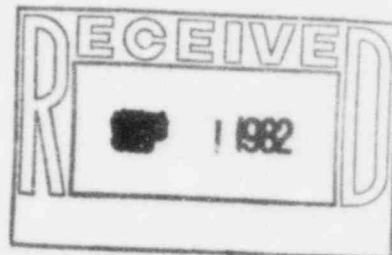


PACIFIC PUMPS

DRESSER

5715 BICKETT STREET □ HUNTINGTON PARK, CALIFORNIA 90255
TELEPHONE 213/588-2201 □ TELEX 673-283
August 27, 1982

United States Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011



Reference: Docket No. 99900063/82-01
NRC Inspection April 20-22 1982

Attention: Uldis Potapovs, Chief
Vendor Program Branch

In response to the notice of Non-Conformance we submit the following:
(Please note - the disposition of items, with Linear Discontinuities will be covered in a separate report.)

The length of time that has elapsed since these Intermediate Covers were processed in our shop makes it difficult to determine a cause in this case. Nevertheless, a very thorough search was made of the records which revealed the following facts:

- As required in our Procurement Documents the foundry that produced these Intermediate Covers performed a Visual Inspection to MSS-SP-55 and found them to be acceptable. This inspection is documented in the CMTR's on file here.
- A Receiving Inspection as required by our Q.A. Program was performed on these Intermediate Covers. This inspection also found these castings to be acceptable.
- The above Receiving Inspection was performed to an approved procedure with a specified acceptance criteria.
- The above Receiving Inspection was performed by fully qualified members of the Inspection Department.
- The results of this inspection was fully documented in our "Receiving Acceptance Report" on file here.
- Other inspections were planned and performed during the processing of these parts in our shop.
- Rejected Material Reports were generated during this time to cover casting defects and other dimensional non-conformities. All of these were ultimately accepted by subsequent Inspection operations.

In conclusion, this thorough search of the records did not reveal any flaws or weaknesses in the system that would have caused the now apparent Linear Indications to go undetected. All of the above facts were verified by the NRC Inspection.

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PDR GA9999 EMVPACP
99900063 PDR

PACIFIC PUMPS DIVISION □ DRESSER INDUSTRIES, INC.

Without determining a specific cause for a non-conformance it is difficult at best to apply appropriate corrective action. There have been some evolutionary changes to the program that would tend to reduce the chance of similar occurrences in the future and improve the documentation of Quality Control activities. These changes are described below:

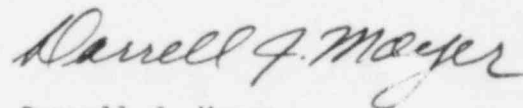
- (1) At the time the original equipment castings were processed; the Visual Inspection Procedure was applied only at Receiving Inspection. It did not appear on the routings used after release to our shop. Visual Inspection for casting defects was expected of the inspector at Inspection Operations called out on the routings used in our shop even though the written procedure was not applied. This is evidenced by the Rejected Material Reports generated for such defects. The first change occurred when the Visual Inspection Procedure was added to the shop routings.
- (2) The first change added the written Visual Inspection Procedure to the shop routings but only to the first operation on the routing. The second change was made recently after the Linear discontinuities were discovered by Texas Utilities. This change applied the written Visual Inspection Procedure to the end of the shop routing in addition to the existing call out at the beginning of the routing. This will provide documented Visual Inspection to the approved written procedure after all manufacturing operations machining, welding, cleaning, etc.
- (3) Lastly, a change was made to our Q.A. Program in 1979 requiring our inspectors, other than NDE Inspectors, to have yearly eye exams. Previously they were examined every two years. The NDE Inspectors have always been required to have yearly eye exams.

In addition to the above, Visual Inspection of castings has been covered in our regular training sessions as well as on the job training by Inspection Foremen to individual inspectors.

I trust you will find the above response satisfactory. If there are further questions please contact me.

Sincerely,

DRESSER INDUSTRIES, INC.
Pacific Pumps Division



Darrell J. Moyer
Quality Assurance Manager