

TUBECO INC.



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BROOKLYN, N.Y. 11237
PIPE FABRICATING
TEL - (212) 386-0700
ITT TELEX NO. 425529
WU TELEX NO. 12-9203

May 8, 1980

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

Attention: Mr. Karl V. Seyfrit, Director

Subject: Docket No. 99900216, Inspection of March 24-28, 1980

Gentlemen:

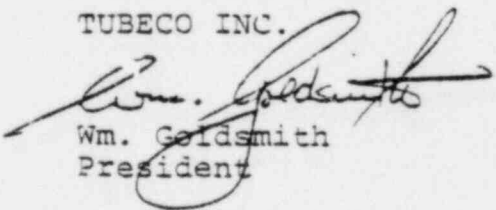
I have reviewed the notices of deviations as reported in the attachments to your letter of April 14, 1980 and have directed actions to be taken in accordance with the attached detailed responses.

In order to further improve the attitude of the shop personnel to the Quality Assurance requirements, I have directed the institution of formal training for welders, fitters and foremen.

I appreciate the cooperation given us by the Commission and assure you that we will take all measures necessary to achieve the standard of quality required.

Very truly yours

TUBECO INC.


Wm. Goldsmith
President

WG/jl

enc: Detailed response.



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DEVIATION NOTICE A

1. A WELDER WAS OBSERVED USING A RING OF MATERIAL, WHICH WAS TACK WELDED TO A PIPE, FOR A GROUND CONNECTION, WHICH WAS NOT IDENTIFIED BY MARKING, COLOR CODING OR OTHER SUITABLE MEANS.

CORRECTIVE ACTION:

A.1 THE AREA OF ATTACHMENT WAS GROUND TO A DEPTH SUFFICIENT TO REMOVE POSSIBLE CONTAMINATION AND EXAMINED BY LIQUID PENETRANT.

ACTION COMPLETED.

ACTIONS TO PREVENT RECURRENCE:

A.2 ALL FERRITIC MATERIAL SUITABLE FOR TEMPORARY ATTACHMENT WELDING WILL BE COLOR CODED. ALL AUSTENITIC MATERIAL WILL BE IDENTIFIED BY ITS MTN.

TO BE COMPLETED - MAY 30, 1980.

A.3 A SCHEDULE OF FOREMEN AND WELDER TRAINING WILL BE ESTABLISHED TO FAMILIARIZE WELDERS WITH CODE, SPECIFICATION AND CONTROL PROCEDURE REQUIREMENTS. SEE ACTION F.1.

SCHEDULE IS COMPLETED.
TRAINING MONTHLY THROUGH NOVEMBER 1980.

A.4 HEAVY DUTY GROUND CONNECTION CLAMPS WILL BE ORDERED FOR USE BY WELDERS.

ACTION COMPLETED.

DEVIATION NOTICE B

1. THE YELLOW COPY (FORM ZKW) WAS NOT RETAINED WITH THE QC COPIES OF THE PRODUCTION ORDER FOR JOB. NO. 707500 DWG. 2188 FOR THREE (3) TEMPORARY ATTACHMENT WELDS. IT WAS ALSO NOTED THAT THE TEMPORARY ATTACHMENT MATERIAL COULD NOT BE IDENTIFIED.

CORRECTIVE ACTION:

B.1 THE UNIDENTIFIED ATTACHMENT WELDS WERE REMOVED TO A DEPTH SUFFICIENT TO ELIMINATE CONTAMINATION AND THE AREA EXAMINED BY LIQUID PENETRANT.

ACTION COMPLETED.

ACTIONS TO PREVENT RECURRENCE:

B.2 FORM ZKW WILL BE REVISED TO PROVIDE FOR BETTER CONTROL OF RECORDING (AND TRACEABILITY) OF THE USE OF WELDING MATERIALS.

TO BE COMPLETED - JUNE 30, 1980.

DEVIATION NOTICE C

1. FORM ZGL WAS NOT INITIATED UPON DISCOVERY OF AN UNACCEPTABLE RADIOGRAPHIC INDICATION WITHIN A WELD ON JOB NO. 312251 DWG. 5798 IN THAT AN AREA OF THE WELD HAD AN EXCAVATION AND FORM ZGL WAS NOT WITH THE QC COPIES OF THE PRODUCTION ORDER.

CORRECTIVE ACTION:

C.1 FORM ZGL WAS ATTACHED TO DRAWING 5798, JOB NO. 312251.

ACTION COMPLETED.

