

ORGANIZATION: PACIFIC AIR PRODUCTS COMPANY
SANTA ANA, CALIFORNIA

REPORT NO: 99900769/82-02	INSPECTION DATE(S) 7/12-15/82	INSPECTION ON-SITE HOURS: 26
CORRESPONDENCE ADDRESS: Pacific Air Products Company ATTN: Mr. L. R. Hess President 3133 Harvard Blvd. Santa Ana, CA 92704		
ORGANIZATION CONTACT: Mr. T. Conlon, Manager, Quality Assurance TELEPHONE NUMBER: (714) 557-1710		
PRINCIPAL PRODUCT: Air Control Equipment NUCLEAR INDUSTRY ACTIVITY: 75% based on 1981 sales.		
ASSIGNED INSPECTOR:	<u>R. E. Oller</u> R. E. Oller, Reactive & Component Program Section (R&CPS)	<u>8-10-82</u> Date
OTHER INSPECTOR(S):		
APPROVED BY:	<u>I Barnes</u> I Barnes, Chief, R&CPS	<u>8-12-82</u> Date
INSPECTION BASES AND SCOPE: A. <u>BASES</u> : 10 CFR Part 50, Appendix B and 10 CFR Part 21. B. <u>SCOPE</u> : Status of previous inspection findings; equipment calibration; nonconformances and corrective action; internal audits; and 10 CFR Part 21.		
PLANT SITE APPLICABILITY: Rancho Seco - Docket No. 50-312 Nine Mile Point - Docket No. 50-410 Clinton Unit 1 - Docket No. 50-461		

DESIGNATED ORIGINAL
Certified By Rheanne Joub

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PDR GA999 EMVPACAP
99900769 PDR

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<p>A. <u>VIOLATIONS:</u></p> <p>None</p> <p>B. <u>NONCONFORMANCES:</u></p> <ol style="list-style-type: none">1. Contrary to Criterion V of Appendix B to 10 CFR Part 50, and paragraph 2.3 of QA Manual Procedure 12.0, Revision 1, the date of the last calibration was not shown on sticker labels attached to several micrometers and calipers, and neither the last calibration date nor the calibration due date were legible on the label attached to the "Porto-Lab" testing console.2. Contrary to Criterion V of Appendix B to 10 CFR Part 50, and paragraph 2.6 of the QA Manual Procedure No. 12.0, Revision 1, certain micrometers and calipers were stored loose and unprotected among other tools in a portable tool box.3. Contrary to Criterion V of Appendix B to 10 CFR Part 50, and paragraph 3.1 of the QA Manual Procedure No. 12.0, Revision 1, a broken air pressure gage was not tagged to prevent its inadvertent use.4. Contrary to Criterion V of Appendix B to 10 CFR Part 50, and paragraph 5.3 of the QA Manual Procedure 15.0, Revision 0, two completed nonconformance reports (i.e., No. 6291-1, dated March 23, 1982, and No. 6351-1, dated May 10, 1982) were not signed in the "Final Review" signature space as evidence of review by QA.5. Contrary to Criterion V of Appendix B to 10 CFR Part 50, and paragraph 2.2 of the QA Manual Procedure No. 18.0, Revision 2, an internal audit of the entire QA program had not been performed since July 1, 1981.6. Contrary to Criterion V of Appendix B to 10 CFR Part 50, and paragraph 3.1 of the QA Manual Procedure 18.0, Revision 2, forms other than the QA manual exhibit forms were being used to document internal audits. <p>C. <u>UNRESOLVED ITEMS:</u></p> <p>None</p> <p>D. <u>STATUS OF PREVIOUS INSPECTION FINDINGS:</u></p> <ol style="list-style-type: none">1. (Closed) Nonconformance A (82-01): Failure by receiving inspectors to properly tag shipments of galvanized sheet steel with green accepted tags as required by the QA Manual Procedure No. 10.0.		

