SQUARE D COMPANY

EXECUTIVE PLAZA · PALATINE, ILLINOIS 60067

EXECUTIVE OFFICES

PAUL R. GOUDY
VICE PRESIDENT
ENGINEERING

TELEPHONE (312) 397-2600

September 22, 1980

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

Re: Docket No. 99900717/80-01

Re: QA Program Inspection of Square D
Raleigh Plant June 16 - 20, 1980

Dear Mr. Potapovs:

I am attaching a copy of a memo addressed to me from Mr. D. J. Beck, Plant Manager of our Raleigh, North Carolina Plant, forwarding a statement dealing with the report forwarded to me with your letter of July 31.

You will note that Mr. Beck indicates that all corrective action and preventive measures have been completed.

Since all action in correcting deviations must be taken at the plant level, we would greatly appreciate that your letter of transmittal of reports on future inspections be directed to the Plant Manager with a copy to me. This will greatly expedite any corrective action and a reply.

Yours very truly,

P. R. Goudy

PRG:kg
Att.

CC: D. J. Beck - Raleigh Plant
G. Lofgren - Milwaukee Plant

ROUTE TO:

SQUARE D COMPANY

INTER-OFFICE

TO: Palatine

FROM: Raleigh

ATTENTION: P. R. Goudy

BY: D. J. Beck

DATE: September 5, 1980

SUBJECT: NUCLEAR REGULATORY COMMISSION

C.C.: J. N. Daniel - ASHE
W. J. Fightmaster - QM
G. Q. Lofgren - MILW

Re: Raleigh Inspection
June 16-20, 1980

Dear Paul:

Attached are two copies of a report which details the actions taken by the Raleigh plant in response to the deviations reported by the NRC in its 31 July 1980 letter to you.

The report repeats each deviation verbatim, followed immediately by the corrective action and preventive measures we have taken.

As shown by the effectivity dates, all corrective actions and preventive measures have been completed.

D. J. Beck
Raleigh Plant Mgr.

DJB:ns
att.

SQUARE D COMPANY
Control Group - Raleigh Plant

NRC Docket No. 99900717/80-01

CORRECTION OF DEVIATIONS

A. Standard Practice Instructions No. P654, E-131b, dated February 14, 1980, contains the following requirements:

1. Paragraph III.B.1 states, "First pieces inspection will be conducted in accordance with SPI P653, M-206 and results recorded on Setup and Run Sample Inspection Sheet R3059".

Contrary to the above:

The Setup and Run Sample Inspection Sheet, start date of June 16, 1980, for Part No. 31041-030-01, Revision M, had not been completed as required. (See Details Section, Paragraph C.3.a).

Corrective Action:

The Accept/Rej. status of each line entry on Setup and Run Sample Inspection Sheet (R3059B) for the 31041-030-01 can readily be determined by circled discrepant dimensions. Also, before the finished lot of parts is routed to the next operation or storeroom the inspector refers to this sheet as well as sampling the finished lot per the Inspection Procedure. Discrepant lots therefore cannot enter the system.

Preventive Measures:

Each inspector reinstructed, by letter dated 6/25/80, that Pass/Rej. column and Qty column must be properly filled out on every line entry on the Setup and Run Sample Inspection Sheet (R3059B). This letter also included detailed instructions for filling out all other areas of the Setup and Run Sample Inspection Sheet (R3059B).

2. Paragraph III.B.2 states, "Run checks will be conducted as often as possible, consistent with workload and manpower. Samples will be examined and results recorded on R3059".

The Inspection Procedure dated March 4, 1976 for Part Number 31041-087-51 requires conduct of the run check each hour on five consecutive pieces. The Procedures indicates the characteristics to be checked are the same as the setup characteristics which are identified as, (1) rivet contact quality, (2) screw tightening torque, and (3) no gap between the rivet head and terminal.

Contrary to the above:

The run checks had not been run each hour and the screw tightening torque had not been checked during the run checks.

Corrective Action: (Run Checks)

On part 31041-087-51, hourly checks are not necessary. Therefore the requirement for hourly run checks has been removed from the Inspection Procedure. Effective date 6/20/80.

