

GENERAL  ELECTRIC

NUCLEAR ENERGY
PRODUCTS DIVISION

WILMINGTON MANUFACTURING
DEPARTMENT

CASTLE HAYNE ROAD • P. O. BOX 780 • WILMINGTON, N. C. 28402 • (919) 343-5000

9 October 1980

United States Nuclear Regulatory Commission
Office of Inspection and Enforcement - Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76012

Attention: Mr. U. Potapovs, Chief, Vendor Inspection Branch

Dear Sir:

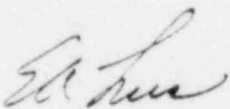
This letter is in response to Inspection Report No. 99900003/80-02 as documented in your letter of September 10, 1980.

General Electric, Wilmington Manufacturing Department, submits the attached responses to the findings identified by Mr. WM McNeill of your office.

We have reviewed the report issued under your letter of September 10, 1980 and found nothing considered proprietary about the information provided therein.

Should you or your staff have any questions regarding this letter, we will be glad to discuss them with you.

Sincerely,



EA Lees, Acting General Manager
Wilmington Manufacturing Department

nbk

Attachments

8011060262

US NRC INSPECTION REPORT NO. 99900003/80-02

DEVIATION

It appeared that certain of your activities were not conducted in full compliance with NRC requirements as indicated below:

Section 5, Instructions, Procedures and Drawings, of the General Electric Topical Report, NEDO-11209-04A, states in part, "Activities affecting quality, . . . are delineated, accomplished, and controlled by such documents as policies, procedures"

Deviations from these requirements are as follows:

Procedure P/P 70-33, Sections 5.2.2 and 5.7.3 require attachment of a copy of the Inspection Report (IR) to the nonconforming material and segregation of the nonconforming channels from acceptable channels.

Contrary to the above, a Cart (#31) of sixteen (16) channels was found. On this cart three (3) acceptable channels were found and thirteen (13) unacceptable channels. One channel on this cart did not have an IR with the channel that had been issued against that channel. Another channel on this cart had an IR with it which had been issued against some other channel.

RESPONSE TO DEVIATION

The discrepancies noted were corrected prior to completion of the inspection. The three acceptable channels were segregated from the nonconforming material and the appropriate Inspection Reports were attached to their respective channels. Since the incident, however, P/P 70-33 has been revised and the requirement for storage of nonconforming channels on a separate arm of the cart away from acceptable parts has been deleted. As a result of large product size and the potential of handling damage, the separation requirement was considered to be impractical. However, each channel is identified with a unique serial number and individual traveler. Also, a system does exist for IR control to prevent inadvertent release of nonconforming material. P/P 70-33 requires that the traveler be attached to each channel, that all nonconforming channels be appropriately tagged (Nonconforming Material), and that the IR be attached. Since this requirement was not totally implemented on the two subject channels, every channel in the building is currently being reviewed for appropriate paperwork and all inconsistencies are being corrected. This program is scheduled for completion by October 31, 1980. Existing procedures which include recording the IR number on the traveler and logging with Certification and Release preclude the release of discrepant products.

In addition, all shop and inspection personnel involved with channel fabrication are being counselled through normal roundtable meetings on the importance of material control and assuring that all relevant paperwork is attached to the channels.

OPEN ITEM

The General Electric specification on welding of zirconium alloys identifies chemistry requirements. General Electric has yet to fully document its justification on control of the chemistry requirements via visual standards. General Electric agreed to document its rationale in a Quality Notice by the next inspection.

RESPONSE TO OPEN ITEM

QN S-123, Rev. 1, was issued on September 15, 1980. Attachment 1 of subject document provides the justification for the control of the chemical requirements specified in P8AYP5 utilizing the approved weld color visual standards. This document is on file in the QA&CS offices and can be reviewed by the NRC during the next inspection at WMD.