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rotork-actuation
A Rotork control and instrumentation company

your reference

our reference

date

November 8, 1990

E. William Brach, Chief
Vendor Inspection Branch
Division of Reactor Inspection & Safeguards
Office of Nuclear Reactor Regulation
United States Nuclear Regulator Commission
Washington, DC 20555

Subject: Audit of Rotork Controls Inc. - Docket No. 99900839/89-01
Audit of Rotork Controls Ltd. - Docket No. 99901066/89-01

Dear Mr. Brach:

On April 18, 1990, I wrote to you to respond to the above listed audit reports. I attached specific responses from Martin Hunt, Quality Assurance Manager, Rotork Controls Ltd., and Doug Matla, Quality Assurance Manager, Rotork Controls Inc. During a recent meeting of Martin Hunt, Doug Matla, and myself, we reviewed the status of our actions. I thought it would be helpful if I provided a summary for you.

Rotork Controls Inc.

- 1) B3(89-01-03) - Although we have added a statement to all our nuclear purchase orders to impose applicable QA requirements on lower tier subcontractors and vendors, we have not revised Section 7, Appendix A of the QC Manual. Doug Matla has produced a revision to the appendix which I am presently reviewing with him. We will issue and implement a revision of Appendix A prior to December 31, 1990.
- 2) B5(89-01-05) - A procedure to include the return of items from the field has been written and implemented.
- 3) B2(89-01-02) - A program to dedicate commercial grade items is being implemented (see below for further information).

All other items are completed and implemented.

Rotork Controls Ltd.

- 1) 3B(89-01-04), 3C(89-01-05), 5B(89-01-08) - All of these non-conformances pertain to corrective actions, vendor rating, vendor interfaces, etc. Although we have implemented some improvements to the system, a major step change will be accomplished through the use of a new monitoring system. The software for

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this system is being written at this time. We anticipate that the software and trials will be done within 2 - 3 weeks. Full implementation will be by December 31, 1990. The new system will dramatically increase our ability to monitor our vendors.

- 2) 89-01-10, 89-01-11, 89-01-12 - All of these unresolved items deal with a dedication program, identifying materials from the original qualification report, etc. These items will be dealt with below.

All other items are completed and implemented.

Dedication Program

We have made significant progress in the area of dedication of commercial grade components. The following summarizes our actions since April 1990:

- 1) We have issued a request to quote for non-metallic components to test laboratories/consulting firms who are familiar with the dedication process. After extensive interface with these companies, we have narrowed the search to three firms. A choice will be made within the next 14 days. We expect this work will be completed by the end of February 1991. From this contract report, we anticipate that we will obtain a link with the materials used in the original test actuators, product we have shipped, and product we are shipping. In addition, a dedication process for the future will be provided.
- 2) We have identified a list of critical components. We have also identified some of the critical characteristics of these components.
- 3) By identifying the critical components, we have also identified the components which will not need to be dedicated. Although we have not completed the analysis of each component, we have identified the steps necessary to back up our choices.
- 4) We have generated a database for our nuclear parts. This database will allow us to put all the parts in their proper "categories." The database will also be used to generate procedures for dedication of parts.

We plan on implementing a complete "dedication" system by June 30, 1990. Prior to this (probably March/April 1990), we would like to visit with you to review the system.

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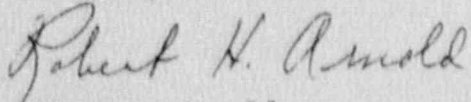
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Please let me know if you have any questions.

Sincerely,



Robert H. Arnold
President

RHA/ksj

cc: Doug Matla - Rotork Controls Inc.
Fred Wasbhurn - Rotork Controls Inc.
Martin Hunt - Rotork Controls Ltd.