

U. P. 1983

MEMORANDUM FOR: J. Taylor, Director, Division of Quality Assurance, Safeguards, and Inspection Programs, IE
FROM: R. L. Bangart, Director, Division of Vendor and Technical Programs, Region IV
SUBJECT: REQUESTED GUIDANCE FOR INSPECTION OF VENDORS NOT COMMITTED TO APPENDIX B OF 10 CFR PART 50 OR 10 CFR PART 21

A Vendor Program Branch (VPB) inspection was conducted at the Engine and Turbine Controls Division of Woodward Governor Company (E&TCD-WGC) during the period of November 29-December 3, 1982, in response to a request from Region III concerning the failure of a diesel generator governor at Palisades (AITS No. FO3034682). Details of the inspection are contained in the attached VPB Inspection Report No. 99900759/82-01.

Devices manufactured by E&TCD-WGC are sold as catalog items and are used to control the speeds of emergency diesel generators and feedwater pump turbines. Other Class 1E applications of the devices are not currently known by the VPB. The E&TCD-WGC program does not comply with 10 CFR Part 21 or 10 CFR Part 50, Appendix B; further, they have no intention of structuring their program for compliance. E&TCD-WGC has taken "specific exception to any quality requirements(s) imposed or implied . . . that are in conflict with or not directly interchangeable with . . . MIL.-Q-9858A (sic)." This position and the absence of imposition of 10 CFR Part 50, Appendix B in licensee and nonlicensee procurement documents precluded the issue of Notices of Nonconformance with NRC requirements for the numerous deficiencies identified during the inspection.

It is acknowledged that 10 CFR Part 21 permits procurement of catalog items for incorporation into a basic component and subsequent dedication by the manufacturer. What concerns us in this regard are those catalog items which perform specific safety-related functions in equipment and whose failure could result in total equipment failure; e.g., governor failures on diesel engines can produce a diesel overspeed condition which may ultimately result in engine failure. An additional factor for consideration is that the generic scope of defective catalog items would not normally be reported to the NRC under 10 CFR Part 21 in that the reporting licensee or component manufacturer would usually not have such information.

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R&CPS UP
WEFoster/rc
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SC:R&CPS UP
JBarnes
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BC:VPB UP
UPotapovs
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D:V&T/PB
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RA:RIV
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While a VPB inspection has not been conducted at the Electro-Motive Division of General Motors Corporation (EMD-GM), a similar status would appear to exist with respect to acceptance of 10 CFR Part 50, Appendix B and 10 CFR Part 21 in procurement documents. Diesel engines manufactured by EMD-GM are used in nuclear generating stations; however, available information indicates that neither 10 CFR Part 50, Appendix B nor 10 CFR Part 21 are accepted from customers by the engine manufacturer.

Accordingly, it is requested that a review be performed by IE of this subject and appropriate guidance developed for VPB utilization in consideration and planning of future similar inspections.

Should you have any additional questions or require further information on this inspection, please contact W. E. Foster (728-8179) or I. Barnes (728-8176).

Original Signed By:
Richard L. Bangart

Richard L. Bangart, Director
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VPB 3065 File
VPB 7010 File
P. S. Check
B. Brown