

APR 20 1981

April 16, 1981

Mr. Uldis Potapovs, Chief  
Vendor Inspection Branch  
US Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Region IV  
611 Ryan Plaza Drive, Suite 1000  
Arlington, Texas 76011

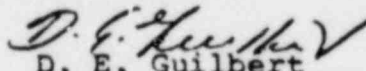
Dear Mr. Potapovs:

The attached report contains our responses to the Notice of Nonconformances and Unresolved Item identified in NRC Inspection Report 99900400/81-01.

We have reviewed both the NRC Inspection Report, and our responses, and find that neither includes information that is considered proprietary.

Should you have any questions concerning our reply, we will be pleased to discuss them with you.

Sincerely,



D. E. Guilbert  
Vice President and General Manager  
NUCLEAR POWER GENERATION DIVISION

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1. Nonconformance A

B&W procedure NPG-0412-63 is applicable to the Nuclear Service Department and the Quality Assurance Department. Sections I and VI.F of this procedure require that all markups to technical documents, such as reports and other non-graphical information relating to the design, manufacture, procurement, test, inspection and operation of products or services provided by NPGD, shall indicate the date of the markup and the initials of the person marking the document.

Contrary to the above, the B&W Certificate of Conformance and the B&W Quality Assurance Data Package review/approval sheet (serial number 23-1103635-00) for 251 control rod drive mechanism hold-down bolt assemblies were marked up without the required date of the markup nor the initials of the person marking the document.

B&W-NPGD Response

Corrective Action

QA Data Package 23-1103635-00 was originally issued on September 24, 1979. The 251 holddown bolt assemblies represented by this package were placed in inventory in the NPGD Nuclear Parts Distribution Center. However, at that time, the capability of these assemblies to comply with customer requirements had only been evaluated for Metropolitan Edison. Consequently, the QA Data Package referenced NPGD contract number 788-264165 (Metropolitan Edison) and these assemblies could only be used to fill orders from Metropolitan Edison. Subsequently, an evaluation was made against the requirements of other customers, and Procurement Authorization 83-765949-00 was issued on April 18, 1980, to transfer these holddown bolt assemblies from contract 788-264165 to inventory folio number 788-325206 thereby allowing these assemblies to be used to fill orders for various customers. This Procurement Authorization also requested that QA Data Package 23-1103635-00 be revised to reflect this transfer.

QA Data Package 23-1103635-00 was retrieved from the NPGD Records Center and marked up to reflect the necessary changes. The intent of the individual who marked up the package was to issue a revised package. However, the marked up package was inadvertently returned to the NPGD Records Center without the package being formally revised.

This QA Data Package has now been properly revised and re-issued as 23-1103635-01.

B&W - NPGD RESPONSE TO NRC INSPECTION  
REPORT NO. 999004C0/81-01

1. Nonconformance A (Cont'd)

Corrective Action (Cont'd)

This error occurred in April, 1980. An internal audit of spare and replacement part QA Data Packages was conducted in November, 1980. This audit covered QA Data Packages processed between September, 1979 and November, 1980 and no instances of package markups were detected. In addition, spot checks were made of other QA Data Packages processed by the individual responsible for the markup of QA Data Package 23-1103635-00 and no further instances were detected. Further discussion with this individual and other individuals involved in the processing of QA Data Packages indicate that they are well aware of the requirements that revisions to QA Data Packages cannot be made by markups but rather must be made by formal revision of the package.

Preventative Measures

Based on the above discussion the markup of QA Data Package 23-1103635-00 is considered to be an isolated incident and no preventative measures are necessary.

2. Nonconformance B

Section No. 17 of the Quality Assurance Manual 19A-N.1 and Criterion XVII of Appendix B to 10 CFR Part 50 respectively state in part:

" . . . Records are collected during design and procurement to furnish documentary evidence of the quality of items and of activities affecting quality. . . The records are maintained and identified in accordance with the Records Management Manual (NPGD Records Retention Schedules and File Reference Manual 1E1)  
 . . . "

" . . . Sufficient records shall be maintained to furnish evidence of activities affecting quality. . . The records shall also include closely-related data such as qualifications of personnel,  
 . . . "

Contrary to the above, personnel records which furnish documentary evidence of the qualifications of personnel performing activities affecting quality were not collected nor maintained in accordance with the Records Management Manual.