ACTIONS TO PREVENT RECURRENCE:

C.2 WRITTEN INSTRUCTIONS HAVE BEEN ISSUED TO THE SHOP NOT TO PERFORM ANY REPAIRS BASED ON VERBAL INSTRUCTIONS UNTIL FORM ZGL IS FORMALLY ISSUED.

ACTION COMPLETED.

DEVIATION NOTICE D

PROCEDURE G-103 WAS NOT BEING ADHERED TO IN THAT A REVIEW OF PERSONNEL QUALIFICATION RECORDS REVEALED THE FOLLOWING:

1. TWO AUDITORS THAT WERE QUALIFIED TO PERFORM INTERNAL NUCLEAR AUDITS DID NOT RECEIVE A TOTAL OF 10 POINTS ON THE EVALUATION CRITERIA.
2. TWO AUDITORS DID NOT PASS THE WRITTEN EXAMINATION WITH THE REQUIRED 70% GRADE.

CORRECTIVE ACTION:

D.1 FILE HAS BEEN REVIEWED AND CERTIFICATES OF PERSONNEL NOT MEETING REQUIREMENTS OF PROCEDURE G-103 HAVE BEEN REMOVED.

ACTION COMPLETED.

ACTIONS TO PREVENT RECURRENCE:

D.2 A NEW FORM, SIMILAR TO FORM RECOMMENDED BY ANSI - N45.2.23 WILL BE USED TO RECORD AND CONTROL AUDITOR QUALIFICATION.

TO BE COMPLETED - JUNE 1, 1980.

DEVIATION NOTICE E

1. MINUTES AND A SIGNED ATTENDANCE RECORD WERE NOT MAINTAINED TO DOCUMENT PERFORMANCE OF TRAINING SESSION WITH NDE PERSONNEL (OTHER THAN THE NDE SUPERVISOR) ON THE USE OF FORM ZGL.

CORRECTIVE ACTION:

E.1 INSTRUCTIONS WITH RESPECT TO DOCUMENTATION OF TRAINING WILL BE REISSUED TO ALL DEPARTMENT MANAGERS.

TO BE COMPLETED - JUNE 1, 1980.

ACTIONS TO PREVENT RECURRENCE:

E.2 TRAINING RECORDS ARE TO BE MAINTAINED BY THE PERSONNEL DEPARTMENT TO PROVIDE A CENTRALLY LOCATED TRAINING RECORD.

ACTION COMPLETED.

E.3 WRITTEN INSTRUCTIONS HAVE BEEN ISSUED TO THE SHOP NOT TO PERFORM ANY REPAIRS BASED ON VERBAL INSTRUCTIONS UNTIL FORM ZGL IS FORMALLY ISSUED. SEE ACTION C.2.

ACTION COMPLETED.

DEVIATION NOTICE F

1. A 1/8 INCH DIAMETER, TYPE E7018 ELECTRODE (CODE RRR092) WAS OBSERVED ON MARCH 25, 1980, IN A SUBASSEMBLY FOR JOB NO. 707500, DRAWING 1931; WITH THE LAST RECORDED USE OF THIS SIZE AND TYPE OF ELECTRODE ON THE ASSEMBLY BEING MARCH 21, 1980.

ACTIONS TO PREVENT RECURRENCE:

F.1 A SCHEDULE OF FOREMEN AND WELDER TRAINING WILL BE ESTABLISHED TO FAMILIARIZE WELDERS WITH CODE, SPECIFICATION AND CONTROL PROCEDURE REQUIREMENTS. SEE ACTION A.2.

ACTION (SCHEDULING) COMPLETED.

F.2 SIGNS WILL BE POSTED IN ENGLISH AND SPANISH AT THE WELD SUPPLY ROOM WARNING WELDERS TO COMPLY WITH THE RULES ON USE OF COVERED ELECTRODES.

ACTION COMPLETED.

F.3 FOREMEN AND BAY INSPECTORS WILL BE INSTRUCTED BY MEMO TO MONITOR THEIR AREAS FOR PROPER STORAGE OF ELECTRODES.

ACTION COMPLETED.

DEVIATION NOTICE G

1. SUBMERGED ARC WPS SA1-1B, REVISION 2, AND SHIELDED METAL ARC WPS SM1-1B, REVISION 2 DID NOT INCLUDE USE OF WELDING PROCEDURE SPECIFICATIONS IN APPLICATIONS NOT REQUIRING POSTWELU HEAT TREATMENT (AN ESSENTIAL VARIABLE FOR BOTH PROCESSES), ALTHOUGH REQUIRED BY CURRENT SHOP DRAWINGS TO BE USED IN SUCH MANNER.