Preventive Measures: (Run Checks)

An evaluation of all inspection procedures has been made to determine the necessity to specify frequency of "Run Checks". The time was removed from those Inspection Procedures which we felt did not warrant a specified frequency. Completion date 7/31/80. Inspectors have been reinstructed by a letter dated 6/25/80, that where frequency of run checks is specified, they must be adhered to.

Corrective Action: (Screw Torque Check)

On part 31041-087-51 the Inspection Procedure called for Screw Torque to be checked. The Sample and Run Sheet observed by the NRC inspector did not indicate a check of Screw Torque. This is a two (2) sequence assembly operation consisting of screw insertion and contact Riveting. This Sample and Run Sheet was for only the contact Riveting sequence. The Screw Torque had been checked on the previous assembly sequence (screw insertion).

The Inspection Procedure contains checks on both sequences. Although clearly understood by the plant inspectors which inspection criteria to use for each assembly sequence the Inspection Procedure has been further clarified by separating the inspection instructions for each assembly sequence. Effective date 6/20/80.

Preventive Measures: (Screw Torque Check)

By letter of 6/26/80, plant inspectors have been instructed to bring to the attention of the inspection supervisors any inspection procedures that cover multiple sequences. These instructions will be similarly separated.

B. Standard Practice Instructions No. 540, M-132, dated February 23, 1976, contains the following requirements:

1. Paragraph III.A.1.b, states in part, "A full-size reproducible drawing is obtained from the Blueprint Room by the issuing engineer and marked up to show the area of deviations. The deviation stamp is affixed and must show: (1) Date issued, (2) Name of issuing engineer."

Contrary to the above:

The name of the issuing engineer had not been shown in the deviation stamp for extension of the deviation on Drawing No. B30011-089, Revision E.

Corrective Action:

Don Bugni issuing engineer of original deviation on 30011-089 Rev. E signed document 6/19/80.

Preventive Measures:

We have examined each of our documents, which are under deviation to insure that they conform to our deviation procedures. Completion date 7/1/80.

Periodic audits of our deviation procedure will be made, and records kept to indicate the results.

2. Paragraph III.A.1.h, states in part, "If the deviation is to be extended, the issuing engineer will apply an additional deviation stamp to the deviated reproducible and show the new expiration date."

Contrary to the above:

The issuing engineer had not applied an additional deviation stamp to the following reproducibles which had had the deviations extended; Drawing Nos.: A31002-027, Revision E; A30017-276-01; and A31085-010, Revision E.

Corrective Action:

Deviation procedure has been revised to conform to actual practice. Under the revised procedure the use of an addirional stamp is the preferred method, however, it is not required if its use would interfere with the information on the document. Completion date 7/7/80.

Preventive Measures:

Periodic audits of our deviation procedure will be made and records kept to indicate the results.

C. Paragraph IV.B., and its subparagraph 6, of Standard Practice Instructions No. 655.1, M-29i, dated May 28, 1980, states in part, "Quality Engineering responsibilities for the Quality Problem Report are as follows:

"Compile and issue to the Quality Manager a weekly Delinquent Report."

"The first part of this Delinquent Report will record the number of problem reports initiated during the month, the number of reports resolved during the month, and the number of problem reports pending."

Contrary to the above:

The weekly Delinquent Reports did not include the number of problem reports initiated and resolved during the month nor the number of problem reports pending.

Corrective Action:

As stated during audit, this portion of the report was dropped due to an evaluation by each department receiving the report indicating they were not using the information.

A re-evaluation the week of 6/23/80 revealed the same, therefore, the reference to number of problem reports initiated, number resolved and number pending has been removed from the SPI.

SPI 655.1, M-29 dated 6/27/80 now states:

6. Compile and issue to the Quality Manager a weekly Delinquent Report. The Delinquent Report will consist of a listing of those reports pending for more than two weeks. The list will include source and date of origin, current location of the report and the date submitted to that discipline. The report will be issued under cover of an inter-office memo identifying the date of issue and containing any comments deemed pertinent by Quality Engineering.

