

**EXXON NUCLEAR COMPANY, Inc.**

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January 20, 1982

Uldis Potapovs, Chief  
Vendor Inspection Branch  
US Nuclear Regulatory Commission IV  
611 Ryan Plaza Drive, Suite 1000  
Arlington, Texas 78012

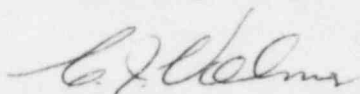
DOCKET No. 99900081/81-01

Dear Mr. Potapovs:

Attached is our response to the Notice of Nonconformance (Docket No. 99900081/81-01), transmitted by your letter of December 18, 1981.

Should you have any additional questions on these matters please feel free to call me at (509) 375-8257.

Yours very truly,



C.J. Volmer  
Manager, Quality Assurance

CJV:ETJ:rd  
Attachment

## ATTACHMENT

### Nuclear Regulatory Commission Notice of Nonconformance:

Section 5.0 of the Exxon Topical Report, XN-NF-1A, states in part, "The Quality Assurance Program and associated quality-related design, procurement, manufacturing, inspection, handling, and shipping activities are prescribed by documented instructions, procedures, and drawings, as appropriate, to assure adequate definition of instruction for satisfactory completion of activities. The instructions, procedures, and drawings include qualitative and quantitative acceptance criteria to verify that important activities have been satisfactorily accomplished."

Nonconformances with these requirements are as follows:

- A. Product Specification ...(for fuel clad)...states in part: "Those QA documents which are specific to a purchase order, such as process outlines or inspection plans, must be submitted with the documentation for each order."

Contrary to the above, ...(the applicable Quality Control Plan)...and process outline could not be identified as applicable to purchase order for fuel clad. A large number of outlines and plans were submitted in past years for clad and other tubular products. These outlines and plans had been revised on a number of occasions. However, there was no evidence of which outline and plan was applicable to a particular purchase order.

### ENC Response:

ENC has reviewed the nonconformance and agrees with the fact that the specific process outline and/or inspection plan were not referenced to the reviewed purchase order. This condition has been corrected by reviewing this requirement with the vendor and reinstituting a transmittal letter from the vendor for each purchase order which specifies the applicable process outlines and quality plans. This action was completed November 30, 1981. This nonconformance did not impact product quality.

### Nuclear Regulatory Commission Notice of Nonconformance:

- B. Quality Assurance Procedure No. 7, Procurement Control, Revision 2, Paragraph 3.4, states in part:

"3.4.1 QA-NF shall review and approve supplier quality manual or equivalent documentation."

"3.4.2 Quality Control shall review and approve documentation relating to supplier QC inspection planning."

Contrary to the above, a clad supplier's quality manual had undergone extensive revision, 13 sections were revised of a 19-section manual, in April, 1981, and there was no evidence of its approval. The same supplier's inspection activities had been changed to add Contractile Strain Ratio testing and there was no evidence of review and approval of the testing documentation: i.e. procedure, inspection plan, etc. This testing had been added to the scope of the supplier in May 1981.

### ENC Response:

In reference to the supplier's QA manual review which ENC commits to perform as stated in QAP #7, "Procurement Control" Para. 3.4.1, it is ENC's practice to perform such reviews of previously approved QA manuals during the next scheduled audit of that supplier. It should be noted that the ENC program does not commit to a date of receipt review, but remains flexible in regard to the timing. This position is justified in that it enables ENC to schedule its review of vendor's QA manual consistent with an audit to verify implementation. This system has worked very well in the past for previously approved vendors and ENC does not feel that there is a need to alter this practice.

As a matter of record, the subject QA manual was reviewed and found acceptable during our annual audit, which was conducted during December, 1981. Thus, ENC does not consider this item to be a nonconformance.

In regard to the second item, it is important to understand that the specific attribute that is addressed is an attribute that is applied to certain contracts under certain circumstances. In fact, the original purchase order excluded this specific requirement. However, the test for this attribute was later requested (Alteration #3 of the purchase order, 5/13/81.). At that point in time, the test requirement was not carried in the normal scope of the supplier's quality plan. Therefore, it was handled on an exception basis, which allowed documents such as purchase order, test certification data, and Quality Control releases, to establish assurances that tests have been performed.

Additionally, Quality Assurance Procedure #7, "Procurement Control" was revised (6/10/81) to delineate the role of Quality Control in procurement. Specifically, Paragraph 3.3.3 states, "Quality Control shall assess and verify that specifications or drawings, do not detrimentally affect inspection and accept criteria." Further, Paragraph 3.3.5 states, "Quality Control shall assure that specific QC requirements are included, such as:

- a. Test samples, including those to be tested by the supplier and those sent to ENC;..."

ENC believes that the above changes, which were effective subsequent to the subject purchase order, provides improved assurances that such changes are receiving appropriate approvals for purchase orders placed after the implementation period of the QAP. This nonconformance did not impact product quality.

### Nuclear Regulatory Commission Notice of Nonconformance:

- C. Quality Assurance Procedure No. 10, Inspection, Test Control and Operating Status, Revision 1, Paragraph 3.3.4 requires formal release of materials at hold points such as receiving inspection. In the event that required tests are outstanding then a conditional release is issued.

Contrary to the above, ...(several fuel clad lots)... were given a full release although the supplier's Contractile Strain Ratio testing had not been completed for that purchase order. This testing was to be done on the first and last lots specifically, and the balance of testing distributed in between. The seventh and last lot had not been shipped by the supplier but had been sampled at the time of this inspection.

ENC Response:

The current purchase order/specification requires the vendor to perform R-values tests from the first part, middle, and end of production quantities and record the average results. Consequently, ENC could not get the vendor's result as soon as the values were needed. Thus, ENC performed overchecks at the beginning of the purchase order shipment that verified that the requirement for the R-value of the ENC received material was acceptable. On this basis, the lots of cladding were released by Quality Control. Subsequent to the audit, the vendor's R-values have been received, evaluated and found acceptable to specification requirements.

ENC is revising the R-value requirement to provide adequate testing of the attribute consistent with operations. This action will be completed by February 28, 1982. This nonconformance did not impact product quality.