



HOKE INCORPORATED

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January 15, 1991

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

REPLY TO NOTICE OF VIOLATION
DOCKET NO.: 99901205/90-01

1) VIOLATION

..."Hoke Quality Instruction HQI-147...Rev. B, dated, April 19, 1989, provides for evaluating or notifying licensees or purchasers of only those nonconformances affecting a pressure boundary safety related components. Hoke Incorporated procedure HQI-147 failed to address the evaluation of or informing licensees or purchasers of deviations, defined in Section 21.3 "Definitions" of 10CFR, Part 21 as a departure from the technical requirement included in the procurement document. Deviations that affect non-pressure boundary components can create a substantial safety hazard and H.I., may have failed to evaluate them or inform licensees or purchasers of the deviation in order that the licensee or purchaser may cause the deviation to be evaluated."

2) CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED

A Spec/Revision Authorization, SRA number 2048 (attachment #1) has been prepared to completely revise HQI-147 in order to bring Hoke in conformance to the provisions of 10CFR21.

The following line items have been revised:

Section 1.0 Purpose

...reporting by a responsible officer of Hoke, Inc., of "deviations"... (formerly stated as "defects")

Section 2.0 Definitions

Line Item 2.2

Added definition of "deviation" previously not included

Line Item 2.4

Responsible officer definition changed from "CEO" to "Director of Quality"

Section 3.0 Notification

Line Item 3.1

- Addition to include "defect or deviation" in lieu of "nonconformance" only.
- Reporting of defects or deviations takes into account "any defect or deviation" affecting components intended for use in a Nuclear Facility. This was previously stated for "pressure boundary" components only. Under this revised statement, both pressure boundary and non-pressure boundary components will be covered by HQI-147, 10CFR21, and Section 206.
- Changed notification from "CEO" to "Plant Quality Manager." This establishes a more direct line of reporting for hourly employees to report defects or deviations.

Line Item 3.2

Quality Manager reports nonconformances to the Director of Quality.

Line Item 3.3

..!"The Director of Quality or his executive designee shall notify the purchaser..." "This was previously stated as "The President or his executive designee"

Section 5.0

Added statement to include provisions for 10CFR21 and Section 206 training for all employees involved in the manufacture, test and inspection of Nuclear product. This item was not previously addressed in HQI-147.

3) CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS


SRA 2048 has been reviewed, distributed and approved by Plant Quality Assurance functions for Cresskill, Spartanburg, and New England, the Purchasing Department, the Nuclear Order Administrator, the Quality Assurance Manager for Government/Nuclear Products and by the Corporate Quality Assurance designee.

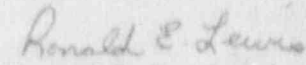
As a result of approval, Hoke Quality Instruction HQI-147, Rev. C, dated 11/13/90, is now in effect. Revision of this procedure assures prevention of future violations of 10CFR, Part 21. (See Attachment No. 2)

4) DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

HQI-147, Rev. C, dated 11/13/90, was effective immediately upon approval by the required departments as listed on SRA 2048. (Nov. 21, 1990.)

Sincerely,


Barry L. Taylor
General Manager


Ronald E. Lewis
Quality Assurance Manager

REL/rjo

cc: Alan R. Herdt, 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

E. Davis - Cresskill, N.J.
R. Johnson - Cresskill, N.J.
R. Williams - Cresskill, N.J.

Attachments*

SPEC./REVISION AUTHORIZATION

 NEW RELEASE

 SPEC. CHANGE

 SRA No. 2148

SHEET OF

REQUEST (INCLUDE REASON):

HQI-147
Rev B to Rev C

- ONLY PARTS CONFORMING TO THE NEW REVISION MAY BE USED.
 - REWORK SCRAP PRESENT STOCK AND IN PROCESS.
- MANUFACTURE TO THE NEW REVISION MAY BE DEFERRED TO THE NEXT MANUFACTURED LOT.
- REVISION DOES NOT AFFECT STOCK OR MANUFACTURING.
- RELEASED FOR PRODUCTION.

ACTION TAKEN (ADD ADDITIONAL SHEETS AS NEEDED):

Complete Document
Revision.

