

# GENERAL ELECTRIC

NUCLEAR ENERGY  
ENGINEERING  
DIVISION

GENERAL ELECTRIC COMPANY, 175 CURTNER AVE., SAN JOSE, CALIFORNIA 95125

December 14, 1983

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

Attention: Uldis Potapovs, Chief  
Vendor Program Branch

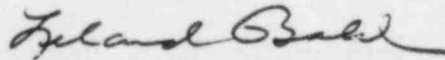
Reference: NRC Letter - Docket No. 99900911 83-03 - November 17, 1983

Dear Mr. Potapovs,

This letter is in response to your November 17, 1983, letter which contained the results of the NRC inspection of the Nuclear Energy Business Operations facilities at Valley Forge, Pennsylvania, and San Jose, California, conducted during September, 1983. Mr. Bruggeman has requested that I respond to your letter in his behalf.

The report identifies two nonconformances. The statement of each nonconformance and our response is contained in Attachment 1.

Sincerely,



L. S. Bohl, Manager  
Quality Assurance & Reliability Operation  
Mail Code 310

LSB/km

Attachment

cc: WH Bruggeman  
JM Case  
JJ Fox

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PDR QA999 EMVGENE  
99900911 PDR

NONCONFORMANCES AND RESPONSESB. NONCONFORMANCES:

1. Contrary to TR NEDO-11209-04A, Revision 4, dated December 31, 1982, and Engineering Work Authorization (EWA) no. EAJ08-23, Revision 0, issued March 21, 1983, there was no documented objective evidence that out-of-specification conditions for baseline functional data, thermal aging calibration data, and radiation aging data (recorded for CO3 temperature elements tested under Test Plan and Procedure [TP&P] 524.1020, Revision A, dated May 11, 1983) were documented or that the test requestor had been notified of the out-of specification conditions.
2. Contrary to TR NEDO-11209-04A, Revision 4, dated December 31, 1982, and paragraph 4.7.7 of NEDE-24326-1-P, dated January 1983, there was no documented objective evidence that the single application of the initial accident transient and dwell at peak temperature, as required by Attachment 1 to EWA No. EAJ08-23, Revision 2, issued June 20, 1983, had been justified for the CO3 temperature element qualification tests.

RESPONSE TO NONCONFORMANCE 1

To correct this noncompliance with Procedure TOP QA-9, "Nonconformance Report", the NEBO Test Operation has implemented a deviation log to record and document any nonconformance when observed. In addition, a nonconformance report has been issued to formally document the out-of-specification conditions and the corrective action. These actions have been discussed with the affected test personnel.

The above corrective and preventive actions were implemented before September 30, 1983, and were reviewed with the NRC inspector during the inspection.

The improved procedures are expected to prevent recurrence of this type of nonconformance.

RESPONSE TO NONCONFORMANCE 2

The essence of the nonconformance is the failure to justify the use of only a single accident transient and dwell at peak temperature instead of the recommended two transients and dwells in NEDE-24326-1-P, "General Electric Environmental Qualification Program", for the CO-3 temperature element qualification test EWA. Although the test had not yet been performed and was on "hold" pending resolution of other problems, we accept the possibility that the mistake might have slipped through the review prior to final report issue. We have taken or will take the following corrective and preventive actions.

Corrective Action: The EWA (EAJ08-23) will be revised by January 4, 1984, to include the requirement for a double accident transient and dwell at peak temperature.

Actions to Preclude Recurrence: A memorandum containing clarification of the requirement in NEDE-24326-1-P was issued November 28, 1983, and sent to the Managers of the qualification program for distribution to their personnel.