



GENERAL ATOMIC

GENERAL ATOMIC COMPANY
P.O. BOX 81608
SAN DIEGO, CALIFORNIA 92138
(714) 455-3000

October 26, 1981

Ref: Docket 99900004/81-C

Mr. Uldis Potapovs
Chief, Vendor Inspection Branch
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Dear Mr. Potapovs:

This is in response to your report of four (4) nonconformances identified during your Mr. McNeill's inspection of our QA Program on August 24-28, 1981. The attached detailed response is organized to correspond to your Summary, and we believe it to be self-explanatory. Should you have any questions or require further clarification, kindly contact our Mr. T. R. Colandrea at (714) 455-4570.

Sincerely,

D. van Hilten
Executive Vice President

Attachment

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ATTACHMENT A

NONCONFORMANCE A

"General Atomic Procedure PSC Thorium Premix, FPD-203, Revision D, Section 5.5.11.(b) states:

"If the results from these samples is not between_____ and_____ carbon, hold the product, advise shift supervisor, and send all samples from other bottles to the QC lab for analysis. Record results on run sheet."

Contrary to the above, a fertile mix lot CT-1-40017, one of four inspected was found that was below the procedure and specification limits. This lot had not been placed on hold, the shift supervisor had not been advised and additional samples had not been sent to the QC lab. An erroneous within limits carbon result was recorded on the run sheet."

CORRECTIVE ACTION A

Action to Correct Reported Items

The Run Sheet was corrected with the proper value after a thorough investigation. It was determined that the product integrity was not jeopardized by the erroneous entry.

Action to Prevent Recurrence

The operator has been reminded to record values correctly.

Date Actions will be Complete

Action to Correct Report Item - Completed (8/26/81)
Action to Prevent Recurrence - Completed (8/26/81)

NONCONFORMANCE B

"General Atomic Quality Assurance Manual, dated March 2, 1981, Section 18, paragraph 4.2, states in part:

". . . . each element of the GA QA program shall be audited at least once each year."

Contrary to the above, one of the two special processes used in fuel operations, BAF measurements, was not audited in 1980 and 1981. The other special process, heat treatment of fuel rods, was not audited in 1981. Evidence suggests that BAF measurements were being done during both audit periods."

CORRECTIVE ACTION B

Action to Correct Reported Items

An audit of Special Processes, including BAF measurements and Heat Treating, was subsequently performed. There were no adverse findings.

Action to Prevent Recurrence

The audit element, Control of Special Processes, was erroneously deleted from the original scope by the auditor on the basis that the entire segment of fuel had already been manufactured (and packaged) at the start of the audit and that special processes were therefore not active as an audit item. All future audits will adhere to the preplanned scope unless there is management/supervisory approval for deletions.

Dates Actions Will be Complete

Action to Correct Reported Items - Completed (10/19/81)
Action to Prevent Recurrence - Completed (8/28/81)

NONCONFORMANCE C

"General Atomic Procedure Auditor Qualification, QDI-18-2, Revision C, Section 4.2.6, states in part:

'The candidate shall achieve a passing score on the GA Lead Auditor Examination or shall satisfactorily accomplish a 'practical examination' by performing a demonstration audit.'

Contrary to the above, records of the two lead auditors sampled contained no evidence that the above requirement had been satisfied. There was no record available of 'practical examination' as defined by the procedure. Both auditors had passed examinations other than the GA Lead Auditor Examination, however, there was no evidence of approval of a substitution of these examinations for the GA Lead Auditor Examination."

CORRECTIVE ACTION C

Action to Correct Reported Items

Both Lead Auditors satisfactorily completed separate demonstration audits subsequent to the NRC inspection.

Action to Prevent Recurrence

Prior to October 9, 1978 the certifications were based on, among other requirements, a successful completion of a written examination in accordance with rules at that time. After October 9, 1978 the specific requirement of "written examination" was

amended to read "GA Lead Auditor Examination." This change (Rev. B to QDI 18-2) did not require retrofitting to the new requirement and therefore, the original certifications remain in effect. A change to QDI 18-2 will be made, however, to address the substitution of other acceptable examinations for the GA Lead Auditor Examination.

Dates Action Will be Completed

Action to Correct Reported Items - Completed (10/27/81)
Action to Prevent Recurrence - November 13, 1981

NONCONFORMANCE D

"General Atomic procedure Material Tagging (Fuels) - Accept, Hold, Reject, QDI-23-11, Revision C, Section 5.1.2 states in part:

'Nonconforming material will be tagged REJECT after the material has been evaluated and found to be a nonconforming item.'

Contrary to the above, two of three bottles of nonconforming recycle mix material were found to be not tagged. The bottles were identified SW 90-30121-P2/21 and SW 90-30127-P1. The third bottle was tagged with a Notice of Discrepancy (NOD) tag and a Nonconformance Report (NR) No. 3498. The nonconformance was documented on NRs 3707 and 3708."

CORRECTIVE ACTION D

Action to Correct Reported Items

The Material Review Board evaluated and dispositioned NR 3707 and 3708; the material was determined to be acceptable for use as is. The reference to NR 3498 on the NOD tag was due to a clerical error.

Action to Prevent Recurrence

The intent of QDI-23-11 was to apply the REJECT tag to material which had been found to be nonconforming, itemized on a Nonconformance Report AND dispositioned as rejected material. However, as written, the wording does imply that a REJECT tag will be applied to all nonconforming material. QDI-23-11 is being changed to be more explicit in its intent.

The use of NOD tags has been discontinued; a procedure change is not required.

Dates Action will be Completed

Action to Correct Reported Item - Completed (9/21/81)
Action to Prevent Recurrence - November 30, 1981