PA-81-027

Westinghouse Electric Corporation Power Systems

Nuclear Fuel Division

Box 355
Pittsburgh Pennsylvania 15230

July 22, 1981

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

Attention: Uldis Potapovs, Chief
Vendor Inspection Branch

Gentlemen:

REFERENCE: Inspection Report No. 99900005/81-02

This is in response to your letter of June 26, 1981, concerning the report of the inspection conducted from May 4-7, 1981, at the Westinghouse Nuclear Fuel Division Manufacturing Plant in Columbia, South Carolina.

The enclosed Attachment I, "Response to Notice of Nonconformance," contains our response to the specific findings of the inspection as contained in the above referenced inspection report.

We have reviewed the referenced report and find that it contains no information which we consider proprietary in nature.

Should you have any questions concerning this letter, we would be pleased to discuss them with you.

Sincerely,

WESTINGHOUSE ELECTRIC CORPORATION

H. L. Russo, Manager
Product Assurance Department
Nuclear Fuel Division

HLR:ds
Attachment

ATTACHMENT I

RESPONSE TO NOTICE OF NONCONFORMANCE

The following contains the detailed responses to the deviations noted in U.S. NRC Inspection Report 99900005/81-02.

I. Notice of Nonconformance

Section 5 of the Westinghouse, Nuclear Fuel Division, Quality Assurance Program Plan, WCAP-7800, Revision 5A, states in part:

> "Throughout the design, manufacturing, and inspection phases, the activities and operations effecting the quality of the fuel assemblies and core components are controlled through the use of approved drawings, specifications, instructions, and procedures."

Nonconformances with these requirements are as follows:

Operating Procedure 711001, Plate Strap, Section, Plate Strap, Part 01, required plating voltage to be 2.0 to 4.0 volts.

Contrary to the above, a plating voltage of 4.3 volts was observed in use in the plating room on May 6, 1981.

Westinghouse NFD Response

Westinghouse NFD concurs with the inspector's observation that plating voltage was 4.3 volts. It should be noted that the key process parameter, amperage, was within proper limits as defined by the operating procedures and therefore platings were being produced which met specification requirements.

The operating procedure was revised to reflect the importance of amperage and to identify voltage limits for reference only. This revision was issued on May 12, 1981.

Operators have been reinstructed regarding the importance of following Operating Procedures.

Routine surveillance by supervision will assure future operator compliance with procedures. In addition, continued compliance will be monitored and verified during internal audits.

II. Notice of Nonconformance

Quality Assurance Program Plan, WCAP-7800, Revision 5A, Section 5, states in part:

> "Drawings, specifications, instructions, and procedures define appropriate acceptance criteria for materials, parts, and assemblies and applicable parametric limits for processes and test methods, with respect to dimensions, tolerances, operating limits, and quality standards."

Contrary to the above, the Quality Control Instructions QCI 934001 and Operating Procedure 711001, did not have the appropriate acceptance criteria and applicable parametric limits as defined by the Process Specification 595221.

Westinghouse NFD Response

Process Specification NPS 595221 was revised to clarify acceptance test sample requirements. Revision 13 of Operating Procedure 711001 revised (Step 14) to direct obtaining acceptance samples in line with the requirements of the revised Process Specification. In addition, the sample requirements of the revised Process Specification were incorporated in Revision 11A of Quality Control Instruction 934001. With these revisions, all documents are in agreement with regard to acceptance criteria. These revisions were implemented on May 12, 1981.

Process Specification NPS 595221 was also revised to provide recommended parametric guidelines for solution compositions and current density. With this revision, Operating Procedure limits are in agreement with Process Specification requirements. As noted by the inspector, these changes were initiated during the inspection and have since been implemented.

III. Notice of Nonconformance

The Quality Control Manual, QCOP 9.1, Revision 5, identifies the heat treatment of top nozzle springs as a specific process to be qualified. Contrary to the above, there was insufficient documentation available to show that the procedure currently used had been qualified.

Westinghouse NFD Response

The qualification file reviewed was unique in that it concerned a heat treatment which is an Industry Standard for the material being treated. The Process Specification calls out the Industry Standard for time/temperature conditions to be used, thus negating the requirement that a parametric range be evaluated. The information contained in this package was intended to demonstrate equipment capabilities with regard to providing conditions identified in the Process Specification.

III. (Continued)

Qualification reports for all special processes will be reviewed to assure that sufficient information is included to demonstrate qualification. Where appropriate, parametric ranges will be identified. This effort will be completed by October 1, 1981.

The requirement for requalification of processes has been and will continue to be controlled through Quality Control Engineering review and approval of Manufacturing Operating Procedures.

IV. Notice of Nonconformance

Quality Control Instruction, Tool and Gage Control, QCI 000140, Revision 9, requires Maintenance Calibration to have the dates of calibration on card files.

Contrary to the above, one of the two Maintenance Calibration cards inspected failed to record calibration that was performed on October 22, 1980. It was also noted that the last entry on the card file was misdated. The card file in question was for a Torr Gage used on the helium leak detector, Unit B. The card in question was corrected before the end of this inspection.

Westinghouse NFD Response

As noted by the inspector, the card in question was corrected during the inspection. However, in addition, Maintenance Instrument Technicians have been reinstructed to be more accurate in record-keeping for all phases of the calibration program. Also, an audit of approximately forty other calibration cards was conducted by Maintenance supervision and management and no other problems were found.

Further surveillance of the Maintenance Calibration Program will be maintained during future internal audits.