

Velan Valve Corporation

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Williston, Vermont 05495

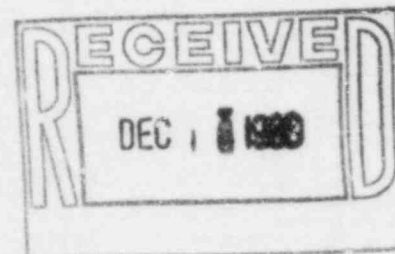
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VELAN

December 13, 1983

United States Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011



Attention: Uldis Potapovs, Chief
Vendor Program Branch

Subject: The inspection conducted by Mr. J.T. Conway on
September 12-16, 1983.

Reference: Docket No. 99900346/83-01

Gentlemen:

We have reviewed the violation and non conformances noted in the report resulting from the subject inspection and offer the following corrective actions.

Appendix A (violation)

A copy of 10CFR part 21 with an effective date of 22 Aug. 1983 was posted at two locations in the plant. The copy was obtained from the University library and arrangements have been made to contact the library every three months, starting in March 1984, to ensure the correct copy is obtained and posted.

Appendix B (non conformances)

- A. Copies of all the Field Service Reports related to the jamming disc on the 2½" stop check valves have been given to the Engineering Supervisor at Plant 3. To prevent recurrence the Corporate Manager of Engineering has instructed the Field Service Representatives to send copies of all their reports directly to the Engineering Supervisor at Plant 3.
- B. Employee No. 70; R. Cuenin was qualified in 1980 for limited NDE certification in PT under the provision of procedure VEL-QCI-565. Under this type of qualification Mr. Cuenin was not permitted to perform acceptance inspections. He worked for the manufacturing department and did preliminary inspections only. Under the above circumstances an eye examination was not required.

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MEMBER OF VALVE MANUFACTURERS ASSOCIATION (VMA)



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For employee no. 86, R. Weston and the Q.C. Manager D. Winton, their eye examination renewals were overlooked and performed late. In both cases the results showed that their eyesights were acceptable ensuring that examinations they performed were valid.

To prevent recurrence a file has been set up for all personnel requiring eye examinations; to notify their supervisors approximately one month ahead of the required date of the eye examination.

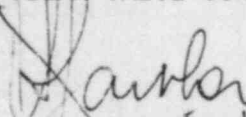
- C. All the personnel mentioned in this non conformance with the exception of Mr. Gaudette #88, have been trained and their training files have been updated. Mr. Gaudette resigned on August 26, 1983 and is not available for training. To prevent recurrence the Vice President Q.A. has issued a memo to the supervisors concerned reminding them of their responsibility to perform training in a timely manner in future.
- D. Due to the ASME interpretation that suppliers of calibration services do not have to be audited by the holder of the Certificate of Authorization ('N' Stamp) the company did not set up a formal plan for the approval of such suppliers. Calibration supplies were selected by the Metrologist and the purchase order for calibration services were reviewed and approved by the Q.A. Department.

Approximately four months ago a program was started to approve calibration suppliers and three have been audited to date. A procedure detailing the various methods that may be used to qualify and approve suppliers of calibration services is being written and is scheduled to be completed by December 31, 1983.

- E. The requirement called out in procedure VELW-QC-156.2 paragraph 2.3 is incorrect and in conflict with VELW-QC-156.16 paragraph 9.1 which states in part "When NDE is subcontracted the company Level III Examiner shall review and approve all subcontractor NDE procedures and verify that the personnel are qualified to the requirements of SNT-TC-1A (1980) and the Code". The Level III is performing all the reviews. Procedure VELW-QC-156.2 para. 2.3 will be revised to reflect actual practice at the Manual's next revision which will most likely occur during our ASME survey for renewal of our 'N' and 'NPT' Certificates of Authorization in early April 1984.

We trust that our responses are acceptable. If there are any questions please feel free to contact us.

Sincerely,
VELAN VALVE CORPORATION


E.I. François
Vice President, Quality Assurance

EIF/atq