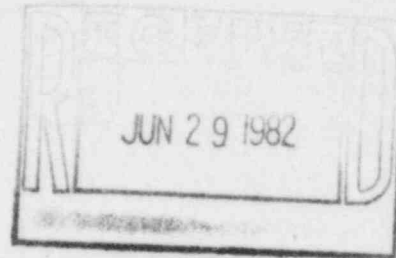


June 25, 1982

U. S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Attention: Vldis Potapovs
Chief, Vendor Programs Branch

Subject: Dravo Corporation
Docket No. 99900017/82-01



Gentlemen:

Your letter of May 26, 1982, under the above subject, transmitted the results of your inspection of our facility on March 29 thru April 2, 1982. The two items of nonconformance found by your inspectors are discussed below.

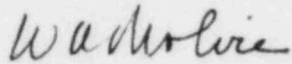
- A. Nonconformance: Weld Joint Data Cards for the attachment of nameplates to certain assemblies had been signed off by the Weld Foreman as complete prior to the performance of the work.
1. Space is provided on the Weld Joint Data Card for sign off by the Shop Foreman for inspect fit-up, check preheat, inspect weld and removal of temporary backing. These items are not applicable to the routine attachment of code plates in the same sense that they are for a girth weld or a nozzle weld where the parameters to be observed could have wide variations. In the instances cited, the Foreman completed the Weld Joint Data Card because the inspections and verifications are not meaningful for attachment of code plates.
 2. The Shop Foremen have been instructed to insert the words "not applicable" in the spaces reserved for his inspection or verification or to leave the space blank.
 3. Final inspection, including NDE, is performed by our Inspection personnel so that this matter has no impact on the quality, safety or reliability of the fabrication.
- B. Nonconformance: Corrective action implementation date and verification follow-up were not documented on a nonconformance report written during an internal audit of Shop Production welding.
1. A review of the correspondence file for this internal audit reveals that the review by QA was performed and documented, but not on the NCR (see attached Dravo Internal Correspondence dated 7-23-79, 8-3-79, 11-26-79 and 12-7-79). The follow-up however was not completed within the 10 days required by the manual which was a part of your finding.

U. S. Nuclear Regulatory Commission
Page 2
June 25, 1982

2. In January 1980, we started a monthly review of all open NCR's and established a central file (in addition to the contract file) and maintained the open NCR's separate from the closed NCR's. This has enabled us to provide closer follow-up on completion of NCR's. A review of nonconformances written since that time shows that we have improved our processing and maintained the time schedule required in our QA Manual.

Very truly yours,

DRAVO CORPORATION
Pipe Fabrication Division



W. A. Molvie
Manager Quality Assurance
& Technical Services

WAM:js

Enclosures

Internal Correspondence

To	<u>E. Reno</u>	Location	Q. A.	Date	8-3-79
From	J. Seddon	Location	Production	Page No.	1 of 2
Subject	Q/ A. AUDIT LETTER OF 7/23/79				

cc: D. Adelsperger
M. Chandler
E. Dysert
W. Molvie

P. Norris
G. Schwab
E. Stilgenbauer

After investigating the findings pointed out in the letter of 7/23/79, the problems have been corrected as indicated. The steps shown to prevent the reoccurrence have all been implemented.

FINDING I NONCONFORMANCE REPORT #2936 QA52

The joint in question has been cut apart, refit and welded. In the future, stainless sketches for the hot wire wig will be handed out in groups that require the same wire. This means that on daylight the welder at the machine may have more than one sketch but they will all require the same wire. On 2nd trick, he may have packs of sketches that require different wires but they will be clipped together by type of wire and so indicated. This will help the welder but it is still his responsibility to use the proper wire when welding a joint. The subject was discussed with the welders at a meeting on 7/24.

FINDING II NONCONFORMANCE REPORT #3219 QA1

The WJDS was corrected by the rod man. The rod man was reinstructed that the WJDS must show the rod being used.

FINDING III NONCONFORMANCE #3035 QA84

The shop foreman prepared a WJDS and put it in the sketch package. The foremen have been made aware of the importance of having paper for all attachments. The welders in Shop 3 were instructed on 7/30 on the importance of this procedure. At the safety meeting on 8/7, everyone will be reminded of this requirement.

