

CONTROL PRODUCTS DIVISION
AMERACE CORPORATION, 1000 HICKORY STREET
GRAFTON, WISCONSIN 53024 (414) 377-0800



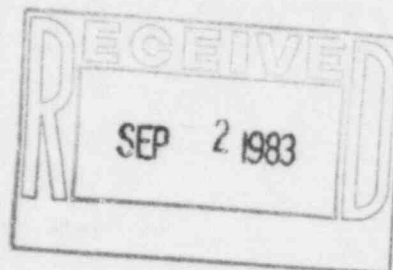
August 31, 1983

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

Attention: Uldis Potapovs, Chief

Reference: Docket No. 99900296/82-01

Gentlemen:



The following is provided in response to your letter of July 14, 1983, requesting additional information:

ITEM A - That we responded to a finding in a different way than we had originally said we would. Sometimes reply dates are requested before corrective action can be implemented. It is possible for conditions to change between an original response and a completed action. There is no way anyone could guarantee that this will not happen in the future. Therefore, on all future cases we will advise you only of our intended action and hold all items open until final action has been completed. You will then be advised of the completed action.

ITEM B - Translating unique customer requirements. Sales/Marketing Procedure 601, effective April 1, 1983, covers the review and transmittal of customer requirements to operating disciplines.

1. "Translating unique customer requirements into a commercial catalog part." Do your statements and example ("critical part to the successful operation of standby diesel engine generator sets in nuclear power plants") mean that you feel we should have interpreted the purchase orders from Cooper Energy as "Nuclear Safety Related"? We have questioned Cooper Energy on their requirements in the past, and they have told us that some orders which go into nuclear plants are not "Nuclear Safety Related". The statement you use in your example has appeared on

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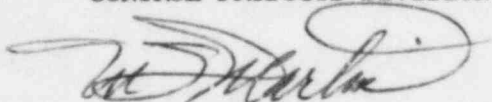
Cooper Purchase Orders and Cooper has told us the relays ordered will not be required to be furnished as "Nuclear Safety Related" and that they do not want traceability. We are in the business of providing nuclear traceable units. There is certainly no reason for us not to do so, if that is what the customer requires. But if they tell us that the application is not nuclear safety related, or if they choose to dedicate the relays at some point after they take possession, we are not in a position to contradict their engineering judgement. I have attached our recent correspondence with Cooper Energy and a copy of their drawing, marked-up and signed by us, which we send with each Cooper order. We have no written reply from Cooper Energy. When I discussed this with Mr. Foster, he could not say that "critical in a nuclear power plant" means "nuclear safety related", although from your statements, apparently Cooper Energy told him that it did. To preclude further misunderstanding, please state exactly what words are equivalent to "Nuclear Safety Related" or "10CFR21 applies", and where this is documented. We will then provide statements to our customers in a service bulletin and in response to any orders which may be in question. Also if there are particular relays which you feel have been dedicated by Cooper Energy to be under 10CFR21, please indicate exactly which these are and exactly what words require 10CFR21 to apply. We will then notify Cooper Energy that these relays must be returned to us to be up-graded to nuclear grade so that traceability can be provided.

2. Non-accomplishment of tasks. PS100 revision (effective April 1, 1983) mentioned in the March 17, 1983, reply, has been released and is attached. The 7000 Audit Test Procedure, ATP-TRE-01, has also been revised (effective April 8, 1983) and is attached. Paragraph 1 now states that all shipments.... will be sent to QA for review, possible audit, and traceability recording as appropriate.

- ITEM C - Audit data sheets. The 7000 series audit data sheet has been revised (now form EN 262, effective 4/83). A statement has been added to ATP-TRE-01 (effective 4/83) that all non-applicable empty blanks on the data sheet should be marked N.A.
- ITEM D - EN 102 has been revised (effective 2/83) to require calculations for all "E" time ranges. A copy is attached. Test and lead people have been instructed on the proper method of completing the EN 102 form. A memo confirming this is attached.
- ITEM F - As stated in our previous reply, the disposition of the material in question was to use (some) "as is" employing standard assembly methods. Please state what criterion requires a defective material report to be on workstation when using accepted material and standard assembly methods.

Sincerely,

CONTROL PRODUCTS DIVISION


M. Q. Martin
Quality Assurance Manager

cc: D. Alexander
R. Bertling
B. Newman

- Attachment(s):
- (1) Cooper Energy Drawing Mark-Up (4/18/78)
 - (2) Cooper Energy Drawing Mark-Up (1/19/83)
 - (3) PS100
 - (4) ATP-TRE-01
 - (5) EN 262
 - (6) EN 102
 - (7) Memo from H. Wenzel
 - (8) Sales/Marketing Procedure 601
 - (9) QA 82190
 - (10) Memo from D. Alexander (1/7/83)
 - (11) Memo from D. Alexander (2/10/83)