

Swagelok

CRAWFORD FITTING COMPANY
SOLON, OHIO 44138

FRED A. LENNON
CHAIRMAN

PHONE (216) 248-4500
FAX (216) 349-5970

December 13, 1990

Attn: Mr. Greg Cwalina
U.S. Nuclear Regulatory Commission
Washington D.C. 20555
Mail Stop WF-9D4

Ref: Nupic Audit of Crawford Fitting Company

Dear Mr. Cwalina:

I am enclosing a copy of the finding per our telephone conversation on December 5, 1990.

Crawford Fitting Company manufactures "Swagelok" tube fittings and supplies these to various nuclear power plants through our distributors. Please refer to docket no. 9990L012/86-01 for detail description of Crawford Fitting Company and its distribution network.

As the finding report will indicate, we were asked to "provide objective evidence that distributors are effectively maintaining the identification of the items".

This would require Crawford Fitting Company to audit the distributor's Identification Verification program.

As you indicated over the phone conversation this was licensee's responsibility, but distributors in turn should audit Crawford Fitting Company.

However, NCA-3800 (specifically NCA-3853(g)) says that it is not necessary for material supplier to audit material manufacturer if certificate holder has audited and approved the material manufacturer's program.

We would like for you to take this into consideration and let us know if Nupic (licensee or certificate holder) audits and approves Crawford Fitting Company's (material manufacturer) program. Does the distributor (material supplier) still have to audit Crawford Fitting Company.

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CRAWFORD FITTING COMPANY

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We will be waiting to hear from you to determine the proper response on our part.

Thank you very much for your help.

Sincerely,



A.T. Patil
Chief Engineer/
Quality Assurance Manager

ATP/kc

cc: Emery Zahuranec

Perry Nuclear Power Plant
VENDOR ACTION REQUEST

No. VA- 10389 -00003-0004

Criteria No. XVIII

Vendor CRAWFORD

Initiated By: David W. Grow

Initials DWG

Issue Date 10/31/90

Governing Requirement: QSM-18 REV 3 (6-20-90) PARA 1.1 "... VERIFY COMPLIANCE WITH ALL ASPECTS OF THE QUALITY ASSURANCE PROGRAM AND TO DETERMINE THE PROGRAM'S EFFECTIVENESS."

Observation: QA MANUAL SECTION QSM-19 REV 5 (6-20-90) PARA 4.2 STATES THAT "SALES AND SERVICE REPRESENTATIVES SHALL HAVE THE RESPONSIBILITY TO MAINTAIN THE IDENTIFICATION OF ITEMS SUPPLIED AND TO BE ABLE TO VERIFY TO THE CUSTOMERS THAT THE ITEMS AND CERTIFICATIONS DELIVERED ARE THE ITEMS SUPPLIED AND CERTIFIED BY CRAWFORD FITTING CO AS SHIPPED DIRECTLY OR THROUGH THE REGIONAL WAREHOUSE." THERE WAS NO CONCLUSIVE EVIDENCE IN SUPPORT OF THE GOVERNING REQUIREMENT THAT VERIFIED THAT DISTRIBUTORS ARE EFFECTIVELY MAINTAINING THE IDENTIFICATION OF THE ITEMS.

Recommendation: PROVIDE CONCLUSIVE EVIDENCE THAT DISTRIBUTORS ARE EFFECTIVELY MAINTAINING THE IDENTIFICATION OF THE ITEMS

Upgrade to CAR: Y N

10CFR21 Reportable: Y N

CR No. N/A

Reviewed for Significance By: [Signature]

11/5/90

Response Due Date 12/01/90

Discussed With [Signature]

Cause: _____

Proposed Corrective Action and Steps to Prevent Recurrence: _____

Planned Completion Date / /

Response By: _____ Date / /

Cause Code _____ Accept _____ Reject _____

Evaluation By: _____ Date / /

Verification Activity Performed: _____

Verified By: _____ Date / /