



**MARVIN ENGINEERING CO., INC.**

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November 27, 1980

UNITED STATES NUCLEAR REGULATORY COMMISSION  
Office of Inspection and Enforcement Region IV  
611 Ryan Plaza Drive Suite 1000  
Arlington, TX 76012

DEC 22 1980

Attention: Mr. Karl V. Seyfrit

Reference: Docket No. 99900388/80-01

Gentlemen:

This is in response to your 26 September 1980 letter and accompanying report, which contained the results of your special inspection conducted by Messrs. I. Barnes and L. E. Ellershaw of your office on August 19-21, 1980 at our facility in Inglewood, California.

We find nothing in the report of a proprietary nature which should be withheld from public disclosure.

The report identifies two (2) deviations from commitment and one (1) unresolved item. The N.R.C. findings with our responses, in the format you requested are enclosed as attachment 1.

Thank you for your cooperation in allowing us an extension to submit our response, should you have any questions concerning our response, we will be pleased to discuss them with you.

Sincerely yours,

Gerald M. Friedman  
Executive Vice President

MARVIN ENGINEERING CO., INC.

GMF: ak

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MARVIN ENGINEERING CO., INC.

INGLEWOOD, CALIFORNIA

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ATTACHMENT 1

Although Marvin Engineering Co., Inc., acknowledges that, "based on the results of an N.R.C. inspection conducted on August 19-21, 1980, it appears that certain . . . activities were not conducted in accordance with NRC requirements as indicated," in your Notice of Deviation, we find, after a thorough review of both completed and active purchase orders, that it only "appears" as such. Further, Marvin Engineering believes that all the findings reported are human errors rather than systems failures.

The following is Notice of Deviation and Marvin Engineering Co., Inc.'s, Response.

1. The MEC corrective action response letter of January 11, 1980, states in part with respect to Item 6 in the Notice of Deviation Inspection Report No. 79-01, ". . . Incoming materials purchased for manufacturing including weld rod, is received, issued a lot ticket, and then determined whether it is acceptable. If acceptable, tagged acceptable, if rejected, tagged rejected. . . ."

Contrary to the above, nuclear welding materials in current fabrication use, which had been determined to be acceptable, were observed to have not been tagged acceptable (See details B.8).

Response: A.1.a

MEC's corrective action response of 11 Jan 80 Item 6 Notice of Deviation Inspection Report No. 79-01 was in error. Response should have stated that incoming material is issued a MEC lot ticket when received; put on hold until found acceptable for use. If weld wire is found acceptable for use, the weld wire container is then marked with MEC's receiving Lot No. The individual weld wire does not have an acceptance tag attached to it, only spool weld wire would have the MEC Lot No. on the body of the weld wire spool after acceptance.

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A.1.b

N.Q.A. Manager, Chief Inspector, Receiving Inspector, Inprocess Inspector, and Shop Supervisors are involved in a continuous monitoring system.

A.1.c

M.E.C. has always maintained control of it's system of receiving and acceptance of weld wire, with the possible exception of an isolated case.

2. The MEC's corrective action response letter of January 11, 1980, states in part with respect to Item 7 in the Notice of Deviation in Inspection Report No. 79-01, ". . . Stop work authority which has always been the responsibility of the inprocess inspectors, has been reiterated and all inspectors have been so notified by Chief Inspector, Jim Richardson. Notification was given on November 15, 1979. . . ."

The MEC's corrective action response letter of March 17, 1980, states in part on this subject, ". . . The Nuclear QA Manager held meetings with the inspectors as to their responsibilities. The discussions held were concerning: (A) Inprocess Inspection, (B) Manufacturing Control, (C) Stop Work Authority. The discussions above were based on M.E.C.'s QA Manual and have been logged (book form) as to time, date, and personnel attending. Each of the participants at the formal meeting signed the attendance log. . . ."

Response: A.2.a

All inspectors attended a meeting based on M.E.C.'s Customer Approved Systems and were logged in the Chief Inspector/Q.A. Manager Nuclear Training and Discussion Logs under the general heading of Q.A. Systems explanation, each entry indicated time, date, and signature of the personnel involved. This included the responsibilities relative to the stop work authority.

