

EXXON NUCLEAR COMPANY, Inc.

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August 5, 1980

Uldis Potapovs, Chief
Vendor Inspection Branch
U.S. Nuclear Regulatory Commission Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76012

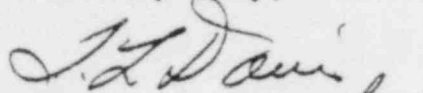
Dear Mr. Potapovs,

REFERENCE: Docket No. 99900081/80-01

A response to the Notice of Deviation contained in the reference transmitted by your letter of June 25, 1980 is attached.

Should you have any additional questions on these matters please feel free to call me at (509) 375-8257 or Theron Davis at (509) 375-8243.

Yours very truly,



C.J. Volmer, Manager for
Corporate Quality Assurance

cc: W.M. McNeill
T.L. Davis

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Attachment 1

Nuclear Regulatory Commission Notice of Deviation:

Based on the results of an NRC inspection conducted on June 10-12, 1980, it appears that certain of your activities were not conducted in accordance with NRC requirements.

Section 5.0 of the Exxon Topical Report, XN-NF-1A, states in part, "The Quality Assurance Program and associated quality - related design, procurement, manufacturing, inspection, handling, and shipping activities are prescribed by documented instructions, procedures, and drawings, as appropriate, to assure adequate definition of and instruction for satisfactory completion of activities. The instructions, procedures, and drawings include qualitative and quantitative acceptance criteria to verify that important activities have been satisfactorily accomplished."

Deviations from these requirements are as follows:

A. Deviation: Exxon Quality Assurance Procedure, No. 8, Revision 1, Paragraph 1.2 states in part, "All constituent parts and materials of the fuel assembly are then traceable through fabrication records to the starting material."

Contrary to the above, some materials were found to be not traceable, for example:

1. Weld wire used to weld the funnel tube to the upper tie plate was not recorded for the cruciform design fuel assemblies.
2. The lot identification of Guide Tube Screws was recorded erroneously the release number was not the correct release number for fuel assembly 88A-622 (See Details, paragraph E.3.c.(1)).

ENC Response: Specific action taken by ENC in response to the two examples cited above are as follows:

1. The weld wire release number (8889) was entered on the fuel assembly follower card prior to completion of the inspection and the follower card

form was re-issued on 6/15/80 to provide a space to enter the weld wire release number. A review of 8 other follower cards for items which require use of weld wire revealed that the follower card provides space to record the release number. Since the weld wire in use is the only weld wire of the required size in use at ENC and since the lot was properly released for use 3/27/78, there is no question as to the proper identity of the materials used. Preventive and corrective actions for this item are complete.

2. The identity of Guide Tube Screws used on assembly BBA-622 was determined to be Lot #12405 from assembly station work log. Other assemblies fabricated were also reviewed against assembly station work logs and it was determined that additional assemblies preceding BBA-622 had the wrong guide tube screw lot number (10408) recorded. All records were corrected to reflect the proper guide tube screw lot number (#12405) on or before 6/17/80. As a result of these errors in recording proper lot numbers on follower cards, a training session was conducted for all spacer assembly and cage assembly personnel by section supervision. This training was completed on 7/3/80.

B. Deviation: Exxon Quality Control Standard, XN-S68146, Revision 3, paragraph 5.4, states in part, "All storage containers or bags shall display a tag or card affixed to the container indicating . . . (3) cleaning date,"

Contrary to the above, some materials were found which were not identified with a cleaning date hence the cleaning status was lost. For example, two lots of Guide Bar Locking Rings 9701 and 6316 and a lot of Hold down Springs 11972 were found to be in use, but with no identification of the cleaning status, for example: cleaning date (See Details, paragraph E.3.c.(2)).

ENC Response: As noted in the inspection report, it was determined during the audit that lots #9701 and #11972 had been cleaned. Since it could not be verified by other documentation that lot #6316 had been cleaned, it was recleaned the same day that the auditor questioned the cleaning status. Loose holddown springs from Lot #11972 were also cleaned the same day. A review of other clean components in the area on 6/11/80 revealed no additional components without their cleaning status identified. As a result of this failure of the operators to verify cleaning status prior to use of components, a training session was held on 7/3/80 to discuss and re-emphasize the requirements of Exxon Quality

Control Standard XN-S68146 with regard to the operators responsibility to assure that the required documentation remains with the components.