



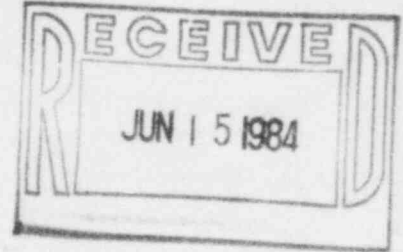
ATWOOD & MORRILL CO., INC.
DESIGNERS AND MANUFACTURERS SINCE 1900

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June 12, 1984

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



Attention: Mr. Uldis Potapovs, Chief
Vendor Program Branch
Division of Quality Assurance
Safeguards, and Inspection Programs

Subject: NRC Inspection of the Atwood & Morrill Facility
April 2-5, 1984

Reference: NRC Report Dated May 14, 1984

Gentlemen:

This letter is in response to the items identified as nonconforming in the referenced NRC report.

ITEM A:

Atwood & Morrill's ASME Section III Quality Assurance Manual (QAM), addresses the controls for Code items. The heat treating services procured from the referenced vendors were heat treatments of valve shafts. Since valve shafts are specifically excluded from the rules of ASME Section III, we do not feel that Item A is a nonconformance.

Although retention of heat treat records for the valve shafts in question was not a requirement typical documentation such as procurement documents, certificates of compliance, heat treat records, heat treat charts and furnace calibration and survey records for services of this type were presented to the NRC team. It was our opinion that these records demonstrated that at the time such services were performed, an appropriate level of assurance consistent with the function of the part in the valve was achieved.

ITEM B:

A&M's QAM paragraph 6.6 states in part that "Standard procedures involving uniform handling of activities, such as, material marking, identity, receiving inspection, NCR processing, and weld material control are maintained at shop work centers in binders with indices."

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ITEM B: (continued)

Since these standard procedures are applicable to all nuclear valves they are not referenced on Shop Process Orders but are used by employees as a routine part of processing all nuclear orders. The standard procedure for torquing of bolts is located in the work center file adjacent to the assembly department.

A&M will take the following actions to assure proper use of work center files and specifically the standard bolt torquing procedure:

1. A general instruction will be issued within thirty days to all production personnel instructing them in the use of work center files.
2. Assembly instructions will be prepared as explained in Item C below. Use of bolt torquing procedures will be incorporated into these instructions.

Finally, we would like to offer that an acceptable hydrostatic test is the ultimate verification of acceptable bolt torque.

ITEM C:

At the present time the experience of A&M's assembly personnel range from one to twenty-six years with an average of thirteen years. To date their "how to" training has consisted of on-the-job training.

However, to strengthen this area, within sixty days assembly instructions will be prepared for currently active nuclear product lines. These assembly instructions will be used in training all assembly personnel.

ITEM D:

Failure to include the packing removal requirement in the applicable procedure has been reviewed with the personnel responsible for procedure preparation and review.

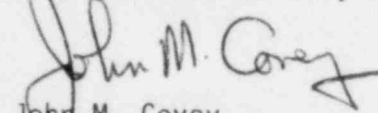
Specifically in response to Sales Order 15159, the packing requirement had been identified and documented in the Sales Order Write-Up. The approved Sales Order Write-Up had been distributed to the Assembly and Test Department and the Quality Control Department for use during assembly, test and final inspection activities. Atwood & Morrill was in compliance with packing specification requirements on this order.

United States Nuclear Regulatory Commission
Mr. Uldis Potapovs
June 12, 1984
Page Three

Should you have any questions relating to this response or need any further information in regard to the inspection, please do not hesitate to contact us.

Very truly yours,

ATWOOD & MORRILL CO., INC.



John M. Covey
Quality Assurance Manager

cc:

R.A. Genier - V.P. Operations
S.M. Shields - V.P. Engineering
F.A. Crippen - V.P. Manufacturing
C.A.C. - M.D. Lyons