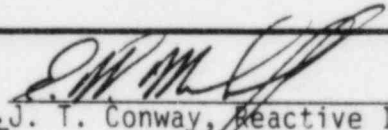



ORGANIZATION: POWELL ELECTRICAL MANUFACTURING COMPANY
HOUSTON, TEXAS

REPORT NO.: 99900885/85-01	INSPECTION DATE(S): 1/14-18/85	INSPECTION ON-SITE HOURS: 28
CORRESPONDENCE ADDRESS: Powell Electrical Manufacturing Company ATTN: Mr. A. L. Chamberlain, President Post Office Box 12818 Houston, Texas 77017		
ORGANIZATIONAL CONTACT: Mr. J. R. Dulany, Quality Assurance Manager TELEPHONE NUMBER: (713) 944-6900		
PRINCIPAL PRODUCT: Motor Control Centers, Switchgear, and Power Control Rooms NUCLEAR INDUSTRY ACTIVITY: Class 1E nuclear equipment for calendar year 1984 consisted of 4 fuse cabinets for Seabrook nuclear facility.		
ASSIGNED INSPECTOR:  For J. T. Conway, Reactive Inspection Section (RIS)		<u>3/13/85</u> Date
OTHER INSPECTOR(S): E. MacDougall, Consultant		
APPROVED BY:  E. W. Merschoff, Chief, RIS, Vendor Program Branch		<u>3/13/85</u> Date
INSPECTION BASES AND SCOPE: A. <u>BASES</u> : 10 CFR Part 50, Appendix B and 10 CFR Part 21. B. <u>SCOPE</u> : The purpose of this inspection was to conduct a programmatic evaluation of the implementation of the QA program in the areas of procurement control, document control, control of purchased material and services, testing, audits (external), and reporting of defects.		
PLANT SITE APPLICABILITY: Standby 480-V Load Centers - River Bend (50-458/459); 480-V Switchgear - Salem (50-272/311)		

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REPORT
NO.: 99900885/85-01

INSPECTION
RESULTS:

PAGE 2 of 9

A. VIOLATIONS:

1. Contrary to Section 21.6 of 10 CFR Part 21, copies of 10 CFR Part 21, Section 206, and procedure QC-Misc-2 "Regulations of 10 CFR 21" were not posted.
2. Contrary to Section 21.31 of 10 CFR Part 21, a review of 20 purchase orders (PO) to vendors of electrical components used on the 480-V load centers (Unit 1A and Unit 1B) for the River Bend Station, Unit No. 1 revealed that PO 61650-29 dated April 27, 1983 to AMP Special Industries for connectors did not specify that 10 CFR Part 21 would apply.

B. NONCONFORMANCES:

1. Contrary to Criterion V of Appendix B to 10 CFR Part 50 and Section 6.3 of the Quality Assurance Manual (QAM), it was noted that the Quality Control Procedure Book (S/N 0012) assigned to the Chief Inspector contained issue No. 1 dated July 31, 1979 of procedure QC 13-1 "Packaging Procedure for B Level Jobs" when the current revision was issued No. 2 dated June 1, 1983.
2. Contrary to Criterion V of Appendix B to 10 CFR Part 50 and Section 4.2 of the QAM, a review of POs to vendors of electrical components used on Unit 1A and Unit 1B 480V load centers (shop order No. 61650) for River Bend indicated an absence of Form RQAR-1 for PO 61650-29 to AMP Special Industries (AMR) for connectors.
3. Contrary to Criterion V of Appendix B to 10 CFR Part 50 and Section 7.1.2 of the QAM, a review of QA programs and manuals for 10 vendors who supplied components and 2 service vendors for the 480-V load centers for River Bend revealed the following:
 - a. QA programs and manuals for 6 vendors (Nunn Electric, Hisco, Timers & Controls, Industrial Equipment, Amerace, and AMP) were not on file.
 - b. There was no documented evidence that the QA Manager had reviewed the filed copies of programs and manuals for:

REPORT
NO.: 99900885/85-01

INSPECTION
RESULTS:

PAGE 3 of 9

Southern Transformer (May 1982), Westinghouse (August 1978), Brown Boveri (Revision 6 pages only dated October 1983), General Electric (3 department manuals dated July 1982, November 1983, and October 1984), Rheuble & Associates (August 1983), and Wyle Laboratories (February 1977).

