



January 29, 1991

File Ref: QCG-7847

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

Subject: NRC Inspection Report No. 99900317/90-01

Dear Mr. Potapovs:

We have reviewed the above report and comment as follows specifically with reference to the two nonconformances identified under Section "B" of page 2:

"NONCONFORMANCE:

Criterion V of 10 CFR Part 50, Appendix B specifies that "Activities affecting quality shall be prescribed by...documented instructions, procedures,...of a type appropriate to the circumstances...." Contrary to the above, no policies or procedures were available that documented the Cooper-Bessemer (C-B) process for classifying diesel engine parts for safety-related service. This includes the lack of documented evidence for each diesel part previously classified regarding the criteria and related considerations that were relied upon to arrive at classification decisions. Also, no procedure was available to guide the review of incoming purchase order documentation to assure that the proper classification was assigned to the requested part prior to supplying the part (90-01-01)."

Resolution of "Parts Classification" Issue:

Attached please find a copy of an internal memo (to C-B) from J. M. Horne to W. H. A Lambert dated January 11, 1991 with the subject "NRC Inspection Report 99900317/90-01. This memo details our Engineering Departments plan of action and is self-explanatory.

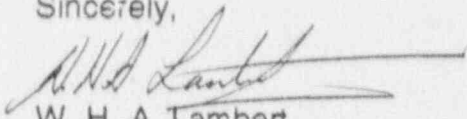
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Resolution of "Purchase Order Review":

Attached is an uncontrolled copy of a new procedure QCP-07-02 Rev. 0 entitled "Aftermarket Services Handling of Spare Parts Orders". This procedure will be formally distributed to all holders of controlled copies of Quality Control Procedures (QCP's) by February 15, 1991.

Sincerely,



W. H. A. Lambert
Manager of Quality Assurance
and Nuclear Operations

WHAL:kil

Attachment (All)

cc: A. E. Bice
D. T. Blizzard
J. M. Horne
B. R. Sedelmyer
V. J. Skrypski
F. B. Stolba
W. P. Haass - NRC

COOPER-BESSEMER RECIPROCATING

Date: January 11, 1991
To: W. H. A. Lambert
From: J. M. Horne
Subject: NRC Inspection Report 99900317/90-01



This report indicates we do not meet the requirements of Criterion V of 10 CFR 50 Appendix B, in that we do not have written procedures describing the process of determining the appropriate safety classification of replacement parts, nor do we have documentation showing the criteria, logic etc. that were used to determine the present part classifications. In order to correct this nonconformance, the following actions must be undertaken by Engineering:

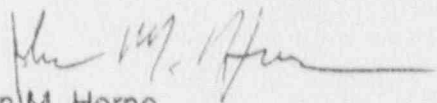
TASK	DESCRIPTION
A.	Develop a written procedure which describes the process of determining which characteristics of an assembly or part are critical to the function of the engine in emergency mode. This will include a Failure Modes and Effects Analysis (FMEA).
B.	Develop a written procedure which describes the requirements for documenting the results of the FMEA and the critical characteristics of a part.
C.	Perform the FMEA and determine and document the critical characteristics of all engine components which C-B presently considers to be critical (safety related).
D.	Perform and document an FMEA for all other assemblies on the engine, and modify the classification of any parts found to require a change.

W. H. A. Lambert
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Our present schedule for accomplishing these tasks is:

TASK	MILESTONE	DATE
A.	First draft of procedure.	2/15/91
	Final version of procedure.	3/08/91
	Procedure approved and issued.	3/22/91
B.	First draft of procedure.	3/01/91
	Final version of procedure.	3/15/91
	Procedure approved and issued.	3/29/91
C.	Begin documentation process.	4/01/91
	Complete documentation.	4/01/93
D.	Begin evaluation and documentation process.	4/01/93
	Complete documentation	6/30/94

While this schedule is based on certain assumptions as to the time required to accomplish this major task, I feel it is realistic and cannot be improved significantly unless additional engineering manpower can be committed to the project.



John M. Horne

CC: A. Bice
D. T. Blizzard
B. R. Sedelmyer
F. B. Stolba

JMH/jld*