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The inspector verified that, in accordance with the vendor's response letter dated May 7, 1982, green acceptance tags are now being maintained on the racks which support the sheets of steel. In addition, the top sheet of each stack is identified with the PO number, heat number, size, and quantity using indelible ink. The QA procedure, dated November 12, 1981, covering the unloading and marking of steel plate, sheet, and shapes, is being reemphasized to the inspection personnel.

2. (Closed) Nonconformance B (82-01): Failure by the Chief Engineer to assure that design drawings contained correct and adequate application of design criteria, as required by the QA Manual Procedure No. 3.0.

The inspector verified that, in accordance with the vendor's response letter dated May 7, 1982, a procedure, "QA Procedure 3-82" was issued on May 20, 1982, which provided for the required use of an engineering checklist, effective June 2, 1982. Review of a completed checklist for the Rancho Seco order, Specification M13.14, verified that the above procedure is being implemented.

3. (Closed) Nonconformance C (82-01): Failure by the in-process inspector to tag a nonconforming actuator mounting bracket which contained cracks at the end of the bend.

The inspector verified that, in accordance with the vendor's response letter dated May 7, 1982, 100% inspection of formed items is being performed and any brackets found to contain cracks are being tagged with a blue hold tag. In addition, a memorandum dated May 7, 1982, was issued by the Director of Quality Assurance, which required rejection of all cracked material. Review also verified that a Nonconformance Report No. 5445-1, was issued on February 10, 1982, to document the original defective bracket.

E. OTHER FINDINGS OR COMMENTS:

1. Equipment Calibration: The inspector reviewed Procedure 12.0, "Control of Measuring and Test Equipment" of the vendor's QA Manual, and observed the calibration status of numerous measuring and testing devices. To verify that the above observed inspection, test, and other measuring devices, used in activities affecting quality, are controlled and calibrated on a scheduled basis, and the results documented in accordance with written procedures, a review was made of: the Instrument Calibration Log record for 18 devices; certificates of calibration and procedures provided by 5 subvendors; and the PAPCO's Approved Vendor List.

Within this area, three nonconformances with NRC and QA program requirements were identified. (See paragraph B.)

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2. Nonconformances and Corrective Action: The inspector reviewed Procedure No. 15.0, "Nonconforming Materials, Parts or Components," and No. 16.0, "Corrective Action," of the vendor's QA Manual.

To verify that nonconforming items are reviewed and accepted, rejected, repaired, or reworked, and that conditions adverse to quality, including the cause, are promptly identified and corrected, a review was made of: the log of nonconformance reports for the period of January 8, 1980, through July 9, 1982; 10 nonconformance reports; 5 shop production order travelers; 10 corrective action request summary sheets; and 9 corrective action requests.

Observations were made in the shop of damper parts identified as nonconforming by attached blue "Hold" tags.

Within this area, one nonconformance with NRC and QA program requirements was identified. (See paragraph B.)

3. Internal Audits: The inspector reviewed Procedure No. 2, "Quality Assurance Program," No. 18.0, "Audits," and No. 18.1, "Quality Audit Training Program," of the vendor's QA manual.

To verify that planned periodic audits of all aspects of the QA program are performed in accordance with written procedures or checklists by qualified personnel, the results are documented and reviewed by management, and followup action is taken where indicated, a review was made of: the report of the annual internal audit performed on July 1, 1981; audit schedules for 1981 and 1982; four QA manual exhibits which are required to be used to document internal audits; various checklist records of past audits; a management review memorandum dated December 11, 1981; and certificates of qualification for seven audit personnel.

Within this area, two nonconformances with NRC and QA program requirements were identified. (See paragraph B.)

4. 10 CFR Part 21: The inspector reviewed Procedure No. 15.1, "10 CFR Part 21-Reporting of Substantial Safety Hazard Defects and Non-compliances," of the vendor's QA manual, to verify that adequate documented measures are available to meet the reporting requirements of 10 CFR Part 21.

Observation was made of posted documents required by 10 CFR Part 21.

