

**Transamerica
Delaval**



Transamerica Delaval Inc.
Engine and Compressor Division
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February 10, 1981

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

Attention: Uldis Potapovs, Chief
Vendor Inspection Branch

Re: Docket No. 99900334/80-01

Dear Sir:

Enclosed please find Transamerica Delavals' written responses to the Commissions' Notice of Violation and Notice of Deviation which resulted from the Q.A. Program inspection conducted by Mr. W.E. Foster on October 14-17, 1980 at Transamerica Delavals' Oakland, California facility.

Sincerely,

R.E. Boyer
R.E. Boyer
Quality Assurance Manager

Transamerica Delaval Inc.
Engine and Compressor Division

REB/dc

Enc;

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TRANSAMERICA DELAVAL STATEMENT OF ACTION TO:
NOTICE OF VIOLATION

VIOLATION IDENTIFIED: Records had not been maintained with respect to fractured thermostatic valves in Grand Gulf Unit 1 emergency diesel generators to indicate that:

1. An evaluation had been conducted in accordance with 10CFR Part 21 requirements.
2. Actions had been taken to identify whether the product deviations contributing to the valve fractures, i.e. improper use of raised face flanges in connecting piping was present in equipment supplied to other customers.

CORRECTIVE ACTION: A complete evaluation has been conducted for Grand Gulf and all identical thermostatic control valves furnished to sites by Transamerica Delaval to determine if the defined deviation was present in equipment supplied other customers. Records of the evaluation are now maintained in a 10CFR Part 21 report file maintained by the Quality Assurance Manager.

The three (3) sites which could have had the same problem as Grand Gulf were Long Island Lighting, Shoreham Station; Southern California Edison, San Onofre; and TVA, Bellefonte.

At Long Island Lighting it was determined that a different manufacturers valve was used and the potential problem did not exist. At TVA Bellefonte flat face flanges were specified and installed. At San Onofre one of the valve connecting flanges is a raised face flange. Calculations were made indicating that the stress resulting from a raised face flange mating with a flat face flange was well below acceptable allowable stress. The stress resulting from this assembly is 4015 PSI when using the torque recommended in our instruction manual. The yield stress for the thermostatic valve material is 40,000 PSI. This reinforces our contention that the original failure was not a result of the flange problem, but abnormal stresses imposed during assembly by site erection personnel.

PREVENTIVE MEASURES: Transamerica Delaval has implemented a formal 10CFR21 Division Policy for the assignment of responsibility for evaluation, documentation and notification of potential defects in equipment subject to 10CFR Part 21.

COMPLETION DATE: February 10, 1981

TRANSAMERICA DELAVAL STATEMENT OF ACTION TO:

NOTICE OF DEVIATION:

- A. FINDING: Gage used to measure the diameter and depth of the link rod dowel counterbore had not been identified with:
1. A tool and/or Gage Tryout Tag;
 2. A calibration decal; or
 3. Company name, gage or equipment name, part and/or serial number as applicable; gage had been in use since February 1980.

CORRECTIVE ACTION: The link rod dowel gage has been identified and entered into Transamerica Delaval's Metrology Lab system as required by the Q.C. Manual and Quality Control Procedure IP-100, calibration.

PREVENTIVE MEASURES: Implementation of the requirements of the Quality Control Manual for new tools and gages regardless of the source of the tool or gage.

COMPLETION DATE: December 16, 1980

- B. FINDING: Quality Engineering did not process a Corrective Action Request Form with respect to customer identified Transamerica Delaval failures to meet quality contract requirements in ASME Section III, Class 3, piping.

CORRECTIVE ACTION: Quality Engineering now processes Corrective Action Request for internal and external failures to meet contract requirements. Specifically for the WPPSS 1/4 Welding problem, Quality Engineering conducted a meeting on April 6, 1979 for all personnel involved with the WPPSS welding. The meeting addressed the problem in terms of cause and solution and was considered to supercede the issuance of a Corrective Action Request. The memo scheduling the meeting and the agenda of the meeting were presented during the October 14-17 inspection.

PREVENTIVE MEASURES: For all internal and external failures, Corrective Action Requests are issued to the department/personnel responsible. The activity of Corrective Action Requests is reported to the Division General Manager by the Quality Assurance Manager.

COMPLETION DATE: November 30, 1980

- C. FINDING: Transamerica Delavals' written practice IP-600 did not describe the procedure used for examination of Level III NDE personnel. Personnel performing inspection per ASME Section III, Subsection ND and NF had not been qualified by examinations of comparable standards and methods referenced in SNT-TC-1A.

CORRECTIVE ACTION: Transamerica Delaval will revise procedure IP-600 to better define the procedure used for examination of NDE Level III personnel. Weld Inspectors performing visual examination for ASME Section III, Subsections ND and NF fabrications shall be qualified by examination comparable to those referenced in SNT-TC-1A.