CORRECTIVE ACTION:

G.1 DRAWINGS, WHICH HAD BEEN REVISED TO COMPLY WITH THE PWHT EXEMPTIONS OF TABLE NX-4622.3-1 OF SECTION III OF THE CODE FOR PIPE WALLS LESS THAN 1 1/2 IN. THICK, WILL REQUIRE PWHT PENDING COMPLETION OF ACTION G.2.

G.2 PQR'S COVERING THE AS-WELDED CONDITIONS WILL BE ADDED TO PROCEDURES SA1-1B AND SM1-1B.

TO BE COMPLETED - MAY 30, 1980.

ACTION TO PREVENT RECURRENCE:

G.3 A MATRIX OF ESSENTIALS AND SUPPLEMENTARY ESSENTIAL VARIABLES COVERING TUBECO WELDING PROCEDURES WILL BE PREPARED TO DETERMINE EXTENT OF APPLICABILITY OF THE PROCEDURES. SEE ACTION J.2.

TO BE COMPLETED - MAY 30, 1980.

G.4 TESTS WILL BE PERFORMED COVERING THE OPEN MATRIX ITEMS (ACTION G.2).

TO BE COMPLETED AS REQUIRED FOR SPECIFIC PROJECTS.

DEVIATION NOTICE H

1. A PROCEDURE ADDRESSING CONTROL OF FURNACE SETTINGS WAS NOT ESTABLISHED UNTIL MARCH 26, 1980, AND AS A RESULT OF IDENTIFICATION OF ITS ABSENCE BY THE INSPECTOR.

ACTION TO PREVENT RECURRENCE:

H.1 PROCEDURE H-306, AVAILABLE IN DRAFT FORM AT TIME OF INSPECTION, WAS COMPLETED AND DISTRIBUTED TO THE PERSONNEL INVOLVED.

ACTION COMPLETED.

DEVIATION NOTICE I

1. PREHEAT TEMPERATURE WAS NOT RECORDED AS OK IN SPACE (12) OF THE TRAVELERS FOR JOB 312251, DRAWING 645 AND 649 TO PROVIDE VERIFICATION THAT THE MINIMUM SPECIFIED PREHEAT TEMPERATURE OF THE WELD PROCEDURE HAD BEEN MET FOR THE PRODUCTION WELDS IN THE ASSEMBLIES.

CORRECTIVE ACTION:

I.1 WE HAVE CONFIRMED WITH THE WELDER AND BAY INSPECTOR THAT THE PREHEAT REQUIRED HAS IN FACT BEEN APPLIED. TRAVELERS 645 AND 649, JOB NO. 312251 HAVE BEEN CORRECTED TO INDICATE COMPLIANCE.

ACTION COMPLETED.

ACTION TO PREVENT RECURRENCE:

I.2 THE NEED TO FILL IN ALL ITEMS OF A TRAVELER WHICH CANNOT BE OBJECTIVELY VERIFIED AT A LATER TIME WILL BE REEMPHASIZED TO THE BAY INSPECTORS DURING A TRAINING SESSION.

TO BE COMPLETED - MAY 15, 1980.

DEVIATION NOTICE J

1. PROCEDURE SPECIFICATION SM1-3, REVISION 1, DID NOT CONFORM TO THE INTERPASS TEMPERATURE REQUIREMENTS OF SECTION IX OF THE ASME CODE AND WAS NOT APPROPRIATELY QUALIFIED IN ACCORDANCE WITH THE POSTWELD HEAT TREATMENT AND IMPACT TEST REQUIREMENTS, RESPECTIVELY, OF SECTION IX AND SECTION III OF THE ASME CODE (SEE DETAILS II, B.14.).

CORRECTIVE ACTION:

J.1 A PQR COVERING THE INTERPASS TEMPERATURE SPECIFIED BY PROCEDURE SM1-3 WILL BE PREPARED.

TO BE COMPLETED - MAY 30, 1980.

ACTIONS TO PREVENT RECURRENCE:

J.2 A MATRIX OF ESSENTIAL AND SUPPLEMENTARY ESSENTIAL VARIABLES COVERING TUBECO WELDING PROCEDURES WILL BE PREPARED TO DETERMINE EXTENT OF APPLICABILITY OF THE PROCEDURES. SEE ACTION G.3.

TO BE COMPLETED - MAY 30, 1980.

J.3 TESTS WILL BE PERFORMED COVERING THE OPEN MATRIX ITEMS (ACTION J.2).

