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W. C. GALLAWAY
Executive Vice President

February 28, 1980

Ref: Docket No. 99900004/80-01

Mr. Uldis Potopovs
Chief, Vendor Inspection Branch
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Dear Mr. Potopovs:

This is in response to your report of a deviation and three unresolved items identified during your Mr. Mc Neill's inspection of our QA Program January 7-11, 1980. The attached detailed response is organized to correspond to your Summary, and we believe it to be self-explanatory. Should you have any questions or require further clarification, please feel free to contact our Mr. T. R. Colandrea at (714) 455-4570.

Sincerely,

W. C. Gallaway
Executive Vice President

Attachment

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ATTACHMENT A: Detailed Response

Deviation

"The General Atomic Quality Assurance Manual, dated November 17, 1978, section 6, paragraph 3, states in part, "Each product document shall be reviewed prior to release to assure that all requirements are sufficiently, clearly, and accurately stated. . . . The approval shall be indicated by signature or stamp and date on the document."

"Contrary to the above, it was observed that the review of product documents did not assure that all requirements are sufficiently, clearly, and accurately stated. Also, the approval of documents was not indicated by signature, etc."

Response to Deviation

Action to Correct Observed Condition

The coater operating procedure (OP 431401 - Issue A) is being revised to reference the correct parameter sheet by deleting run sheet (OP 431402) and replacing it with parameter sheet FMD 1197. This parameter sheet is being revised to require process engineer approval.

Action to Prevent Recurrence

The observed problem arose from deficiencies in the form and procedure. A one-time review of the fuel manufacturing process forms and procedures is in work to assure that each procedure contains all necessary control elements.

Schedule for Completion of Actions

Action to correct observed condition - 2/29/80
Action to prevent recurrence - 3/15/80

Unresolved Item No. 1, "Fuel Rod Manufacture"

Several recent changes in the specification have yet to be incorporated into procedures. For example, QDI 30-11 did not reflect the current specification requirements for impurities; QDI 30-4 did not reflect the current sampling requirements for iron content. Lots of fuel rods are currently being reviewed and released based on the new requirements of the specification.

Response to Unresolved Item No. 1

Action to Correct Observed Condition

The Quality Department Instruction (QDI) 30-11 and 30-4 did not reflect the current specification because there were recent

changes less than a month before the audit. Both procedures (QDI 30-4, "Sampling Plan for Type R-2 Fuel Rods," and QDI 30-11, "Preparation of Fuel Rod Release Sheets") are being revised to include the current specification requirements (Specification GA-10600, Issue AB).

Action to Prevent Recurrence

Because fuel manufacturing activities were shut down during the Christmas holidays, ten working days had elapsed between release of the Change Notice covering the new sampling requirements and the audit. Additional administrative controls, including clarification of responsibility assignments, have been instituted to reduce the time for procedure updating in such cases.

Schedule for Completion of Actions

Action to correct observed condition - 3/15/80
Action to prevent recurrence - Completed 2/22/80

Unresolved Item No. 2, "Graphite Fuel Blocks"

The design call outs for the material specification for the graphite are contradictory. The drawing call out is for a new material specification 18-R-51 but the fuel specification leads to an older generation material specification 396-F0-1M. Current material on hand that is to be used for Segment 8 reload will comply only with the older specification.

Response to Unresolved Item No. 2

Action to Correct Observed Condition

Applicable drawings have been revised and reissued to show the older material specification, 396-F0-1M, to which Fuel Segment 8 blocks were purchased.

(Note: The "H" revision of the drawing in question had been prepared with the material specification 18-R-51 called out against the possibility of future purchases involving a different graphite composition.)

Action to Prevent Recurrence

All Segment 8 blocks will be fabricated from blocks presently in inventory. New drawings will be issued for purchases for subsequent reloads.

Schedule for Completion of Actions

Action to correct observed conditions - Completed 1/25/80
Action to prevent recurrence - To be determined on the basis of future procurement schedules.

Unresolved Item No. 3, "Action on Previous Inspection Findings"

The inprocess inspection procedure QDI 23-1, Fuel Manufacturing Process Control, was revised to address review of documents at work stations. However, the current revision C contains an inconsistency on the reporting of findings between paragraphs 6 and 8. Paragraph 6 requires an NR form to be used and paragraph 8 a Potential Reject Condition form. Currently the latter form is being used.

Response to Unresolved Item No. 3

Action to Correct Observed Condition

Procedure 23-1 is being edited to clarify the use of the potential reject form. The potential reject form was to be an informal communication within the department. It should be noted that the potential reject form is not used in any case involving actual non-conformance of the fuel.

Action to Prevent Recurrence

Not applicable.

Scheduled Completion Dates

For action to correct observed condition - 2/28/80

For action to prevent recurrence - Not applicable