Within this area, no violations to 10 CFR Part 21 were identified.

Scope/Module Equipment
calibrationDOCUMENTS EXAMINED

1	2	TITLE/SUBJECT	3	4
1	4	PAPCO QA Manual Procedure No. 12.0	5-9-77	1
2	8	Record of ^{consisting} Instrument Calibration Log for measuring devices.	Various	NA
3	3	PAPCO Procedure "Gage Block vs Instrument Reading" for calibrating micrometers and calipers	3-17-82	"
4	8	Following subvendor calibration records & procedures		
		(1) American Gage & Instrument Co. Calibration Report No. 8341	4-23-81	"
		(2) Homer R. Dulin Co. Calibration Procedure for PAPCO Porco-Lab TM2, Series III	9-10-79	"
		(3) Homer R. Dulin calibration certifications for three orifices of the Porco-Lab	11-11-81	"
		(4) American Gage & Instrument Co. Calibration Report No. 9704 for Contact Thermometer PTC	2-4-82	"
		(5) seven (?) Airco Co (V.B. Anderson) Calibration Reports for welding machine voltmeters and ammeters	4-7-82	"
		cont.		

Document Types:

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

Columns:

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

1	2	TITLE/SUBJECT	3	4
1	4	PAPCo's QA Manual Procedures No. 15.0 and 16.0	1-28-77	0
2	8	Record consisting of "Log of Nonconformance Reports" for the period of 1-8-80 through 7-9-82	—	NA
3	8	Records consisting of the following Nonconformance Reports:		
		(1) No. 6394-1	5-6-82	"
		(2) No. 5500-5	6-25-82	"
		(3) No. 6291-1	2-23-82	"
		(4) No. 6351-1	5-10-82	"
		(5) No. 6009-1	5-10-80	"
		(6) No. 5984-4	2-29-80	"
		(7) No. 5984-3	2-26-80	"
		(8) No. 5984-2	1-30-80	"
		(9) No. 5551-1	9-14-81	"
		(10) No. 5555-2	1-11-82	"
4	8	Records consisting of following shop Production Order Travelers		
		(1) Job No. 6394, Nine Mile Point, Production Order 01474	current	"
		(2) Job No. 5500, Clinton Unit 1, Production Orders Nos. 0068, 01620, 01631, and 01632.	current	"

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1	2	TITLE/SUBJECT	3	4
1	4	APCO's QA Manual Procedure No. 18.0, No. 18.1, and No. 2	12-28-79	2
2	8	Record consisting of the 1981 Internal Audit Report	7-1-81	NA
3	8	Records consisting of Audit Schedules for 1981 and 1982	—	"
4	8	Following QA Manual Exhibit record forms:		
		(1) No. 18.0-1, "Quality Audit Schedule	12-28-79	"
		(2) No. 18.0-2, "Quality Audit Checklist	"	"
		(3) No. 18.0-3, "Quality Audit Findings	"	"
		(4) No. 18.0-4, "Quality Audit Log	"	"
5	8	Various Checklist records of past audits	—	"
6	6	Management Review - 12/18/81 Memorandum	12-11-81	"
7	8	Certificates of qualification for seven audit personnel.	12-21-81	"

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1	2	TITLE/SUBJECT	3	4
1	4	PAPCO QA Manual Procedure No. 12.0	5-19-77	1
2	8	Record of ^{consisting} Instrument Calibration Log for measuring devices.	VARIOUS	NA
3	3	PAPCO Procedure "Gage Block vs Instrument Reading" for calibrating micrometers and calipers	3-17-82	"
4	8	Following subvender calibration records & procedures		
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Scope/Module Nonconformances
and Corrective ActionDOCUMENTS EXAMINED

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1	4	PAPCO's QA Manual Procedures No. 15.0 and 16.0	128-77	0
2	8	Record consisting of "Log of Nonconformance Reports" for the period of 1-8-80 through 7-9-82	—	NA
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