameters not maintained during tin plating of wire"

The parameters had not been maintained during tin plating of wire, as evidenced by: AMP/WIRE - 400 for Wire No. 2; 400 for Wire No. 3; 420 - 440 for Wire No. 4; 360 - 380 for Wire No. 5; and 360 - 380 for Wire No. 6; Tank AMP's - 650 for South; and 1200 for North; Wire Speed - 260.

These conditions were noted on Line No. 3; it was also noted that five wires were running with position No. 1 vacant.

CORRECTIVE ACTION:

- 1) Immediate corrective action. The machine operator was disciplined for failure to follow instructions within the limits of the existing union contract.
- 2) No corrective action was necessary on the product as the specification for tin coated copper conductor only specifies a minimum thickness value. The net result of the higher than specified currents and the lower than specified speeds was to add more than the minimum specified tin thickness.

EFFECTIVE DATE:

Complete.

PREVENTIVE MEASURES:

- 1) Conduct training sessions as required with the machine operators on all three shifts to insure the instructions are followed.
- 2) Quality Control inspectors will audit the equipment for conformance to instructions.

EFFECTIVE DATE:

1) 10/1/80 - 2) 7/1/80

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RESPONSE TO DEVIATION

C. DEVIATION: Reference Section 1.9, Issue A, dated 10/19/64 PDEM, Paragraph 2.1.

Contrary to the above, Engineering Change Authorizations (ECA's) had not been used to record changes made in Sections 1.8 and 7.1 of the Product Design Engineering Manual on May 11, 1970 and April 30, 1975 respectively.

CORRECTIVE ACTION:

- To assure control of revision to the PDEM a revision block will be added to PDEM pages as they are changed. This revision block will include ECA number, date, engineer's initials and manager's initials indicating approval.
- An ECA will be issued to revise Section 1.9, Issue A, PDEM, Paragraph 2.3 changing "technical clerk's responsibility" to "manager's responsibility". This ECA will describe procedures that the Manager of R&SE will follow during the processing of ECA's for the PDEM.

EFFECTIVE DATE:

ECA to be issued no later than 6/30/80.

PREVENTIVE MEASURES:

Addition of the revision block to each PDEM page to be changed, and approval shown by placement of the R&SE Manager's initials in this block, will preclude repeat of this deviation.

EFFECTIVE DATE:

Same as issuance date of ECA, no later than 6/30/80.