A.2.b

M.E.C.'s Chief Inspector and Q.A. Manager's Discussion Logs now documents discussions with all inspectors which specifically address the responsibilities relative to stop work authority.

A.2.c

Discussions completed and entries were logged by 15 Oct 80.

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3. Deviation (Notice of Deviation Item A.3 Inspection Report 79-01).

The MEC corrective action response letter of January 11, 1980, states in part with respect to Item 8 in the Notice of Deviation in the Inspection Report No. 79-01, ". . . Trend reports for 1979 are being prepared and will be complete by February 28, 1980. . ."

Contrary to the above, trend reports for 1979 had not been prepared as of this inspection.

Response: A.3.a

MEC's Nuclear Quality Assurance Manager shall be responsible for Trend Analysis Reports at all times and is maintaining a proper filing system. Trend Analysis Reports were made, but not properly filed.

A.3.b

George Morris, Nuclear Quality Assurance Manager, R. R. Barnack, Nuclear Division Manager, and Gary Kaufman, Production Manager have reconstructed the Trend Analysis Report for 1979.

A.3.c

Review and reconstruction of the 1979 Trend Analysis Reports began September 16, 1980. Completion of reconstructing the Trend Analysis Reports was September 29, 1980. Filing system for Trend Analysis Report, implemented September 16, 1980.

4. Deviation (Notice of Deviation Item A.4 Inspection Report 79-01)

The MEC's corrective action response letter of March 17, 1980, states in part with respect to Item 9 in the Notice of Deviation in Inspection Report No. 79-01, ". . . All inspectors including the Q.A. Manager and Chief Inspector have been cautioned on the use of inspection stamps, and if there are discrepancies to immediately make the Nuclear Q.A. Manager aware of such a discrepancy. The meeting had been held with all inspectors relative to use of inspection stamps (See details, B.11).

Contrary to the above, review of MEC discussions did not indicate that a meeting had been held with all inspectors relative to use of inspection stamps (See details, B.11).

Response: A.4.a

All inspectors have attended a meeting on M.E.C.'s Q.A. Systems regarding the relative use of inspection stamps.

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Response: A.4.a (continued)

Entries were made in Q.A. Managers Nuclear Training and Discussions Log. Each entry indicated time, date, and signature of personnel attending the meetings.

A.4.b

MEC's Nuclear Training and Discussion Logs shall be documented at all times, to show objective evidence of attendance of inspectors for the proper use of inspection stamps.

A.4.c

Implementation and completion on 10/15/80.

5. The MEC's corrective action response letter of January 11, 1980 states in part with respect to Item 15 in the Notice of Deviation in Inspection Report No. 79-01, "All MD's (Manufacturing Orders) are being completely filled out as to procedure and/or revisions to make it a detailed operational information sheet. . . No MD will be released to the shop floor until all of . . . above is accomplished and signed off by the QA Manager and/or Chief Inspector. MD procedure began November 15, 1979."

Contrary to the above, welding procedure specifications for tack welding operation were not specified on the MD's for Feedwater Spargers, S/N's 1, 2, 3, and 4, Job 2480G. These MDs were released for manufacturing on February 6, 1980.

Response: A.5.a

Manufacturing Orders (MOs) for Feedwater Spargers S/N's 1, 2, 3, and 4, for Job 2480G have been corrected to reflect weld procedure for tack welding operations.

A.5.b

No manufacturing orders shall be released to the fabrication shop until all operations on the body of the manufacturing order reflects the proper Procedure Number for that operation. Manufacturing orders shall be reviewed and accepted by N.Q.A. Manager or Chief Inspector and/or Nuclear Program Manager.

A.5.c

Implementation and correction by 27 September 80.



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6. The MEC's corrective action response letter of January 11, 1980 states in part with respect to Item 17 in the Notice of Deviation in Inspection Report No. 79-01, "All MDs have to be released through the planner, dated, signed off, and verified by the Q.A. Department. Inprocess inspectors will ensure that no work is being performed without a proper, approved MD on the floor. . . ."

