# Hirata Valve Industry Co., Ltd.

OFFICE:
9-11, 4-CHOME, SHIMBASHI,
MINATO-KU, TOKYO
P. O. BOX 121 SHIBA
TELEX: 0-242-2519/HIKATA J
CABLES: "VALVEHIRATA" TOKYO
TEL: 03-(431)5176-9

MAIN PRODUCTS:
CAST STAINLESS STEEL, CAST STEEL,
FORGED STEEL & OTHER ALLOY STEEL VALVES
BANKERS: THE DAI-ICHI KANGYO BANK LTD
THE MITSUBISHI BANK, LTD

FACTORY:
15, HISAMOTO
TAKATSU-KU, KAWASAKI,
TEL: 044-(833)-2311~7
N ASME


Kawasaki, April 15, 1980
Our Ref. No. SH-359

United States
Nuclear Regulatory Commission
Region IV
Attention: Mr. Karl V. Seyfrit
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76012
U. S. A.

Gentlemen:

Subject: Response to Docket No. 99900355/80-01

We acknowledge receipt of your inspection report, Docket No. 99900355/80-01, dated February 22, 1980.

Upon receipt of the docket, we have studied those problems reported therein, for which we have taken or will take corresponding corrective actions and preventive measures as summarized in a Response Statement enclosed.

Now that such actions and measures have been taken by us, it is considered that the deviations from commitment were successfully settled and our QA program is being implemented in compliance with the NRC requirements.

This is also to inform you that no information of proprietary nature is contained either in the Docket mentioned above or in the Response Statement enclosed.

We hope this will meet with your requurements.

Sincerely yours,

Y. Hirata
Vice President, Kawasaki Div.
Hirata Valve Industry Co., Ltd.

Enclosure 1: Hirata Valve Response Statement

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Hirata Valve Industry Co.Ltd

# Hirata Valve Statement
# in response of Docket No. 99900355/80-01

## Deviation "A"

### 1. Findings

The Hirata Valve Industry Co. Ltd. (HV) corrective action response letter of November 12, 1979, states in part with respect to Item B in the Notice of Deviation in Inspection Report No. 79-02, ". . . Two (2) WPSs to be revised as stated in paragraph 2 above, will be submitted to the Customer by the end of November 1979, and the revision of the relative DWPs will be made within ten (10) days after receipt of the Customer's approval of the WPSs . . . ."

Contrary to the above, the two revised WPSs were not submitted to the Customer for approval until January 7, 1980, although revised on November 26, 1979.

### 2. Steps that have been or will be taken to correct the problem

With respect to the correction of the date the WPSs were submitted to the Customer, a corrected letter was submitted to you on April 8, 1980.

### 3. Steps that have been or will be taken by Hirata to prevent recurrence

a. To each deviation, the Vice President, Kawasaki Division, shall issue a written request for corrective action on the deviation involved to the responsible Section Chief(s) for implementation of the corrective action requested.

b. Upon verification of the satisfactory implementation, the responsible Section Chief shall report directly to the Vice President in writing not later than the date required.

c. With regard to this particular deviation, personnel concerned was given training to prevent recurrence.

### 4. Date corrective actions/preventive measures were or will be completed

a. The corrective action as stated in para. 2 above, was completed on April 8, 1980.

b. The preventive measures as stated in para. 3 above, were completed on March 6, 1980.

Deviation "B"

1. Findings

Paragraph NCA-4134.12 in Section III of the ASME Code states in part, "Measures shall be established and documented to assure that tools, gages, instruments, and other measuring and testing equipment and devices used in activities affecting quality are of the proper range, type, and accuracy to verify conformance to established requirements . . . . When discrepancies in measuring or testing equipment are found at calibration, the Certificate Holder shall determine what corrective action is required. Material and items previously checked ( since the previous valid calibration) with equipment which is out of calibration shall be considered unacceptable until the Certificate Holder can determine that all applicable requirements have been met . . . ."

Contrary to the above, the HV QA program did not require determination of necessary corrective action for items on which tools had been used by manufacturing personnel in an activity affecting quality, that were found during a subsequent calibration check to be discrepant. (See Deta ils, D.3.a(1))

2. Steps that have been or will be taken by Hirata to correct the problem

With respect to the requirements for calibration control of torque wrenches maintained and used by the Manufacturing Section, the QA program, calibration control procedure No. GNAF-37, Revision 1, and the procedure No. HSS-001, Revision 1, were respectvely revised to include the following:

Procedure Nos. GNAF-37, Revision 2, and HSS-001, Revision 2;
" Calibration of torque wrenches maintained and used by the Manufacturing Section shall be controlled in accordance with GNAF-37".

With these Revisions the calibration of the torque wrenches are now controlled in accordance with procedure GNAF-37, which is in full compliance with paragraph NCA-4134.12, Section III of the ASME Code.

