

GOLDEN GATE SWITCHBOARD CO.
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NAPA, CALIFORNIA 94558

June 15, 1994

U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attn: Document Control Desk

Subject: Response/Notice of Violation and
Notice of Nonconformance
NRC Inspection Report No. 99901271/94-01

Gentlemen:

We offer the following responses to the subject report dated 5/17/94:

Violations 94-01-01 and 94-01-02:

Previously closed. No response requested.

Nonconformance 94-01-03:

Enclosed are excerpts from revision 15 to the GGS Quality Assurance Manual. We direct your attention to Section I, "Organization", Paragraph I.D.3.j and Organization Chart. Other sections of the QA Manual have been revised to accommodate this organizational change. By virtue of this revised manual the Inspectors and Testers now report directly to the QA Manager both technically and administratively, effective 6/15/94. The change in Golden Gate Switchboard organization will prevent recurrence of finding 94-01-03.

Nonconformance 94-01-04:

Because of the uniqueness of individual switchgear on each project, it is GGSCo's philosophy to develop and perform complete seismic qualification testing for each Nuclear Class 1E project. This includes the fabrication and assembly of a complete unit used solely for seismic qualification for each project.

In dedicating items for safety related use, GGSCo specifies the requirement for those items used on the qualification units and the same items used on production units to be homogenous. Establishment of homogeneity supports the application of seismic

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qualification test results to the production units.

In order to establish homogeneity, receipt inspectors are provided with written instruction in the dedication package to visually inspect the batch of items used for a project (production and qualification units). Where Engineering determines appropriate, weight is measured to further establish material homogeneity. In addition, other characteristics specified in the dedication testing are measured in part to support homogeneity. These include such characteristics as relay minimum pick-up, breaker closing time and current transformer excitation current, etc.

A majority of the dedication inspection packages require specific attributes to be examined for homogeneity. As an example, the following is an excerpt directly from the dedication test report DTF.3129-51 for dedication of potential transformer primary connection fingers.

CRITICAL CHARACTERISTICS TO BE VERIFIED BY INSPECTION

Sample Size: (X) 100% () _____

(iv) Characteristic: **BATCH HOMOGENEITY**

How verified: **VISUAL INSPECTION AND WEIGHT**

Acceptance criteria:

VISUAL COMPARISON BETWEEN THE SAME COMPONENTS OF ALL THE ITEMS IN EACH BATCH MUST LOOK THE SAME AS FAR AS COLOR, SHAPE, TEXTURE, SURFACE FINISH, AND HOMOGENEITY OF THE ABOVE CHARACTERISTICS.

ALL FINGERS WEIGH WITHIN 5% OF EACH OTHER.

This inspection, along with other configuration requirements sufficiently establish homogeneity.

Inspections to establish homogeneity vary depending on the item and application but are adequate to establish homogeneity. In order to ensure complete and consistent application of the requirements the following measures will be/have been taken.

- ▶ One system has been established for the dedication of items for safety related use.

At the time of the NRC inspection, two technically acceptable methods were being implemented for dedication. GGSCo has opted to implement the DTR method (as was used on the Calvert Cliffs project) on all future nuclear projects. This will assist in maintaining consistency and the overall effectiveness of the dedication effort.

- ▶ Quality Assurance Procedure QP2036, Dedication of Commercial Grade Items, will be revised to discuss the underlying reasons for establishing homogeneity. This procedure will be revised to indicate that Engineering shall determine when items are to be supplied with the same batch/date code or sequential serial numbers. Provisions will be provided in the procedure for the purchase of commercial grade items, QP2006-2, to incorporate batch/date code or sequential serial number requirements into purchase orders. This will be complete by July 7, 1994.
- ▶ Training will be given to Engineering personnel involved with the preparation of DTRs on the expected level of detail and requirements of homogeneity. Training will include a discussion of the reasons for specifying that items have the same batch/date code or sequential serial numbers, and will be complete by July 10, 1994.
- ▶ Training will be given to Shop Inspection personnel on the requirements of homogeneity. Training will include the reasons underlying (or theory) for establishing homogeneity, expectations of Engineering and the necessity to not limit inspection to the attributes listed in the DTR. This will be complete by July 10, 1994.

Nonconformance 94-01-05:

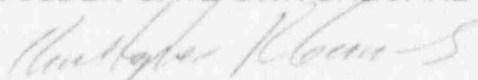
Parts and assemblies in the shop have been properly identified in the shop.

In order to prevent recurrence of finding 94-01-05;

- ▶ GGSCo has revised procedure QP2008, "In Process Inspection Procedure". We direct your attention to Paragraphs III.3 and 4. The implementing checklists have also been updated.
- ▶ Training will be provided to Shop Inspection personnel on the requirements of the revised procedure and proper use of the implementing checklists. This will be complete by July 1, 1994.

Very truly yours,

GOLDEN GATE SWITCHBOARD CO.


Christopher R. Connors

RCJ:bh

Enclosures

CC: L.J. Norrholm, Chief

VIB, Division of Reactor Inspection
and Licensee Performance