



BRAND-REX COMPANY

A PART OF ALZONA INC

WILLIMANTIC, CONNECTICUT 06226 • 203/423-7771

ELECTRONIC AND INDUSTRIAL CABLE DIVISION

December 13, 1982

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

Attention: Mr. Uldis Potapovs
Chief, Vendor Program Branch

Reference: Docket No. 99900325/82-01

Gentlemen:

This letter is written in reference to a telephone conversation with J. Sutton of your office on November 24, 1982. Mr. Sutton requested more detailed information concerning the nonconformances noted during his inspection of our facility. Brand-Rex Company's response is as follows:

NOTICE OF NONCONFORMANCE

Deviation 1 - A review was not performed by the Quality Assurance Manager with respect to material which had been identified as defective by Sacramento Municipal Utility District. This review was not performed as a result of the apparent failure of Brand-Rex Company's personnel to inform the Quality Assurance Manager of the condition.

CORRECTIVE ACTION TAKEN

- 1) An investigation of the suspect cable took place with the preliminary test results reported to Mr. John Collins of your office on August 26, 1982. A follow-up letter dated September 15, 1982 contained back-up test data to verify our position.

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- 2) To prevent this problem from reoccurring, a letter was issued by George Graeber, Vice-President and General Manager, to all inside and outside field representatives, engineers and manufacturing personnel reiterating Brand-Rex Company's policy regarding dissemination of information pertaining to defective material.
- 3) This letter was issued - August 1982.

NOTICE OF NONCONFORMANCE

Deviation 2 -A)Records do not exist that would enable the foreman to determine if the brazing operator had been trained and qualified prior to performing the brazing function.

CORRECTIVE ACTION TAKEN

- 1) Records for the brazing operator have been updated to conform to Procedure QA-823, Revision 2.
- 2) To prevent recurrence, the brazing records will be reviewed during the scheduled Quality Assurance audits of the cabling-taping area.
- 3) The update of the records took place on October 26, 1982.

Deviation 2 -B)The requalification schedule and schedule of qualified operators were not available within the Quality Control area and foreman station.

CORRECTIVE ACTION TAKEN

- 1) A requalification schedule has been established and is available within Quality Control and the foreman station. A copy of the operator Certificate of Qualification is also available in these areas.
- 2) To prevent recurrence, the requalification schedule will be reviewed during the scheduled Quality Assurance audits of the cabling-taping area.
- 3) The requalification schedule was issued on October 25, 1982. The Certificate of Qualification was issued on October 26, 1982.

Deviation 2 -C)Records do not exist to indicate that operators had completed the established training program.

CORRECTIVE ACTION TAKEN

- 1) All reference to training has been deleted from QA-823, Revision 2, October 1982. This procedure is strictly for qualification of Armor/Brazing operators. On-the-job training for new employees in Armor/Brazing is performed within the manufacturing area according to established operating procedures.
- 2) To prevent recurrence, Armor/Brazing qualifications will be reviewed during the scheduled Quality Assurance audits of the cabling-taping area.
- 3) Requalification of the operator took place October 26, 1982.

Deviation 2 -D)Records do not exist that indicate that Quality Control examined and tested the qualification braze for bond strength.

CORRECTIVE ACTION TAKEN

- 1) The operator in question was requalified and records of this test are available within the Quality Control area.
- 2) To prevent recurrence, the qualification records will be reviewed during the quarterly Quality Assurance audits of the cabling-taping area.
- 3) Requalification of the Armor/Brazing operator took place on October 26, 1982.

NOTICE OF NONCONFORMANCE

Deviation 3 - A brazing procedure had not been generated, approved or qualified prior to the performance of brazing repair operations on armor cable.

CORRECTIVE ACTION TAKEN

- 1) Operating Instruction No. 086 (Armor/Brazing) has been approved and implemented.
- 2) To prevent recurrence, operations within the manufacturing area are being reviewed for proper operating instructions.
- 3) Implementation of the Armor/Brazing procedure was effective October 1982.

If any questions arise pertaining to the action, feel free to contact the writer.

Very truly yours,

BRAND-REX COMPANY
A Part of Akzona, Inc.



Nathan S. Kitchen
Quality Assurance Engineer

cjs
cc: G. Graeber