3. Steps that have been or will be taken by Hirata to prevent recurrence

With respect to the calibration control requirements of the ASME Code and Hirata calibration procedure, all personnel involving procedure preparation, were given training and indoctrination.

4. Date corrective actions/preventive measures were or will be completed

a. The corrective actions as stated in para. 2 above, were completed on March 31, 1980.

b. The preventive measures as stated in para. 3 above, were completed on March 31, 1980.

Deviation "C"

1. Findings

Paragraph 3.2 in HV Procedure No. GNAF-37, Revision 1, states in part, ". . . A-type devices shall be calibrated against Hirata master tools and standards in accordance with calibration methods applied by Hirata . . ." Paragraph 4.1 in HV Procedure No. GNAF-37, Revision 1, states with respect to personnel responsibilities, "Calibration Control Technician performs servicing and calibration, maintains records, recalls devices to be calibrated, requests disposition for out-of-calibration devices, and other necessary actions prescribed in this Calibration Control Procedure."

Contrary to the above:

1. An A-type device, Pressure gage S. No. 258, was not calibrated on December 17, 1979, in accordance with Hirata calibration methods, as evidenced by the use of a 1000 Ks/cm$^2$ calibration point in place of the 800 Kg/cm$^2$ calibration point required by the applicable calibration method, GNAF-37-2-6.

2. A disposition was not requested for a dial caliper, S. No. C-04, which was found during calibration on November 7, 1979 to have an error in excess of the tolerance permitted by the applicable calibration method, GNAF-37-1-3. i.e. An error of 0.05 mm was measured for the gage against an allowed tolerance of 0.03 mm.

2. Steps that have been or will be taken by Hirata to correct the problem

a. The calibration record and chart of the pressure gage No. 258 having been examined, it was verified and evidenced by the calibration chart that the gage had been calibrated by the use of 800 Kg/cm$^2$ calibration point in place of 1000 Kg/cm$^2$ calibration point and the discrepancy had been due to mis-posting the records from the chart to the record sheet.
The calibration record was corrected on February 15, 1980, to reflect the chart.
Pressure Gage No. 258 has been calibrated on March 14, 1980, and was found to be correct.

b. The measuring equipment issue control records for the period from the previous valid calibration date of November 16, 1978 to January 23, 1980, have been examined. It was verified that the dial caliper No. C-04 had never been used for the Code construction during the period.
The caliper was within the allowed tolerance range as of January 28, 1980, and the caliperwas reinstated to an acceptable status.

3. Steps that have been or will be taken by Hirata to prevent recurrence

The QA Manager conducted training and indoctrination of all personnel concerned, with respect to the significance of the calibration status.

4. Date corrective actions/preventive measures were or will be completed

a. The corrective actions as stated in para. 2 above, were completed on March 14, 1980.

b. The preventive measure as stated in para. 3 above, was completed on March 12, 1980.

Deviation "D"

1. Findings

Table 4 in Procedure No. NAF-21, Revision 1, states in part with respect to applicable cleaning requirements subsequent to hydrostatic pressure tests, ". . . 2.1 Immediately after the tests, the valve interior shall be rinsed by water. (Ref. Table 3 for proper water quality to be applied) 2.2 Water drop shall be blown off with compressed air and wiped off with a dry clean cloth to have the interior completely dry . . .". 4. Inspection. The inspector from the Inspection Section shall conduct the the visual examinations . . . . 5. Records. The results of cleaning work and inspections shall be recorded on the Form as defined in 5. of CL. 5."

Sub-paragraph 10.1.3 in procedure NAF-21, Revision 1, states with respect to requirements for Class B surface cleanliness, "There shall remain no organic material, paint nor oil residue on the surface."

Contrary to the above, the following was noted on January 24, 1980, with respect to a SA 351 Grade CF8 austenitic stainless steel Class 2 gate valve, ID No. NO184A, which had been signed off on January 22, 1980, on Sequence No. 256-257 of MO No. NO184-AS R.0, as having been cleaned and inspected to Class B cleanliness subsequent to hydrostatic test:

1. Condensed water was present on the inside surfaces of caps in the valve openings.

2. An organic material, i.e. grease film was present on the valve internal surfaces adjacent to the weld preparations.

3. The results of the cleaning work and inspection had not been required by MO No. NO184-AS R.0 to be, nor was recorded on the designated forms.

2. Steps that have been or will be taken by Hirata to correct the problem

a. The internal surfaces of valve, ID No. NO184, was re-cleaned, re-dried and re-inspected in accordance with the requirements specified by the procedure, NAF-21, Revision 1.

b. The results of re-cleaning work and re-inspection were recorded on the Form 1 and Form 2 respectively as required by the nonconformance report (DO), No. 0128-3.

3. Steps that have been or will be taken by Hirata to prevent recurrence

a. With respect to the requirements for recording the results of cleaning

work and inspection on the designated forms, all personnel concerned were given training and indoctrination.

b. The results of cleaning work and inspection will be required by the MO.

