

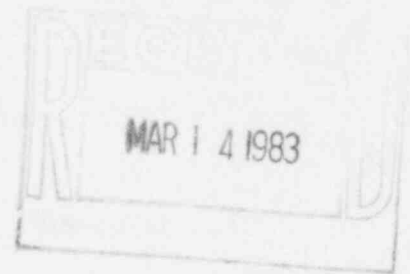


Brown Boveri Electric, Inc.

Manufacturer of I-T-E Electrical Power Equipment

March 9, 1983

Docket No. 99900743/82-01



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

Attention: Mr. Uldis Potapovs, Chief
Vendor Program Branch

Gentlemen:

This letter is in response to your letter of February 15, 1983 which requested confirmation or correction of information with respect to BBE responses and action concerning the Notice of Nonconformance listed in your letter dated December 2, 1982.

Your letter indicates no further questions at this time concerning BBE responses to Items A & B of the Notice of Nonconformance.

With respect to Item D, BBE is in the process of completing a Quality Assurance Procedure which defines the steps to be taken to implement modification of relays or other devices returned from the field. This procedure will list alternatives that may be used for different types of modifications. A draft of this procedure is currently being circulated for review prior to its being issued during the month of March, 1983.

With respect to Item E, we are enclosing a copy of an internal BBE letter dated February 2, 1983 which reminds the applicable QA personnel to review all of their procedures for conformance to actual shop practices.

Your letter further indicated that it does not appear that BBE has appropriately responded to Item C of the Notice of Conformance in as much as records of in-process inspection are not addressed.

The operation performed after wave soldering wherein the printed circuit boards are checked for excess or deficient solder, and corrected, cannot technically be classified as in-process inspection, since this work is performed by manufacturing assembly personnel. The fact that the person performing this work stamps the board is considered to be similar to the welding stamps used by some manufacturers to identify the person responsible for the work. The official inspection and test of these products is performed at the time of final test. QAP 10.9H has been revised to reflect actual shop practices, and all reference to in-process inspection has been eliminated.

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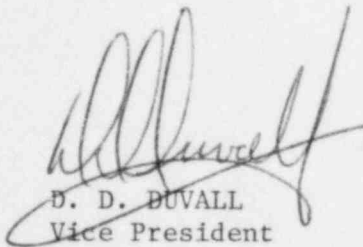
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In the assembly process of electronic components, such as the relays manufactured at our Horsham Operation, it is quite common to have assembly personnel to perform self-verification checks that the work has been performed correctly. These checks are not classified as inspections, and therefore inspection records are not maintained.

In accordance with our union contract, an assembler cannot perform an inspection and likewise, an inspector cannot perform rework.

A handwritten signature in dark ink, appearing to read "D. D. Duvall", is written over the typed name and title.

D. D. DUVALL
Vice President

DDD/jm

Enclosure

cc: R. A. Conrad
D. Dalasta
W. E. Laubach
E. W. Rhoads

Inter-Office Memo

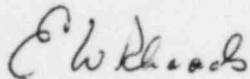
To *Distribution List From E. W. Rhoads Dept./Div. Engineering
Date February 2, 1983 Location Spring House
Subject REVIEW OF PROCEDURES Copies to W. E. Laubach
F. E. Novak
J. F. Silerio

* R. Conrad - Horsham
J. Cooper - Columbia
J. Cosgrove - Chalfont
M. Franchi - Chalfont
R. Liggins - Sanford
T. Nunn - Bland
J. Pirolli - Woodruff
D. Pratt - S.H.
D. Purkey - Tulsa
J. Untener - Florence

During a recent inspection by the NRC, we were cited for a nonconformance because some of our documented procedures did not agree with the current shop practices.

Considering the recent personnel reductions and organizational changes, a review should be made of QA procedures to determine that these reflect current shop practices.

This review of procedures should preclude a recurrence of this type of nonconformance. Procedures that do not reflect current practices should be revised accordingly.



E. W. RHOADS

EWR/jm

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Certified By

