



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

Attention: Mr. H.W. Roberds

Subject: Response to Deviation

Reference: Q.A. Programs Inspection by NRC (H.W. Roberds 4-8 Feb. 1980)

- A. Deviation - Bechtel Power Corporation Specification 5023-409-2, SCE No. 4129 September 1, 1974, paragraph 4.9.7.3, sub-paragraph 3, states in part, "Each chart trace shall be identified with an individual piece, indicate the location of the thermocouple on the piece, and location of the piece in the furnace."

Contrary to the above, heat treatment chart trace for thirty-four (34) rear bracket assemblies, Job No.2383N, P.O. No. X-20655, was not identified with an individual piece and did not indicate the location of the piece or the location of the piece in the furnace.

Cause - These specific customer requirements for identification of heat treat charts was not incorporated into the PSCo internal control document. The internal control document was approved by the customer without regard for this requirement.

Action to correct - deviation The internal control document will be corrected to incorporate this customer requirement.

Action to preclude recurrence - Correction of the internal control document to incorporate this requirement will solve this problem. Additionally, in order to prevent future occurrences for other requirements omitted, technical specifications, purchase orders from customers, and related documents will be reviewed with more detail by the Quality Department.

- B. Deviation - Section 5 of the Quality Assurance Manual, paragraph 5.2.4, states in part, "A change in manufacturing technique may require a change in the Master Manufacturing Outline (MM)/MAO). The review and approval cycle remains the same, to include required changes to Manufacturing Reliability Control (MRC) Sheets and ANI review."

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Contrary to the above, the review and approval cycle did not remain the same for MMO/MAO for Shop Order Number 1-1915-3612 MTL Code N1354-V, Part No. 1801265-01, in that a change was made on 9/21/79 and the date of ANI review was 6/20/79, three (3) months prior to the change.

Cause - The MMO/MAO was not submitted to the ANI for review for the change made to the MMO/MAO.

Action to preclude recurrence - The PSCo Q.A. Manual will be changed at the next revision to require review and approval of MMO/MAO's for parts at time of initial writing. Subsequent changes to MMO/MAO's will require re-review by ANI when either Code required work is affected or in ANI hold point is affected.

C. Deviation - Section 10 of the Quality Assurance Manual, paragraph 10.2.1, states in part, "It is permissible for production personnel to alter the manufacturing sequence without revising the MMO provided Q.A. and the Authorized Nuclear Inspector hold points are not by passed."

Contrary to the above, production personnel had altered the manufacturing sequence without revising the MO for shop order 1-1910-3349 Part No. 1801239-1 and a QA hold point operation 30 "Indent stamp Code No." had been bypassed. It was also noted that operation 40 "C drill, drill and tap" was stamped by production and QA as being complete, although the tap portion of the operation had not been accomplished.

Cause - There was a lack of regard and attention on the part of both Manufacturing and Q.C. regarding the manner in which manufacturing outlines will be handled with respect to alternations and verifications.

Action to correct deviation - The manufacturing outline was returned to Q.C. for reverification of work not performed and signoff of the M.O.

Action to preclude recurrence - A corrective action response was generated by Q.A. to the Manufacturing and Q.C. departments, outlining the responsibility of each in the area of M.O. changes, verification of work and Q.A. hold point.

Nuclear Division



Additionally, both department supervisors were instructed to insure that all individuals within their group be made aware of these specific requirements.

I hope these responses are satisfactory in answering the audit findings. If there are any questions or additional comments, please contact either Paul A. Hadnagy or this writer.

Sincerely,

Bill Jenkins

Bill Jenkins
Supervisor, Nuclear Q.A. Programs