4. Date corrective actions/preventive measures were or will be completed

a. The corrective actions as stated in para. 2 above, were completed on January 29, 1980.

b. The preventive measures as stated in para. 3 above, will be completed by April 22, 1980.

Deviation "E"

1. Findings

Paragraph 4.14.1 in Section 4 of the QA Manual states in part, "Designated personnel from the QE Section shall examine all Code Items prior to packaging . . . ."

Paragraph 7.1 in Specification No. NAF-33, Revision 2, states in part with respect to packaging requirements, ". . . However, before applying the plugs, caps and seals onto the openings of the valve, reinspect the valve interior to see there remains no residue such as water out of the pressure test, sand out of the surface preparation work, smear out of the pressure tests, and/or other contamination."

Contrary to the above, the following was noted with respect to SA 216 grade WCB Class 3 gate valves, Valve ID Nos. 0215 A-H, which were observed capped and sealed in a shipping case and signed off on Sequence No. 259-260 of MO No. NO215-AS R.1, as having been packed in accordance with Specification No. NAF-33, Revision 2, on January 24, 1980:

1. No evidence was made available to the inspector to confirm the valves had been examined by QE Section personnel prior to packaging.

2. MO No. NO215-AS R.1 did not require a reinspection for cleanliness to be performed prior to application of caps and seals onto the valve openings.

3. Packaging inspection in accordance with Specification No. NAF-33, Revision 2, was called out on the MO as the sequence following packaging, i.e. 260-261, and was unsigned as of this inspection. (See Details, F.3.a(2))

2. Steps that have been or will be taken by Hirata to correct the problem

The operational steps concerned with the Deviation "E" are sequence Nos. 259-260 (Packing) and 260-261 (Packing Check), in which the QA hold point is always included, however this finding is caused due to the combined description for the operational sequence shown on the MO.

The actual status of the QA/QC activities for the valves, ID No. NO215 A-H, was as follows:

(a) The QE person completed the examination of the valves and relative records in accordance with the requirements specified by the

QA Manual prior to packaging, however he did not sign off on the NO until completion of packing check designated at the sequence No. 260-261 (Packing Check).

(b) The procedure NAF-33 specified at sequence No. 259-260 and No. 260-261 requires the cleanliness inspection of the valves prior to application of caps and seals onto the valve openings. The results of the inspection are to be recorded at the four (4) check points on the Final Inspection Report (FIR) which accompanys the Preshipment Inspection Checklist (PIC), fourteen (14) checkpoints specified thereon.

On the FIR, four check points shown below are given:
(1) Valve No. and Serial No. shown on valve Name Plate comply with Valve Packing List.
(2) Valve is properly sealed and packed. (including protection of weld ends).
(3) Shipping marking, Identification Marking and Caution Marking are correct and comply with Packing List and Procedure.
(4) Packing List is attached on wooden case.

Number 3, 4 and 5 check points among 14 check points on the PIC are as follows:
Check point No. 3: No damage on the inner and outer surfaces of the valve openings.
Check point No. 4: Valve interior is throughly dried.
Check point No. 5: Inner and outer surfaces are free from the material adverse to the quality, such as dirt, dust, contamination, stain, water and oil, etc.

(c) Check points Nos. 1and 2,on the FIR, and Nos. 1 thru 8, on the PIC, were filled out on January 24, 1980, at the time when Sequence No. 259-260 was completed.
Check points Nos. 3 and 4, on the FIR and Nos. 9 thru 14, on the PIC, were filled out on January 25, 1980, at the time when Sequence No. 260-261 was completed.
At the time when Sequence No. 260-261 was completed, the PIC and FIR Reports were dated and signed by QC/QA personnel.

(d) The QA person designated and QC inspector signed off on the NO at the Sequence No. 260-261 as specified by the NO on January 25, 1980, after completion of packing check.
The FIR Report number (FIR-0134H) was also listed on the NO at that time.

Because the QA/QC activities were correctly conducted as stated above, no corrective action was taken on this problem.

3. Steps that have been or will be taken by Hirata to prevent recurrence

a. With respect to the MO, the sequence for final acceptance will be revised. Sequence No. 259-260 for final inspection prior to application of caps and seals will be designated as a QA Hold Point and a QC inspection. Sequence No. 260-261 will be designated as a QC inspection.

b. The FIR Form will be modified to record the dates of pre-packaging inspection and post-packaging inspection, and will be listed on the MO for sequences Nos. 259-260 and 260-261.

c. With respect to the requirements for final acceptance specified by the QA Manual and NAF-33, all personnel concerned were given training and indoctrination.

4. Date corrective action/preventive measures were or will be completed

a. Corrective action: N/A

b. The preventive measures as stated in para. 3 above, will be completed by April 25, 1980.