Contrary to the above four (4) additional MDs (649, 650, 651, and 652) for Feedwater Saprgers, Job No's. 2480F, G, H, and I, respectively were observed to have been completed (all manufacturing work was finished) without having a release date entered on the MDs. In addition, the MD Control Log, maintained by the Planner, did not have release dates entered for these MDs.

Response: A.6.a

The MDs for Job Nos. 2480F, G, H, and I, have been corrected to reflect the actual release dates for MD's 649, 650, 651, and 652, which were derived from Purchase Orders, Inspection records, and MD sign-offs. In addition, the MD Control Log is now complete to show proper release dates for Job Nos. 2480F, G, H, and I.

A.6.b

All present and future Nuclear Jobs shall reflect actual release dates in MD Control Log and that release date shall be entered on MDs. Nuclear Planner shall make the entries, and the Q.A. Manager or Chief Inspector shall verify this by his name or initials on MDs.

A.6.c

Implementation and completion on 15 Sept 80 and completed on 16 Sept 80.

7. The MEC's corrective action response letter of January 11, 1980, states in part with respect to Item 22 in the Notice of Deviation in Inspection Report No. 79-01, ". . .The Chief Inspector maintains the log and performs periodic reviews (monthly) with the help of his inprocess inspector to ensure that the welders have their correct stamps and are using them in a proper fashion for historical documentation. . . ."

Contrary to the above, the log maintained by the Chief Inspector does not show monthly reviews in that the entries showed reviews being performed on 2-15-80, 6-20-80, 7-9-80, and 8-6-80.

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Response: A.7.a

MEC's Welders Check List Stamp Log now reflects documented monthly reviews starting with the date of 11/15/79. Reviews were performed by the Chief Inspector and his designated inprocess inspector but were not initialed or dated to reflect the review.

A.7.b

The Quality Assurance Manager or his designee shall review the Welders Check List Stamp Log monthly. MEC's Q.A. Manager or designee shall initial, stamp the log, and enter the date of review.

A.7.c

Review and implementation of monthly Welders Check List Stamp Log began 15 Sept 80 and was completed 16 Sept 80.

- B. Criterion V of Appendix B to 10 CFR 50 states, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

QA Manual Item 14, paragraph 4.1 states in part, "Any changes to the manufacturing work order shall be made by the planner. . . It shall be initiated, detailed, and released by the planner. . . ." This covers changes prior to the release to manufacturing. Paragraph 5.1 states, "ABSOLUTELY NO CHANGES OR REVISION will be made to any of the manufacturing order, procedures, etc., without concurrence of the Nuclear Program Manager, QA Manager, or Customer (if required per contract)." This covers changes after release to manufacturing.

Contrary to the above, the manufacturing orders (MO) for Feedwater Spargers, Serial Nos. 1, 2, 3, and 4, for Job 2480G, had all been changed by personnel other than the Planner relative to the required revision level for certain Procedures specified on the MO (Liquid Penetrant, Heat Treatment, Pickle and Passivate), and without receiving the concurrence of the QA Manager or Nuclear Division Manager. There was an initial after each change; however, it could not be identified.

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Response: B.1

Manufacturing order changes or revisions for Feedwater Spargers Serial Nos. 1, 2, 3, and 4, for Job 2480G were made by Ken Volkmen of the Nuclear Planning Department. The concurrence of these changes were made by MEC's Quality Assurance Manager on a review basis and planning was stamped and initialed prior to completion of 8-25-80.

B.2

Changes or revisions to manufacturing orders shall be made by the Nuclear Planner only; changes or revisions shall be concurred to the Quality Assurance Manager and/or Nuclear Program Manager, at the time of initiating change or revision. The Quality Assurance Manager, and/or Nuclear Program Manager shall initial and date the change or revision in the body of the manufacturing order where changes or revision are occurring.

B.3

Implementation has been initiated on August 26, 1980.