TO BE COMPLETED AS REQUIRED FOR SPECIFIC PROJECTS.

DEVIATION NOTICE K

1. ALL COVERED ELECTRODES ARE NOT STORED IN OVENS AFTER THEIR HERMETICALLY SEALED CONTAINERS HAVE BEEN OPENED.

TUBECO'S PRACTICE HAS BEEN TO OPEN THE HERMETICALLY SEALED CONTAINERS, REMOVE AND PLACE IN THE OVENS THE NEEDED AMOUNT, THEN TAPE OVER THE OPEN END OF THE CONTAINERS. THUS, THERE WERE NUMEROUS CONTAINERS WITH TAPED ENDS OBSERVED IN THE STORAGE AREA, PARTIALLY FILLED WITH COVERED ELECTRODES.

CORRECTIVE ACTION:

K.1 A MEMO HAS BEEN ISSUED TO THE WELDING SUPPLIES CLERK TO REVIEW PROCEDURE W-602 AND TO ADHERE TO ITS PROVISION AS WRITTEN.

ACTION COMPLETED.

ACTIONS TO PREVENT RECURRENCE:

K.2 PROCEDURE W-602 WILL BE REVISED TO DEFINE CONDITIONS UNDER WHICH CONTAINERS OF COATED ELECTRODES MAY BE OPENED AND RESEALED.

TO BE COMPLETED - JUNE 30, 1980.

DEVIATION NOTICE L

RODS OF DIFFERENT SPECIFICATIONS, THUS DIFFERENT MTN'S (MATERIAL TRACEABILITY NUMBERS), WERE MIXED TOGETHER IN THE SAME OVEN SECTION (SEE DETAILS SECTION III, PARAGRAPH B.5).

CORRECTIVE ACTION:

L.1 ALL OVENS HAVE BEEN AUDITED TO DETERMINE WHETHER OTHER CASES OF MIXED STORAGE HAVE OCCURRED.

ACTION COMPLETED.

ACTION TO PREVENT RECURRENCE:

L.2 WELDING ENGINEER HAS BEEN INSTRUCTED TO PERFORM FULL DOCUMENTED INSPECTION OF THE WELD STORAGE AREA AND OVENS TO ASSURE COMPLIANCE WITH PROVISIONS OF OUR PROCEDURES.

INSPECTIONS ARE TO BE ON A WEEKLY BASIS UNTIL FURTHER NOTICE.

DEVIATION NOTICE M.

1. EVEN THOUGH NEW FORMS HAD BEEN PREPARED, PROCEDURE G-115 HAD NOT BEEN REVISED TO IMPLEMENT THE NEW FORMS AND TO DELETE THOSE WHICH WERE NO LONGER SERVING A USEFUL PURPOSE.

COMMENTS:

PROCEDURE G-115 WAS NOT RELEASED SINCE IT WAS INTENDED TO BE COMPATIBLE WITH THE PIPE FABRICATION INSTITUTE (PFI) PROCEDURE FOR VERIFICATION OF VENDOR PERFORMANCE. THIS PROCEDURE HAS NOT YET BEEN RELEASED.

CORRECTIVE ACTION:

M.1 PROCEDURE G-115 WILL BE RELEASED COMPATIBLE WITH THE CURRENT STATUS OF THE PFI PROCEDURE AND WILL BE REVISED AS NECESSARY.

TO BE COMPLETED - MAY 30, 1980.

10CFR21 DEFICIENCY

1. NEITHER THE REGULATIONS, SECTION 21.6 OF 10CFR PART 21 NOR THE PERMITTED SUBSTITUTE WERE POSTED IN THE T-BAY ALTHOUGH ACTIVITIES WERE IN PROGRESS THAT WERE SUBJECT TO THE REGULATION.

CORRECTIVE ACTION:

21.1 A REPLACEMENT NOTICE HAS BEEN POSTED IN THE T-BAY.

ACTION COMPLETED.

ACTIONS TO PREVENT RECURRENCE:

21.2 ALL POSTED NOTICES REQUIRED BY SECTION 21.6 OF 10CFR21 WILL BE PROTECTED BY PLEXIGLASS TO PREVENT ACCIDENTAL OR UNAUTHORIZED REMOVAL.

TO BE COMPLETED - MAY 30, 1980.

21.3 POSTING REQUIREMENTS WILL BE INCLUDED IN THE GAM AND VERIFICATION OF POSTING WILL BE MADE PART OF THE INTERNAL AUDIT PROCEDURE.

TO BE COMPLETED - TWO MONTHS AFTER RECEIPT OF 1980 ASME CODE.