DESIGNATED ORIGINAL
Certified By Rheanne Jouts
RECEIVED
DRAVO CORPORATION

AUG - 3 1979

QUALITY ASSURANCE
DEPARTMENT

Dravo

Internal Correspondence

To See Below Location Various Date 11/26/79

From R. L. Miller Location QA Page No. 1

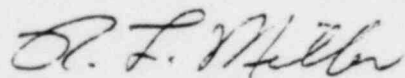
Subject : Audit of Weld Engineering & Production Welding (7/16-20/79)

cc: G. Schwab J. Seddon
W. A. Molvie E. Stilgenbauer
D. L. Adelsperger M. Chandler
P. Norris
E. Dysert File ✓

I have received and evaluated the responses from Messers Seddon and Norris to the subject audit. I am pleased to inform you that we find the responses satisfactory to close out all the findings.

By the way of explanation, our QA Manual has been revised to eliminate the discrepancy reported in finding V.

We will conduct a verification audit on or before December 7, 1979, as required by NQAM REV. 1 paragraph 15.2.3.



R. L. Miller
Quality Assurance Engineer

RLM/blw

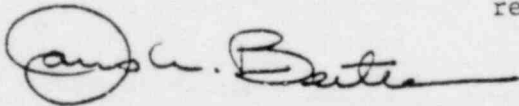
Internal Correspondence

To	See Below	Location	Various	Date	12/11/79
From	James M. Bertram	Location	QA	Page No.	1
Subject: Re-Varification Audit of Weld Engineering & Production Welding					

cc: G. Schwab E. Stilgenbauer
 W. A. Molvie M. Chandler
 D. L. Adelsperger [REDACTED]
 P. Norris E. Reno
 E. Dysert
 J. Seddon File

On December 7, 1979, I conducted a varification audit of Weld Engineering & Production Welding as required per NQAM REV. 1, Para. 15.2.3.

1. Findings 1, 2, 3, & 4: All applicable NCR's have been dispositioned and cleared through the system.
2. Finding 5: NQAM (9.4.11) has been revised to eliminate this discrepancy.
3. Finding 6: As the machines need re-calibration the new stickers are being used with calibration & re-calibration dates. (Took random walk through shop with P. Norris to verify).
4. Finding 7: The use of the "welder process usage" forms are now consistant between all shops.
5. Finding 8: The "plasma-arc overlay machine" has stenciled on machine; "not for use on nuclear fabrication, calibrated meters are required". (Verified with P. Norris)



James. M. Bertram
 Quality Assurance Technician

JMB/blw

Internal Correspondence

To	See Below	Location		Date	7-23-79
From	R.L. Miller & E. Reno	Location	Quality Assurance	Page No.	1
Subject	QA AUDIT OF WELDING ENGINEERING & PRODUCTION WELDING				

cc: G. Schwab
W.A. Molvie
D. Adelsperger
P. Norris

E. Dysert
J. Sedden
E. Stilgenbauer
M. Chandler

During the week of July 16, 1979, Ed Reno and myself conducted QA's annual Internal Audit of Welding Engineering & Production Welding. Of the eight findings and one comment, four findings were serious enough in nature to require the generation of Nonconformance Reports.

814 Finding 1 - The Audit Team observed weld joint "H" on Sketch E2936-418 being welded using W249 wire. This wire is not approved for use on this contract. The WJDS indicated that X185 wire was being used.

See Nonconformance Report #2936 QA52

814 Finding 2 - The Audit Team observed weld joint "C" on Sketch E3219-35 being welded using X108. The WJDS indicated that X200 was being used. Checking the FML and welding procedure it was determined that X108 was an acceptable and approved wire. The WJDS was corrected by the Rod Man (L.H.) to reflect the wire being used.

See Nonconformance Report #3219 QA1

814 Finding 3 - The Audit Team observed the tempory attachments being cut off the flange on spool E3035-1105 which held the fabrication to the fixture. The Shop 2 Foreman was unable to produce a WJDS for the attachments of these straps. We were told that the WJDS would be prepared and inserted into the sketch package.

See Nonconformance Report #3035 QA84

814 Finding 4 - The Audit Team observed that the flow meter for the purge gas indicated 50 cfh during the welding of spool E2936-414 weld "B". Weld Procedure 1-8-W6104-GL5 Rev. 5A was being used, which specifies a purge rate of 10-20 cfh.

See Nonconformance Report #2936 QA53