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SACRAMENTO MUNICIPAL UTILITY DISTRICT □ 6201 S Street, Box 15830, Sacramento, California 95813; (916) 452-3211

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REGION V

September 9, 1982

D M STERNBERG, CHIEF
REACTOR PROJECTS BRANCH NO. 1
U S NUCLEAR REGULATORY COMMISSION
REGION V
1450 MARIA LANE, SUITE 260
WALNUT CREEK CA 94596

IE INSPECTION REPORT 82-28

As a result of the inspection conducted between July 6 and August 3, 1982, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), the following violation was identified:

10CFR50, Appendix B, Criterion IV, states in part that "Measures shall be established to assure that applicable...requirements which are necessary to assure adequate quality are suitably included or referenced in the documents for procurement of material equipment, and services, whether purchased by the applicant or by its contractors or subcontractors."

Quality Assurance Procedure 4, Revision 8, dated October 7, 1981 states on page 4-1, Item 7: "Procurement of Commercial Spare Parts (QA Class I and Selected Class II) must be originally approved by Quality Assurance, Nuclear Operations and Generation Engineering prior to releasing a purchase order. The purchase order shall state the item is a Commercial Grade Spare Part."

Contrary to the above, Purchase Order 30293 dated April 23, 1982 was released without original approval by Quality Assurance, Nuclear Operations and Generation Engineering. The purchase order did not have the words "Commercial Grade Spare Part" inscribed. This violation led to other violations of the licensee's Quality Assurance plan and ultimately to the installation of an a-c solenoid on a Class I valve which was for use with a d-c solenoid.

This is a Severity Level V Violation (Supplement I).

Response:

The Sacramento Municipal Utility District submits this response to the notice of violation.

The particular part was not identified as a Commercial Grade Spare Part. The District agrees that the purchase order did not state that the part was a commercial grade spare part.

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The QA Manual has since been revised and now defines Commercial Grade Spare Parts as follows:

4. Commercial Grade Spare Parts will exist under the classification of QA Class I provided they fall under the following conditions:
 - a. Manufactured for use by general industry, and
 - b. Normally manufactured prior to receipt of a purchase order by the supplier, and
 - c. Manufactured to national standards or by processes that are highly repetitive or automated, and
 - d. Can be ordered from the original manufacturer/supplier on the basis of specifications set forth in the manufacturer's published product description (sales catalog), and
 - e. Will be handled and stored in conformance to QA Class I at the Rancho Seco site.

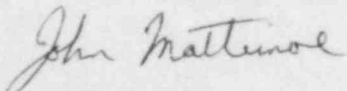
The QA Manual further states, "A receiving inspection will be performed on all Class I and Commercial Grade Spare Parts including contractor furnished materials."

and

9. Commercial Grade Spare Parts will as a rule lie under the Class I category, but because of their unique requirement of not meeting 10CFR50, Appendix B requirements, must be treated as a separate category. The receiving inspection data report (RIDR) must identify any unique characteristics that must be inspected or tested to qualify the part for use.

Training sessions were conducted August 31, 1982 with engineering and inspection personnel from Nuclear Operations, Generation Engineering, Quality Assurance, and Bechtel to cover how Commercial Grade Spare Parts are to be handled.

Full compliance was achieved as of 1 September 1982.


John J Mattimoe
Assistant General Manager
and Chief Engineer