

AMPHENOL NORTH AMERICA

Bunker Ramo Corporation
9201 Independence Ave. • Chatsworth, California 91311 • 213/341-0710

April 3, 1981

APR 16 1981

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

Attention: Karl V. Seyfrit
Director

Subject: Docket No. 99900116/80-02
Letter dated February 2, 1981

Gentlemen:

Quality Assurance Management has reviewed subject letter, dated February 2, 1981, and the following actions have and will be taken in the future. This information is in addition to Bunker Ramo's response dated December 18, 1980.

1. Response to Notice of Violation: Item "A"

The following steps will be taken effective December 18, 1980 by Quality Assurance Management and the Bunker Ramo SAMS Staff personnel:

"When a defect or deviation is surfaced at Bunker Ramo SAMS which might constitute a substantial safety hazard, a Failure Investigation and Analysis Report (FIAR) shall be initiated. Quality Assurance Engineering and/or Design Engineering will be responsible for initiating the FIAR. Each FIAR will have a serial number. Quality will maintain the FIAR log and the FIAR records.

When the FIAR analysis of the defect and/or deviation indicates that a substantial safety hazard condition exists, the responsible officer, (Bunker Ramo SAMS president) or his designated officer will notify the NRC Regional Office. This notification will be made within two (2) days from the date of his being made aware that the hazardous defect and/or deviation exists. Bunker Ramo SAMS regional office is in San Francisco, area code (415) 943-3700. NRC Regional Office #5, Office of Inspection and Enforcement, 1990 N. California Boulevard, Suite 202, Walnut Creek, California 94596.

Bunker Ramo SAMS responsible officer will follow-up with a written Failure Investigation and Analysis Report to the NRC Regional Office within five (5) days of learning of the defect.

Three (3) copies of each Failure Investigation and Analysis Report shall be submitted to the Director, Office of Inspection and Enforcement.

A cover letter will accompany the Failure Investigation and Analysis Report with: the name and address of the individual or individuals informing the commission; the number and location of all such components in use at, supplied to, or being supplied for one or more facilities or activities subject to 10 CFR Part 21; the corrective action which has been, is being, or will be taken; the name of the individual or organization responsible for the action; and the length of time that has been, or will be taken to complete the action.

A copy of the FIAR will also be forwarded to all customer(s) involved.

Bunker Ramo SAMS responsible officer shall also advise the Bunker Ramo Corporate Law Department in detail of any defect or deviation situations. This notification should be taken as soon as the determination is made that a defect or deviation situation exists, but in any event no later than the time the decision is made to notify the NRC of a possible substantial safety hazard."

2. Response to Item "A" of Notice of Deviation:

Quality Assurance Procedure 3-1, Rev-M, 12/23/80, Para. 4.9 states:

4.9 An "Inactive" storage area shall be maintained for the storage and hold of measuring instruments and electrical testing equipment that are not in current usage.

4.9.1 This equipment shall be maintained in an uncalibrated, unset state in the "Inactive" storage area. The "Inactive" storage area is in the cabinets in the calibration laboratory area. The area of usage is in the fabrication area. Upon request, the equipment shall be calibrated, set and certified. A calibration sticker applied with next due date denoted. The calibration record card shall be updated and the equipment released for use.

Quality Assurance Procedure 3-1, Rev-M, 12/23/80, Para. 4.11 now states:

- 4.11 Measuring instruments and test equipment which have not been used for two successive calibration intervals shall be considered excess to present requirements and automatically transferred into the inactive status. This equipment will be removed from the area of usage and physically placed in the inactive storage area.

The Quality Control Laboratory technicians have been retrained, December 22, 1980, to the above Quality procedures. The Quality Assurance Engineer will audit this area monthly to verify the above controls are enforced. Effectivity date: April 1, 1981.

3. Response to Item "D" of Notice of Deviation:

The Quality Assurance Engineer will audit the module molding area on a monthly cycle to verify that the crimped samples have been submitted for tensile tests. This audit will commence and continue during all nuclear penetration fabrication cycles. All crimpers have been removed from the nuclear manufacturing area. When the nuclear penetration programs are reinstated, all crimpers will be calibrated by the tensile test sample method. The inspectors will police this item on a daily cycle. This will be effective when the penetration activity commences.

4. Response to Item "E" Notice of Deviation:

QAP 2-4, Rev-E, 12/23/80, Para 5.4.2 indicates:

Whenever a hold point is indicated in the Manufacturing Layout, other operations may be accomplished, as long as the following operations will not cover up the operation not inspected. The inspection operations must be accomplished prior to moving the material/process out of that department. The MIT inspection operations must be stamped off prior to moving the material out of the department. The QAE may authorize a bypass on inspection/test operations and the I.E. may authorize a by-pass on manufacturing operation in accordance with the above criteria.

The Quality Assurance Engineer and Industrial Engineer, will approve all by-passes as indicated above on all future by-pass requests. Effectivity: When nuclear penetration manufacturing activity is reinstated.

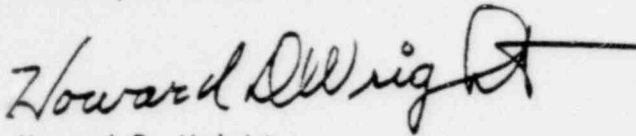
5. Documents 10 CFR Part 21, Quality Assurance Procedure (QAP) 10 CFR 21 and Section 206 of the Energy Reorganization Act of 1974 is posted and a monthly check is in process.
6. Bunker Ramo SAMS Quality records indicate that the Nuclear Quality Assurance Manual (QAM) -01 has been sent to Mr. Ray Agee. He confirms that it is on file in your office.

7. Your understanding and Bunker Ramo SAMS's Quality understanding is the same.

If you have any questions regarding the contents of this letter, please contact the undersigned.

Sincerely,

BUNKER RAMO CORPORATION
Amphenol North America Division
SAMS Operations

A handwritten signature in cursive script that reads "Howard D. Wright". The signature is written in black ink and includes a long horizontal stroke at the end.

Howard D. Wright
Quality Assurance Manager

HDW/clg