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December 7, 1990

Mr. Uldis Potapovs, Acting Chief Vendor Inspection Branch Division of Reactor Inspection and Safeguards Office of Nuclear Reactor Regulation United States Nuclear Regulatory Commission Washington, D. C. 20555

REFERENCE: NRC Inspection Docket No. 99900001/90-01 Notice of Nonconformance

Dear Sir:

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This letter provides written explanation and corrective action taken for the two (2) nonconformance items referenced in the above inspection report.

Attachment I addresses each nonconformance separately.

If questions should arise during your review, please feel free to contact me at (804) 522-5654.

Sincerely,

B&W FUEL COMPANY COMMERCIAL NUCLEAR FUEL PLANT

W. T. Engelke, Manager Quality Assurance

WTE: cmg LETT/69-TX.WTE

Attachment

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#### ATTA HMENT I

#### 1. NOTICE OF NONCONTOPMANC

Section 5 of QC-506, "Recei \_\_\_\_spection-Lower End Fitting Mark C", Revision 1, dated Octor : 27, 1980, requires that dimensions of lower end fittings be measured and deviations reported to the Inspection Supervisor and nonconforming conditions processed accordingly.

Contrary to the above, CNFP failed to identify excessive raised metal in the form of a burr adjacent to one grid pad bore hole on the KMC supplied lower end fitting marked with serial number 15273-04. (90-01-01)

# Steps Taken to Correct Nonconformance:

The burr identified on lower end fitting serial number 15273-04 has been removed. Prior to use, all lower end fittings will be cleaned and reinspected for freedom of burrs.

## Steps Taken to Prevent Recurrence:

All receiving inspection personnel have been reinstructed in performance of visual inspection.

# Corrective Action Completion Date:

Unknown - no plans at this time to use these lower end fittings.

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#### ATTACHMENT I

### 2. NOTICE OF NONCONFORMANCE:

1.

Criterion V of Appendix B to 10 CFR Part 50 requires that activities affecting quality be prescribed by documented procedures.

CNFP procedure QC-1414, "Retention and Storage of Quality Assurance Records", Revision 4, dated September 13, 1990, is the procedure that documents activities for QA records.

Contrary to the above, QC-1414, Revision 4, does not provide requirements for storage and retention of X-ray film (radiographs), and does not identify whether the radiographic film and the radiograph reviewer reader sheets are considered quality records. (90-01-02)

# Steps Taken to Correct Nonconformance and to Prevent Recurrence:

At the present time, we are retaining both radiographs and reviewer reader sheets as quality records. However, we are strongly considering retaining only the reviewer reader sheets as quality records and disposing of the radiograph film.

Procedure QC-1414 will be revised to address the appropriate quality records in regard to radiograph film and reviewer reader sheets.

Corrective Action Completion Date: March 31, 1991