PREVENTIVE MEASURES: Implementation of training in visual examination for inspectors. Verification and review of training record through the Internal Audit program.

COMPLETION DATE: April 30, 1981

- D. FINDING:
1. SMAW welding of 6 inch pipe observed being performed in the 3G position, welder had been qualified for 1G position only.
 2. SMAW welding was identified to have been performed on a 2 inch ASME Section III, Class 3 piping assembly by a welder who had been qualified per ASME Section IX for pipe diameters of 2-7/8 inch and over.

CORRECTIVE ACTION: Welders have been recertified on small diameter pipe, 2-7/8 inch and under in the 6G position. All existing welder certifications were reviewed for compliance to ASME Section IX for correctness of essential variables.

PREVENTIVE MEASURES: A committee has been formed to review and implement the Welder Certification/qualifications in accordance with ASME Section IX, and the Quality Assurance Manual and procedures.

COMPLETION DATE: December 30, 1980

- E. FINDING: Unused weld rod was not being returned to the storage area within four hours of issuance.

CORRECTIVE ACTION: A Corrective Action Request was issued to the Fabrication Shop Supervisor requiring that the weld rod control program be implemented as stated in the Quality Assurance Manual and procedures. The program requirements were reviewed with all welders to re-inforce their responsibility to comply with the Weld Rod Control Procedures.

PREVENTIVE MEASURES: Verification of implementation of Corrective Action through the Internal Audit Program.

COMPLETION DATE: December 1, 1980

- F. FINDING: Verification of the use of certain welders could not be accomplished in that welding was observed being performed by a different welder than the individual identified on the Route Sheet. Welding records were not provided in that Weld Reports had not been prepared for the operations observed.

CORRECTIVE ACTION: A Corrective Action Request was issued to the Weld Shop Supervisor requiring that welders be instructed to sign the Route Sheet prior to welding and that all individuals performing welding on a pipe spool must be identified on the Route Sheet. Route Sheets now identify the welder assigned, date, procedure being used and electrode heat number. Weld reports as referenced in procedures are accomplished after completion of all operations on the Route Sheet. Weld Reports are utilized to compile information from Route Sheets in a uniform manner and itemize information from Route Sheets.

PREVENTIVE MEASURES: Route Sheets will be revised to allow all welders performing welding to be identified. Verification of compliance to IP-500 and related procedures to be verified by Internal Audit and follow-up on Corrective Action Request.

COMPLETION DATE: November 30, 1980 All welders identified on Route Sheets. Revised Route Sheets implementation to be complete June 30, 1981.

- G. FINDING: A defective weld was removed and replaced without rejection and documentation on an Inspection Report. Disposition was made by Quality Control Supervision of a dimensional nonconformance without submission of the Inspection Report to the Material Review Board for review.

CORRECTIVE ACTION: A Corrective Action Request has been issued to the Q.C. Supervisor requiring that all defective welds be put on a Inspection Report and that all Inspection Reports on ASME Fabrication be submitted to the Material Review Board. In addition, a ASME Fabrication Rework Record has been developed and implemented to better document any rework on a ASME fabrication.

PREVENTIVE MEASURES: Complete implementation of Quality Control Procedure IP-500. Implementation of ASME Rework Record Form and verification of the program implementation through the Internal Audit program.

COMPLETION DATE: January 2, 1981

- H. FINDING: Weld was observed to contain an area with less than a required 1/4 inch fillet resulting from a fit-up condition.

CORRECTIVE ACTION: The welds observed had not been final accepted by a weld Inspector although initial NDE had been accomplished. Welds in question were documented on an Inspection Report for MRB Review, disposition and rework. Final acceptance of welds must be by a Weld Inspector, not the NDE Technician assigned to perform any Magnetic Particle or Liquid Penetrant Testing.

PREVENTIVE MEASURES: A Corrective Action Request was issued to the Q.C. Supervisor requiring that Weld Inspectors be instructed in the requirements of IP-500 and that they specifically stamp and date all

items accepted on Route Sheet operations. Additionally, Weld Inspectors have been scheduled for training in Weld Inspection and have been given eye examinations.

COMPLETION DATE: December 1, 1980 for correction of undersized fillet welds. April 30, 1981 for training of Weld Inspectors.

- I. FINDING: Inspection acceptance stamps had not been entered for operations on the Production Route Sheet, nor had Inspection Reports been prepared to denote a rejected condition after inspection.

CORRECTIVE ACTION: By issuance of a Corrective Action Request Inspectors have been instructed to stamp and date all accepted operations on Production Routing Sheets at the time of acceptance. Items not acceptable after inspection are documented on an Inspection Report and submitted to the Material Review Board for disposition.

PREVENTIVE MEASURES: Implementation of Quality Control Procedure IP-500, specifically, Section 4 to be verified by follow-up of Corrective Action Request and Internal Audit.

COMPLETION DATE: December 10, 1980