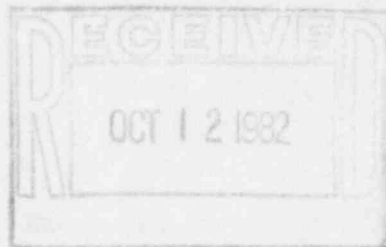




Welding Products

Division of Airco, Inc.

P.O. Box 6686
Sparrows Point
Maryland 21219
Telephone: 301-477-3300
TWX: 710-233-1408



October 8, 1982

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

Attention: Uldis Potapovs, Chief
Vendor Program Branch

Subject: Docket No: 99900774/82-01

Gentlemen:

Listed below, please find our corrective/preventive action for the Notice of Violation and Notice of Nonconformance as detailed in your letter of August 6, 1982.

I. Violation: No formal procedure for evaluation of deviations or notification of the licensee or purchaser of deviations per 10CFR Part 21.

- ✓ Corrective/Preventive Action: A procedure for the evaluation of deviations or notification of the licensee or purchaser of deviations which satisfies the requirements of 10CFR Part 21 will be written and made part of our QA Manual.

Date Corrective/Preventive Action Completed: November 15, 1982

II. Nonconformances:

A. Military/Nuclear Core Wire Area

✓ Corrective Action

1. The 20 tote cans which did not contain proper identification to indicate that the cans had been inspected prior to filling were removed from the Mil/Nuclear Wire Area and downgraded to commercial status.

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A member of the BOC Group

2. The can that did not contain a Military/Nuclear identification tag was moved to the commercial wire storage area.
3. Covers were placed on the cans which were uncovered.

✓ Preventive Action

1. A new procedure for the receipt inspection/QA verification of Military/Nuclear core wire has been written and will be fully implemented by November 1, 1982.
- 2&3. Daily surveillance of the storage area by QA and production supervisory personnel.

Date Preventive Action Completed - Item 1-November 1, 1982,
Items 2 and 3 - ongoing.

- B. Internal audit of Cleveland facility had not verified the implementation of corrective action pertaining to handling of Military/Nuclear wire at the Cleveland plant.

✓ Corrective Action

The audit of March 30, 1982 was intended as a facility survey for qualification on the Approved Vendors List (AVL) and not an in-depth implementation internal audit. As such, no immediate corrective action was taken.

✓ Preventive Action

1. A QAI (Quality Assurance Instruction) dated 6/15/82 was written which incorporated the memos dated 3/3/82 and 3/9/82 with the previous procedure for wire conversion in the Cleveland Wire Mill.
2. An in-depth internal audit of the Cleveland facility will be performed by December 31, 1982.

Date Preventive Action Completed - December 31, 1982

C. Indoctrination and Training

Corrective Action

1. All QA/QC personnel as well as other salaried or supervisory personnel involved in the QA program are undergoing indoctrination in the QA program as a part of the preparations for the upcoming ASME resurvey.

2. ✓ With respect to the materials handlers and center checkers, since these are hourly bargaining unit positions, any individual bidding into the position receives on-the-job training from his direct supervisor and is considered probationary in nature for a minimum of 30 days, so that ability to perform satisfactorily the position's functions may be demonstrated. Furthermore, the necessary quality instructions are provided in written form (sampling plans, acceptance criteria, detailed procedures, etc.) and posted for ready reference. We, therefore, don't consider further formal indoctrination sessions conducted by QA to be necessary.

✓ Preventive Action

Conduct indoctrination sessions for all future new QA personnel.

Date Corrective/Preventive Action Complete - Corrective action - 10/15/82. Preventive action - ongoing.

D. ✓ Vendor Evaluation

✓ Corrective Action

The program of formal vendor evaluations on a programmed basis was implemented in October, 1981. Prior to that time, only random/periodic vendor evaluations were conducted.

The second yearly cycle of vendor evaluations will commence, starting with an audit of Raritan River Steel on 11/2/82.

✓ Preventive Action

None other than comply with QA manual requirements.

Date Corrective/Preventive Action Complete - ongoing

E. Welding Procedure AWP - SFA 5.5 not at Welding Station

✓ Corrective Action

A copy of the missing procedure was given to the welder following the conclusion of the inspection.

✓ Preventive Action

Include this area in the internal audit program to prevent recurrence.

Date Corrective Action Completed - May 21, 1982.

F. QA Audits

✓ Corrective Action

Present Airco management has provided the support to assure that corrective action statements address this cause and long term corrective action of identified discrepancies. The results of the past two internal audits revealed no identified discrepancies.

✓ Preventive Action

Maintain top management support.

Date Corrective Action Complete - ongoing.

G. Inspection Stamp Log

✓ Corrective Action

Dates inspection stamps received have been made part of the Inspection Stamp Log.

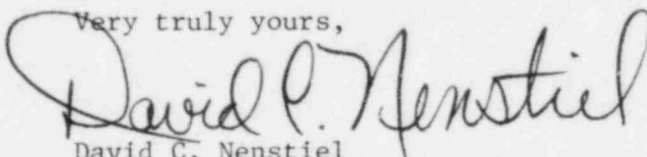
✓ Preventive Action

Include this item in internal audit program.

Date Corrective Action Completed - 6/15/82.

I trust the above corrective/preventive action meets with your approval.

Very truly yours,



David C. Nenstiel
Quality Assurance Engineer

DCN/clp