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**the kerite company**

October 3, 1980

United States Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 1000  
Arlington, Texas 76011

Attention: Mr. Uldis Potapovs, Chief  
Vendor Inspection Branch

Inspection Report No. 9990228/80-1  
Docket No. 9990228/80-1  
Program No. 51400  
Inspection Conducted: August 19-21, 1980  
Inspector: W. E. Foster, Contractor Inspector  
Vendor Inspection Branch

Gentlemen:

Having reference to Inspection Report No. 990228/80-1 dated September 3, 1980, The Kerite Company makes the following responsive statements.

Notice of Deviation

Deficiency:  
(Par. A)

Operation of the interface controls of Continuous Vulcanizing Lines 1 and 2, had not been prescribed by formal, released, documented instructions, procedures or drawings.

Corrective Action:

Work Instruction, CV-0040, has been written delineating the operation of the interface control system at CV-1 and CV-2.

Preventive Measures:

The Process Engineering Group has been made aware of the importance of providing written instructions for the operation and/or equipment when modifications so warrant.

Dates:

The effectivity dates for the above are September 25, 1980 and October 3, 1980.

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October 3, 1980

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Notice of Deviation - contd.

- Deficiency: Compound QA had not recorded findings of the micro-  
(Par. B) scopic examination each day; however, such  
examinations had been made.
- Corrective Action: Findings of the microscopic examination of the screen  
packs have been entered in the Compound QA log book.
- Preventive Measures: The Chief Chemist has rescinded the requirement for  
grading screen packs by revising Factory Instruction  
No.173. Grading the screen packs was an effort to  
gather data for his own use. He no longer requires  
this information.
- Date: The effectivity date for the above is September 25,  
1980.
- Deficiency: The Recorder Charts reviewed had not been annotated  
(Par. C) as required. Example: None had been initialed by  
the supervisor; some did not reflect the CV Line  
number.
- Corrective Action: The CV Department's Supervisor will sign-off each  
chart and also assure identification of CV line  
number.
- Preventive Measures: CV Department Supervisor was re-instructed and  
re-indoctrinated on importance of strict adherence  
to Work Instruction, CV-0033, requirements.
- Date: The effectivity date for the above is September 22,  
1980.
- Deficiency: A calibration label had not been place on the LC  
(Par. D) Digibridge, GenRad 1688, Serial No. 4212. The Cal-  
2.a ibration Sheet indicated the equipment had been  
calibrated on July 15, 1980.
- 2.b A Micrometer, Mitutoyo-193-211, Serial Number 398,  
had not been recalled for calibration; as evidenced  
by the calibration sheet which indicated that cali-  
bration was due in September 1979.
- Corrective Action:  
2.a A calibration label indicating the date of calibra-  
tion has been placed on the LC Digibridge.
- 2.b The Micrometer, Mitutoyo-193-211, Serial No.398 has  
been recalled and calibrated.

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Notice of Deviation - contd.

Preventive Measures: The Calibration Technician has been reinstructed and re-indoctrinated on the importance of strict adherence to the requirements of the Calibration Manual.  
(Par. D)  
2.a & 2.b

Dates: The effectivity dates for the above are August 19, 1980 and August 21, 1980.

Deficiency: Outside calibration services had not been contacted for the following equipment which displayed calibration label with due date of July, 1980.  
(Par. E)

- a) The Microcon 1 Console of the Instron Physical Tester.
- b) The Honeywell Elektronik 196 Recorder, Serial No. 893131001, on the Mooney Viscometer.

Corrective Action:

- a) The Microcon 1 Console of the Instron Physical Tester has been calibrated by Physical Testing Services.
- b) The Honeywell Elektronik 196 Recorder, Serial No. 893131001, has been calibrated.

Preventive Measures: Outside calibration services are presently being placed under the direction and/or control of one individual, whereas, previously the control was left up to the respective department heads.

Dates: The effectivity dates for the above are July, 1980 and August, 1980.

Deficiency: Measures had not been established to assure that timers had been properly controlled, calibrated or adjusted. The timers, of concern, are used to measure the specified duration of test voltages.  
(Par. F)

Corrective Action: All timers will be calibrated.

Preventive Measures: An Engineering project has been initiated to include timers in the Calibration Manual.

Dates: The effectivity dates for the above are as follows:  
.Calibration of timers - Nov. 1, 1981)  
.Initiating Engineering Project to include timers in Calibration Manual - (Nov. 1, 1980)

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Unresolved Item:

(See Details Section)  
Par. D.3.b

There was no apparent requirement to annotate the charts with: 1) the time of removal from the recorder, 2) the time of completion of the vulcanizing cycle, or 3) the time of inspection by the supervisor.

Corrective Action:

The charts incorporate time of day and are oriented to the correct time when inserted. The supervisor in addition to signing-off will record the date and time of review.

Preventive Measures:

The supervisor has been re-instructed on the use of proper procedures when documenting his review of the charts.

Date:

The effectivity date for the above is August 22, 1980.

Unresolved Item:

(See Details Section)  
Par. E.3.b

The HP7130A Recorder on a Mooney Viscometer (Serial Nos. not apparent) did not display a calibration label; while a Honeywell Recorder on another Mooney Viscometer did display calibration label.

Corrective Action:

The HP7130 Recorder was calibrated with the STL/200 as documented per letter from Physical Testing Equipment Services, Inc. dated September 17, 1980.

Preventive Measures:

Service contracts are currently being negotiated with vendors of calibration services, all equipment requiring calibration will be listed and appropriately documented as to the status of calibration.

Date:

The effectivity date for the above is September 17, 1980.

Sincerely,

J. E. Rogers  
V.P. & General Manager