SPECIAL INSTRUCTIONS:

DISTRIBUTION

TO	QTY		SIGN	DATE
	SRA	SPEC.		
MFG ENGR.				
QC-CRESSKILL	1	1		
QC-SPARTANBURG	2	2		
ASSY. DEPT.				
GOVT. SALES				
PURCHASING	1	1		
DRAFTING				
PROJ. ENGR.				
DIR. OF ENGR.				
MARKETING				
P&I-CRESSKILL				
P&I-SPART.				
N.O.A.	1	1		
PROD. SUPT.				
WELDING ENGR.				
WELDING DEPT.				
E. DAVIS	1	1		
K. GUYER	1	1		
K. Busch	1	1		
TOTAL				
PREPARED BY <u>GW</u>	DATE	11/15/90		
REQUESTED BY <u>GW</u>	DATE			
CHANGED BY <u>GW</u>	DATE	11/20/90		
CHECKED BY <u>V. W.</u>	DATE	11/20/90		
<u>AUTHORIZATION</u>				
PROJ. ENGR.	DATE			
DIR. OF ENGR.	DATE			
QC(CRESSKILL)	DATE	11/20/90		
MFG ENGR.	DATE			

SPARTANBURG, S.C.

KILL, NEW JERSEY

JKE INCORPORATED



REPORTING OF
DEFECTS AND NONCOMPLIANCE

HOKE INCORPORATED
CRESSKILL, NEW JERSEY

DATE September 23, 1985

PREPARED - Russell Baker
Manager Q.C.

APPROVED - Joseph J. Gino
V.P. of Eng'g. & Q.A.

APPROVED - William J. Gino
Exec. V.P. & General Mgr.

CHARGE LETTER	DATE	APP'D.	PAGES AFFECTED	REMARKS
--	7/18/86	CB		Reviewed-No change SEE SRA 1430
---	7/22/87	CB	---	See SRA 1578
A	7/22/88	CB	2	See SRA 1708
B	4/19/89	CB	All	See SRA 1870
C	11/13/90		All	SEE SRA 2048

1.0 PURPOSE

To be in compliance with Section 206 of the Energy Re-organization Act of 1974, Public Law 93-438, and the NRC Rules & Regulations Title 10, Chapter 1, Part 21 this procedure outlines the requirements for the reporting by a responsible officer of Hoke Inc. of deviations and noncompliance of components supplied by Hoke for use in Nuclear Power Plants.

2.0 DEFINITIONS

2.1 Defect

A defect is a deviation in the component delivered and/or installed to a nuclear facility, on the basis of an evaluation that the deviation could create a substantial safety hazard.

2.2 Deviation

A deviation is a departure from the technical requirements included in the procurement document.

2.3 Evaluation

The process accomplished by or for Hoke Inc. to determine whether a particular deviation could create a substantial safety hazard.

2.4 Responsible Officer

The Director of Quality or other individual vested with executive authority.

2.5 Substantial Safety Hazard

A loss of safety function to the extent that there is a major reduction in the degree of protection provided to public health & safety.

3.0 NOTIFICATION

- 3.1 Any individual, upon the discovery of any defect or deviation that affects a component intended for use in a nuclear facility shall notify in writing the Plant Quality Manager of the nonconformance.
- 3.2 The Quality Manager shall report the nonconformance to the Director of Quality or his executive designee.

- 3.3 Upon notification of a nonconformance, the Director or Quality or his executive designee shall notify the purchaser of the component and request that he conduct an evaluation to determine if the nonconforming component could cause a substantial safety hazard.
- 3.4 Upon notification from the purchaser that the reported nonconformance could cause a substantial safety hazard, the Director or his executive designee will report the nonconformance to the Nuclear Regulatory Commission as required by NRC Title 10, Chapter 1, Part 21.

4.0 COMMUNICATIONS

All communication and reports of substantial safety hazard nonconformities will be reported by the responsible officer to the Director, Office of Inspection and Enforcement, U.S.N.R.C. Washington, DC 20555 or to the Director of a Regional Office at the address specified in Part 21 of NRD Title 10, Chapter 1.

5.0 TRAINING OF EMPLOYEES - REPORTING OF NONCONFORMANCE

All employees involved in the manufacture, test, and inspection of Nuclear product shall be trained in respect to reporting of nonconformances as defined by this procedure. Such employees shall also be trained to the latest revision of 10 CFR 21 and the Energy Reorganization Act of 1974, Section 206. Training implementation will be the responsibility of the Plant Quality Manager.

6.0 ATTACHMENTS

- 6.1 U.S.N.R.C Rules and Regulations Title 10, Chapter 1, Part 21.
- 6.2 Energy Reorganization Act of 1974 (Public Law 93-438), Section 206.