Specific examples of the above nonconformance are as follows:

- a. Existing procedures do not require documented evidence of education and experience verification of new employees performing quality related work to serve as the basis for qualification of personnel, furthermore, half of the examined sample of 12 employees hired after 1977 contained no objective documented evidence to verify education and/or experience.

2. Nonconformance B (Cont'd)

- b. Certain of the examined sample of employees hired after 1977 either contained no Employment Procedure Record or contained an Employment Procedure Record that was not completed although Employment Procedure 1406-A2 requires that a completed Employment Procedure Record be included in the personnel record file.
- c. No objective evidence was available to confirm that Individual Personnel Jacket records were being microfilmed and stored for present employees as required by the table on Personnel Records in NPGD Records Retention Schedules and File References Manual 1E1.

B&W-NPGD Response

Corrective Action

A new NPGD administrative procedure NPG-1406-10G, "Verification of Previous Employment and Education", will be issued by May 1, 1981. This procedure will require documented evidence of employment and education verification for professional employees hired after May 1, 1981.

The 1E1 Manual will be revised by May 1, 1981 to require the following:

- a. Individual Personnel Jackets for active employees will be maintained in locked file cabinets in Personnel.
- b. Individual Personnel Jackets for terminated employees will be retained in Personnel for approximately one year after termination and then sent to the Records Center for micro-filming. The microfilms will then be sent to Personnel for retention. The original jackets will be retained in the inactive Records Center for an additional two years before being destroyed.
- c. Personnel Qualification Records (work experience, education and verification of work experience and education) for professional employees hired after May 1, 1981 will be retained on microfilm in the Records Center. The original material will be maintained in Personnel.
- d. Security copies of qualification records will be maintained in a remote security facility.

2. Nonconformance B (Cont'd)

Preventative Measures

Personnel Qualification Records will be included in the NPGD QA internal audit program and audited on an annual basis.

3. Nonconformance C

Section No. 2 of the Quality Assurance Manual 19A-N.1 states in part, "The QAP (Quality Assurance Program) shall take into account the prerequisites for achieving quality, such as . . . indoctrination and training of personnel performing activities that affect quality, . . ."

Individual managers provide training for personnel under their direction in accordance with NPG 1702-22, Training of NPG Employees. Records are maintained by the personnel department that document the indoctrination and training received by personnel to the requirements of the QAP.

Contrary to the above, records documenting the indoctrination and training received by personnel performing activities that affect quality were not maintained by the personnel department in accordance with procedure NPG-1702-22.

Specific examples of the above nonconformance are as follows:

- a. The Personnel Training Record form (required by NPG 1702-22) was not used to document new employee orientation.
- b. Half of the examined sample of employees, hired after 1979, had not received formal group orientation (by Personnel and Quality Assurance) within 6 months after the start of employment as required by NPG-1702-22.
- c. Half of the examined sample of employees, hired after 1979, had not received initial job training (by the manager of the employee) within 90 days of the date that the employees joined the organization as required by NPG-1702-22.

B&W-NPGD Response

Corrective Action

The Personnel Training Record form is now being used to document new employee orientation. NPGD Personnel and QA are now current with the requirement that this orientation be completed within six months after the start of employment.

3. Nonconformance C (Cont'd)

Corrective Action (Cont'd)

An eighty day follow-up system has been instituted within Personnel to assure that the initial job training required by NPG-1702-22 takes place within ninety days of the date that an employee joins an organization.

Preventative Measures

Personnel training records will be included in the NPGD QA internal audit program and audited on an annual basis.

4. Unresolved Item

It could not be determined if the quality assurance program requirements imposed by B&W on suppliers of spare and replacement parts meet current NRC requirements.

B&W-NPGD Response

The only current NRC requirements known to NPGD for the procurement of spare and replacement parts are those of Regulatory Guide 1.33. This regulatory guide endorses ANSI 18.7 and section 5.2.13 of ANSI 18.7 allows procurement of spare and replacement parts to requirements (both technical and quality assurance) at least equivalent to those for the original equipment orders. NPGD is in compliance with the requirements of this regulatory guide and NPGD believes that it is adequate to assure the quality of safety related spare or replacement parts.