

PACIFIC
SCIENTIFIC
May 28, 1980

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

Attention: Mr. H.W. Roberds

Subject: Response to Deviations

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

A. Deviation - 'Heat treat chart trace did not identify individual pieces and did not indicate location of thermocouple on pieces or location of pieces in furnace.'

Resolution - Sketch has been attached to heat treat procedure to identify location of thermocouples and pieces in furnace. Certification by the subcontractor will be to this procedure. The procedure has been approved by PSCo and meets the specific contractual requirements.

B. Deviation - 'Change to Master Manufacturing Outline requires re-review by third party inspection. This requirement has not been met in all cases.'

Resolution - It was never PSCo's specific intention to have third party inspection re-review all changes to all manufacturing outlines. The majority of these changes are minor in nature. As an example; a change from manufacture on machine A to machine B, a change in time rates, a change from a 1" \emptyset bar to a larger or smaller size dependant upon availability of material. The changes intended for third party re-review were changes which involved ASME Code require work, i.e., welding, heat treatment, N.D.E., or work for which specific hold points had been established by the third party inspector. The next revision of PSCo's Quality Assurance Manual will reflect this philosophy. The third party inspector has agreed with this philosophy in principal.

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- C. Deviation - 1. Q.A. Hold Points hypassed.
2. Operation stamped as completed. Operation not completed.

Resolution - The bypassing of the referenced Q.A. hold point at operation 30 was inadvertent and should have been stamped. The intention was for the drilling operation to take place prior to the indent stamping of the parts. The Q.C. inspector and manufacturing lead man had agreed that this would be accomplished. However, the inspector neglected to contact the QA Engineer to move the hold point at operation 30. Both the Q.C. inspector and the manufacturing lead man have been reinstructed to insure that Q.A. hold points not be bypassed without a Q.A. Engineer sign-off on the change. Regarding the operation that was stamped off by the inspector prior to completion of the actual work, this was a lack of attention to his work by the inspector. He has been cautioned in this regard by his supervisor and this writer.

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

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