

ENCLOSURE

M. W. Kellogg Company
Docket No. 99900021

Several of your activities do not appear to meet the requirements of the MWK QA Manual. These activities are identified in Items No. 1 and No. 2 as follows:

1. Procedures Not Available

- a. Contrary to requirements, the implementing procedure No. ES-151, "Standard Marking Requirements for Nuclear Piping Components, ASME Section III" was not available at the pipe cutting station, and the foreman and personnel performing the marking activity were unaware of the procedure.
- b. Contrary to Section 4.1 and Section 5.3 of their QA Manual, welding on commercial nuclear piping was performed without qualified procedures being available to the foreman or welder.
- c. Contrary to requirements of QAM Section 12, a formalized procedure for In-Plant audits was not available.

2. Procedures Not Followed

- a. Contrary to Section 6.2, of the manual, statements of certification and qualification records common to procedures for magnetic particle testing, ultrasonic examination and radiograph were unavailable to verify compliance.
- b. Contrary to requirements, of the QA Manual for return and reconditioning of unused low hydrogen welding rod after four hours exposure, no records were available to verify the requirement was met.
- c. Contrary to requirements, the NDE Procedure No. E404, Revision 3, in use on a specific contract, could not be identified in the related shop traveler package.
- d. Contrary to requirements, Reference Instruments, used to calibrate plant welding machines and magnetic particle testing devices, were not themselves calibrated