

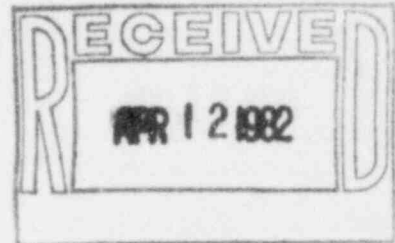
Flow Control Division
1900 South Saunders Street
Raleigh, North Carolina 27603
(919) 832-0525



Rockwell
International

April 6, 1982

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



Attention: Mr. Uldis Potapovs, Chief
Vendor Inspection Branch

Subject: Docket No. 99900058/82-01
Response to Inspection conducted
February 8-11, 1982

References:

- (1) USNRC (Uldis Potapovs) letter to Rockwell International (J. V. Grasso), Docket No. 99900058/82-01, dated March 23, 1982
- (2) Rockwell International (J. V. Grasso) letter USNRC (Uldis Potapovs), Subject: Docket No. 99900058/81-02, Response to Inspection conducted August 10-14, 1981, dated February 16, 1982
- (3) USNRC (Uldis Potapovs) letter to Rockwell International (J. V. Grasso), Docket No. 99900058/81-02, dated March 11, 1982

Dear Sir:

Reference (1) reported the results of a Nuclear Regulatory Commission inspection conducted in our plant during the period February 8-11, 1982. Our response to the three (3) nonconformances cited in Reference (1) is provided below:

Nonconformance A

Contrary to the requirements of Section 9 of the QA Manual, several instances were noted relative to failure of either Manufacturing or Quality Assurance personnel to sign and/or date operations on a Valve Route Card to denote completion.

Response

Personnel in Manufacturing and Quality Assurance have been reminded of the requirements regarding proper completion of Manufacturing Route Cards. This area will be monitored by Quality Assurance to assure continued adequate performance. (The specific instances noted were not corrected as the activities represented by the Route Card have long since been completed.)



Rockwell
International

Nonconformance B

Contrary to the requirements of Section 6 of the QA Manual, a Valve Route Card did not list the correct Method Specifications for assembly of stem/stem disk and disk/piston. MS 7736 LR was listed on the Route Card, whereas MS 7718, Revision 0 was the applicable issued Method Specification.

Response

Through internal error, the specification of MS 7736 LR on the Route Card was not changed to MS 7718, Revision 0. The responsible personnel have been advised of this problem and cautioned to assure that the applicable documents agree in their listing of the correct Method Specifications in the future.

Nonconformance C

Paragraph NB-4432 in Section III of the ASME Code (1971 Edition) requires that permanent attachments to pressure parts be welding using procedures which have been qualified in accordance with the requirements of Section IX of the ASME Code.

Contrary to the above, locking pins were welded to stem discs and main stems (pressure parts) in main steam isolation valves which had been furnished to E. I. Hatch, Unit 2, without specification or evidence of use of welding procedures that had been qualified in accordance with Section IX of the ASME Code.

Response

It was not noted in the above nonconformance that the valves in question were manufactured in 1973. This plant began using Valve Route Cards in 1974. Such operations such as the welding of locking pins have historically been called out on Route Cards since that time. The fact that these operations were not specifically listed on an "assembly document/instruction" only illustrates that our systems, at that point in time, were not fully matured to the point of covering every detail of valve manufacture, as we know those systems today.

Insofar, as the status of previous inspection findings is concerned (Part D of Inspection Report No. 99900058/82-01), Reference (2) provided our final response to your previous report (81-02). Subsequently, Reference (3) forwarded your acknowledgement of that response, and indicated that no further action is required on our part. We therefore consider the previous inspection to be a closed issue.

Regarding the observations on our calibration subsystem (Part E.2.b. of Inspection Report No. 99900058/82-01), the torque multiplier used with torque wrenches has been included into our calibration system. Additionally, we have begun to note the reasons for return of devices (to manufacturers) for repair. This will facilitate verification that repairs are not related to device accuracy.

U.S. Nuclear Regulatory Commission
April 6, 1982
Page 3



Rockwell
International

If you should have further questions on this response to your Inspection,
do not hesitate to call.

Sincerely,

ROCKWELL INTERNATIONAL CORPORATION

A handwritten signature in dark ink, appearing to read 'J. V. Grasso'. The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

J. V. Grasso
General Plant Manager

JVG:db

cc: R. A. Bandukwala
D. J. Webb