Preventive Measures:

Same as Corrective Action.

D. Standard Practice Instructions No. 510, E-106, dated December 27, 1978, contains the following requirements:

1. Paragraph III.F.1, states in part, "Each item when entered into the control system shall be assigned a control number ('C' number) except items identified with 'F' or 'G' numbers in which case the 'F' or 'G' numbers shall serve as the control number ... This number shall be permanently applied to the item by any practical means which will not damage the item."

   Contrary to the above:

   A control number had not been permanently applied to the Cleco Power Tool Analyzer, Model P-15, Serial No. 007404. The item did exhibit a calibration sticker which indicated that it had been entered in the control system.

   Corrective Action:

   Control number (G-27) was engraved on top of the base on the Cleco Torque Analyzer 6/20/80.

   Preventive Measures:

   Tool and Gauge Inspector was instructed on 6/23/80 that identifying numbers are to be maintained on each item in the calibration program. Further, proper identifying of measuring and test equipment will be checked during subsequent internal Quality Assurance Audits.

2. Paragraph III.G.1 states, "At the time a tool or gauge is entered into the control system a tool and gauge calibration record card is to be initiated."

   Contrary to the above:

   A calibration record card had not been initiated on a Torque Screwdriver, Control No. G-28 or the Cleco Power Tool Analyzer, Model P-15, Serial No. 007404.

   Corrective Action:

   Missing Control Card for Torque Screwdriver G-28 and Cleco Torque Analyzer G-27 have been replaced. Calibration data has been reconstructed from similar equipment known to have been calibrated on the same dates. Cards have been marked as "duplicates with reconstructed data". Completion date 6/19/80.

Preventive Measures:

The Cardex File in which control cards have been stored now is under a lock system. The Tool and Gauge Inspector and the General Supervisor of Inspection have the only keys. Effective date 6/24/80.

By means of a letter dated 6/25/80 the Tool and Gauge Inspector was instructed that the Control Card File must be locked at all times when not in use or when he leaves the Tool and Gauge Room. Also, by means of the same letter the Internal Quality Assurance Auditor has been instructed to include the auditing of Control Cards on his audit checklist.

3. Paragraph III.I.1.b, states in part, "Items that exceed the scheduled recalibration date are to be taken out of service, tagged or segregated to prevent use until recalibrated."

Contrary to the above:

The following items exceeded the scheduled recalibration dates but they had not been taken out of service, tagged or segregated to prevent use: Basic Contactor Tester, Capital Asset No. 81045 (T16-21), recalibration due October 1978; Bench Box, Capital Asset No. 82063, recalibration due November 1978; and Bench Box, Capital Asset No. 82497, recalibration due November 1978.

Corrective Action:

Bench Boxes 82063 and 82497 were calibrated and calibration labels affixed 6/25/80.

Bench Box 81045-T16-21 was also calibrated and calibration sticker affixed 6/25/80

Preventive Measures:

Due to a misunderstanding on responsibility of what department was to calibrate the Bench Boxes they were inadvertently not calibrated. That responsibility has now been clearly defined on all equipment that is used in the acceptance of Product; (A) Mechanical - Tool and Gauge Inspector, (B) Electrical/Electronic - Engineering Electrical Lab. In addition, the auditing of calibration of Bench Boxes will be included in our Internal Quality Assurance Audits checklist.

4. Paragraph III.J.1 states in part, "Each item that has been calibrated shall have a sticker prominently displayed showing the item identification number, date next calibration due, date of last calibration and initials (or stamp) of authorized calibration personnel certifying the calibration." The paragraph also contains provisions for attaching the sticker to the case, container or trimming the sticker for small items.

