

ORGANIZATION: CLOW CORPORATION  
CLOW ENGINEERED PRODUCT DIVISION  
WESTMONT, ILLINOIS

REPORT NO.:	99900396/82-01	INSPECTION DATES:	7/12-16/82	INSPECTION ON-SITE HOURS:	30
CORRESPONDENCE ADDRESS: Clow Corporation Clow Engineered Product Division (CEP) ATTN: Mr. M. L. Seshagiri, Quality Assurance Manager 40 Chestnut Avenue Westmont, Illinois 60559					
ORGANIZATIONAL CONTACT: Mr. M. L. Seshagiri, Quality Assurance Manager TELEPHONE NUMBER: (312) 325-6000					
PRINCIPAL PRODUCT: High Pressure Butterfly and Check Valves.					
NUCLEAR INDUSTRY ACTIVITY: Commercial nuclear valve production of Clow Engineered Product Division totals 60% of total production. Four contracts are presently in-house for current and future production. CEP's Certificate of Authorization expires in November 1982.					
ASSIGNED INSPECTOR: <u>I. Barnes</u> for J. W. Sutton, Reactive & Component Program Section (R&CPS)				8-10-82 Date	
OTHER INSPECTOR(S):					
APPROVED BY: <u>I. Barnes</u> I. Barnes, Chief, R&CPS				8-10-82 Date	
INSPECTION BASES AND SCOPE: A. BASES: 10 CFR Part 50, Appendix B and 10 CFR Part 21. B. SCOPE: 10 CFR Part 21 inspection, nonconformance/corrective action, process control, (machining), and calibration.					
PLANT SITE APPLICABILITY: Not identified.					

DESIGNATED ORIGINAL  
Certified By Phyllis Jouts

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A. <u>VIOLATIONS:</u> None		
B. <u>NONCONFORMANCES:</u> Contrary to Criterion V of Appendix B to 10 CFR Part 50 and Section 10, paragraph 10.1 of the QA Manual, use of only equipment with unexpired calibration dates was not assured, as evidenced by the observation of two measuring instruments being utilized in shop machining operations which had exceeded their calibration dates.		
C. <u>UNRESOLVED ITEMS:</u> None		
D. <u>STATUS OF PREVIOUS INSPECTION FINDINGS:</u> None		
E. <u>OTHER FINDINGS OR COMMENTS:</u> 1. 10 CFR Part 21 Inspection: The NRC inspector reviewed CEP's written policy used for the evaluation of identified component defects that could be reportable under 10 CFR Part 21 requirements. The inspector reviewed CEP's reporting procedure EPS No. 30-19-694. Posting of Part 21 requirements was checked and found to meet posting requirements. The inspector determined that the requirements for reporting and posting under 10 CFR Part 21 have been complied with as required by the regulation. 2. Nonconformance/Corrective Action: The NRC inspector reviewed CEP's QA Manual Section 12, "Nonconforming Items." The inspector also reviewed 25 deficiency reports, Material Review Board reports, and Quality Trend Analysis for contents. Associated documents and records were reviewed to determine compliance to QA Program requirements. The corrective action taken to prevent recurrence was examined for implementation. Areas designated for segregation of nonconforming items were inspected. Relative to the documents examined, the inspector determined that activities were in conformance with the QA program requirements and were being implemented as required.		

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During the inspector's review of CEP's deficiency reports, it was noted that some material purchased for fabrication of 28 valves had been heat treated more than once. Further review showed that the material was purchased for the manufacture of replacement valves for the Donald C. Cook generating plant which had been ordered by the American Electric Power Service Corporation in Purchase Order 0035-041-2X. Due to specification interpretation, materials for the valves were purchased by Clow Engineered Products Division from vendors who had not been approved in accordance with QA program requirements. This discrepancy was brought to the attention of the NRC Region III Office for review and resolution.

3. Manufacturing Control (Machining): The NRC inspector reviewed CEP's QA Manual, Section 5, "Manufacturing Control," and witnessed ongoing machine work within the shop. The inspector reviewed shop travelers, procedures, drawings, and related documentation for two jobs in progress. As a result of the review of this documentation, the inspector determined that machining operations were being performed as required by the QA Program requirements.
4. Calibration: The NRC inspector reviewed CEP's QA Manual Section 10, "Gage and Measuring Equipment Control." Measurement tools being used for measurement acceptance were checked for the calibration dates and compliance to QA/QC procedures. Procedures, records, and associated documentation were checked for compliance to QA Manual requirements. During the course of the inspection, it was observed that two measurement instruments were being used for product acceptance, even though the calibration label indicated that the equipment had not been calibrated as required by the due date. (See Section B of inspection results.)



Inspector J. W. Sutton  
 Scope/Module Part 21, Non Conformance/  
Connecticut Active Calibration

DOCUMENTS EXAMINED

1	2	TITLE/SUBJECT	3	4
1.	3.	EPS-30-19-674 - Part 21. Reporting.	-	-
2	8	Log of Part 21 Investigators.	Current.	-
3	4	Manual Section 12. "Non Conforming Items -"	7-11-80	0.
4.	8	Quality Trend Analysis Part 21. Review.	July 6-82	-
5	8	" " " " Part 21 Review.	July 9-82	-
6	8	Defective Rpts-	Various	-
7.	8	Defective Log Books/Records.	1981-82.	-
8.	8	MRB Rept.-	12-1-82	-
9.	4	Section 10 "Gage and Measuring Equipment Control"	7-11-80	0.
10	3	EPS-30-49-675. Procedure for Gage Calibration	7-1-81.	4
11	8	Equipment Labels - Volving Machine - AC 302 106.		
12.	6	Machine R 75A-068 DP. - Machine 108 #0 - Memo Change of Tooling. EPS-30-19-651.	5-27-82-	
13.	8	Use of Forks - Measuring Equipment - CCO 1001A.		

Columns:  
 1. Sequential Item Number  
 2. Type of Document  
 3. Date of Document  
 4. Revision (If applicable)

Document Types:  
 1. Drawing  
 2. Specification  
 3. Procedure  
 4. QA Manual  
 5. Purchase Order  
 6. Internal Memo  
 7. Letter  
 8. Other (Specify-if necessary)

PERSONS CONTACTED

Company Clow Corporation  
Clow Engineering Product Div.

Dates 7-12-1982

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Inspector J.W. Sutton

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NAME (Please Print)	TITLE (Please Print)	ORGANIZATION (Please Print)
1 J.W. SUTTON (X)	Reactor Inspector	USNRC
T.M. CASALE (X)	GENERAL MANAGER	EPD - CLOW CORP
J.B. POWER (X)	SALES MANAGER	EPD. - CLOW CORP.
C. TREMBINSKI (X)	PLANT SUPERINTENDENT	EPD CLOW CORP.
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Attended Exit - (X)		