Contrary to the above:

A calibration sticker had not been displayed on Torque Screwdriver, Control No. G-28; Livermont Analyzer for Powered Screwdriver, Model P-15, Serial No. 95973; or Bench Box, Capital Asset No. 92617. The next calibration due date had not been entered on the calibration sticker for the Cleco Power Tool Analyzer, Model P-15, Serial No. 007404; or Bench Box, Capital Asset No. 82407. Additionally, the following items exhibited calibration stickers which displayed no due date of the next calibration (the particular stickers had no provisions for such information): Digital Multimeter, Serial No. 65641; AC Voltmeters, Capital Asset No. 82116 and Serial No. M2C4576; and AC Seal Current Fixture, Control No. F-14584. These items were calibrated from July 12, 1978 through February 28, 1980.

Corrective Action:

Due to the work area where the two (2) pieces of equipment, G-28 Torque Screwdriver and Livermont Torque Analyzer, are used, it is very difficult to make the calibration stickers adhere. Therefore, the calibration sticker for the G-28 Torque Screwdriver was placed on the case in which we now keep the G-28. On the Livermont Torque Analyzer we placed the calibration sticker on the inside leg of the roll around cart that the Livermout is mounted on. Effective date 6/23/80.

Bench Box 92617 was calibrated and calibration label affixed 6/25/80.

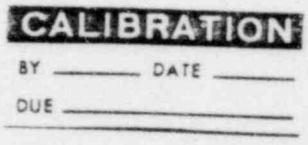
Cleco Torque Analyzer - new calibration sticker with due date placed on the Cleco 6/23/80.

Bench Box 82407 - new calibration sticker with due date placed on 82407 6/25/80.

As of 6/24/80 all Electrical Calibration stickers have been replaced with calibration stickers which provide an area for due date.

OLD

REPLACED WITH



New stickers were placed on equipment mentioned as well as all other Electrical Equipment covered by SPI 510, E-106.

Preventive Measures:

All plant inspectors instructed in a 5-minute meeting conducted by their supervisors, that in cases where they see a calibration sticker falling off or the lack of a calibration sticker on a piece of equipment known to be in the calibration program to notify the Tool and Gauge Inspector immediately. Meeting held 6/25/80.

In addition checks for missing calibration stickers will be added to our Internal Quality Assurance Audits checklist.

During the audit the calibration recall system was not fully explained to the NRC inspector. On all mechanical calibration Raleigh has been using a color code system for due date. That color code system and procedure is as follows:

COLOR CODE

January	Black	July	Dark Blue
February	Orange	August	Brown
March	Dark Green	September	Light Blue
April	Violet	October	Yellow
May	Gray	November	Light Green
June	Red	December	Purple

Color code as above is applied to calibration label at location "DUE" to denote the name of the month when next calibration of the unit is required. Any item bearing a label with that color must be returned to the gauge laboratory immediately for recalibration.

We felt this was a good system but to be in compliance with SPI 510, E-106 and with the Corporate Quality Assurance Manual, we will now show the calibration due date on the calibration sticker in addition to the use of the color code system.

SPI 510, E-106 was revised on 8/22/80 to show the color code system for mechanical calibration and to show that both the color code and the actual due date are to be used.

Due to a misunderstanding on responsibility of what department was to calibrate the Bench Boxes, they were inadvertently not calibrated. That responsibility has now been clearly defined on all equipment that is used in the acceptance of Product; (A) Mechanical - Tool and Gauge Inspector, (B) Electrical/Electronic - Engineering Electric Lab. In addition, the auditing of calibration of Bench Boxes will be included in our Internal Quality Assurance checklist.

All old Electrical Calibration stickers were destroyed 6/25/80 and all reference to them in any plant document has been corrected to show its replacement.

E. Paragraph II of Standard Practice Instructions No. 510, E-106, dated December 27, 1978 states, "All measuring tools, gauges and test equipment used to determine the acceptability of raw materials, parts and products throughout Manufacturing and Quality Control operations are to be controlled and calibrated to provide assurance that they are of the required accuracy and in acceptable operating condition."

Contrary to the above:

The Basic Device Gauging Fixtures, Control No. F10885 and their accompanying gauge blocks, had not been controlled and calibrated to provide assurance that they were of the required accuracy and in acceptable operating condition.

Corrective Action:

F10885 and accompanying calibration blocks were calibrated and logged into calibration program 6/26/80.