4. Contrary to Criterion V of Appendix B to 10 CFR Part 50, Section 10.1 of the QAM, and Section III of Inspection Standard IS-00-2 a review of documentation package for shop order No. 61650 revealed that engineering related discrepancies were identified on Form 1D-1, but there was no indication that the discrepancies (15 for Unit 1A identified on June 22, 1983 and 19 for Unit 1B identified on June 27, 1983) were corrected and/or approved.
5. Contrary to Criteria V and VII of Appendix B to 10 CFR Part 50, Section 18.2 of the QAM, and Stone & Webster specification No. RBS-242.533, there was no documented evidence that Powell Electrical Manufacturing Company (PEMC) audited the following 9 vendors of electrical components and services supplied for the River Bend Load Centers: Westinghouse, Nunn Electric, Hisco, Timers & Controls, Industrial Equipment, Amerace, AMP Special Industries, Rheuble & Associated, and Wyle Laboratories.
6. Contrary to Criterion V of Appendix B to 10 CFR Part 50 and Section 7.1.2 of the QAM, a review of certificate of conformance (CC) from vendors supplying items used on shop order No. 61650 indicated that CCs were missing for the following POs:
 - * 61650-2-1 to General Electric (GE) for transformers
 - * L19747-1 to GE for breakers (S/Ns N89273A0012 and N89273B0010)
 - * 61650-9 to Timers & Controls for relays
 - * 61650-18-1 to Gould Brown Boveri for relays
 - * 61650-24 to Hisco for wire
 - * 61650-29 to AMP for connectors
7. Contrary to Criterion V of Appendix B to 10 CFR Part 50 and Section 10.2 of the QAM, there is no documented evidence that the Quality Control Supervisor or his representative inspected the welds on terminal cabinet 1 RPC TCA 11 that was part of the 40 cabinets shipped in 1983 to the River Bend nuclear facility.

REPORT
NO.: 99900885/85-01

INSPECTION
RESULTS:

PAGE 4 of 9

8. Contrary to Criterion V and XVII of Appendix B to 10 CFR Part 50, there is no documented evidence of QA inspection or test records for 10 bus bars shipped separately with 10 terminal cabinets to River Bend 1 on April 9, 1983.

C. UNRESOLVED ITEMS:

1. River Bend - Load Centers - The Documentation Data Package Book for the 4-480 V load centers ordered by Stone & Webster (S&W) on PO No. RBS-242.533-265 for River Bend was reviewed. It was noted that S&W's CC for each load center was signed and dated in June 1983 by both PEMC's QA Manager and S&W's representative as having met the requirements of the referenced specification. Although Wyle Laboratories qualified the load centers as Class 1E equipment, the Operational Life Durability Qualification Test Report was not approved by PEMC until September 28, 1984. As of January 18, 1985, S&W had not approved the seismic report. Until this is accomplished, there is no documentation showing the acceptance of the load centers to the specified requirements of IEEE Standards 323 and 344. The satisfactory completion of this activity will be evaluated during the next NRC inspection of PEMC, S&W, and/or the licensee - Gulf States Utilities Company.
2. 480 Volt Switchgear Units - A review of documentation pertaining to nuclear safety related equipment manufactured by PEMC revealed the following:
 - * Qualification Plan No. 543/3925/ES dated March 28, 1980, from Wyle Laboratories described the specific tasks that Wyle would perform to qualify to IEEE-323 the trip breaker equipment assembled and/or manufactured by PEMC. It was noted that the equipment was for Diamond Power Division of Babcock and Wilcox (B&W) in Lancaster, Ohio.
 - * A letter dated April 7, 1980 from Powell to Diamond Power transmitted quotation No. H80-0432-62 for 8-480V, 3-phase, 60 cyc switchgear units to be delivered to Richland, Washington and one prototype unit to be delivered to Lancaster, Ohio.
 - * Item No. 9 in an April 17, 1980 memo signed by PEMC's Nuclear Project Manager identified control rod drive system, reactor trip, low voltage switchgear for Diamond Power with a footnote that the equipment was being qualified to the requirements of IEEE-323.

REPORT
NO.: 99900885/85-01

INSPECTION
RESULTS:

PAGE 5 of 9

Pertaining to the above subject, PEMC was not able to furnish any other QA records. Subsequently, until it has been resolved that these units were or were not fabricated and delivered to Diamond Power, this item will remain open and will be evaluated during a future inspection of PEMC, the Diamond Power Division of B&W, and/or the licensee-Washington Public Power Supply System (WPPSS).

3. Salem - 480V Switchgear - PEMC built and shipped in 1979 a two-unit vital bus extension to Public Service Electric and Gas Company (PSE&G) for the Salem Nuclear Generating Station, Unit No. 1. This was built to PSE&G specifications 72-504 and 79-1300 which called for seismic qualification to IEEE Standard 344, but not to IEEE Standard 323.

Rheuble & Associates (R&A) the consultant who was engaged to conduct the seismic test and to write the report, stated in letters to PEMC dated October 12 and 15, 1979, that it would not be possible to qualify the subject switchgear by using the WPPSS prototype test data. However, the Seismic Vibration Durability Qualification Test Report prepared by R&A and dated December 15, 1979, states that "... seismic qualification of the subject equipment was attained and verified by ... using the representative prototype equipment only....," but there was no other documentation at PEMC to justify the change in acceptability.

In addition, curves on pages 20 and 21 of the seismic report compare PSE&G's required response spectrum (RSS) with zero percent damping to the prototype testing sample's test response spectrum (TRS) at two percent damping. This appears to be contrary to the normal accepted practice in comparing RSS with TRS. A telephone conversation on January 17, 1985, with a representative of R&A revealed some of the background for the report, but the specific concerns could not be answered. This item will remain open and will be evaluated during the next inspection of PEMC and/or PSE&G.

D. OTHER FINDINGS AND COMMENTS:

1. Procedures and Drawings - The QA Procedures Book was reviewed to assure that activities affecting quality are prescribed by and accomplished in accordance with documented procedures. The QC Procedures Book, which supplements the QA Manual is divided into 19 sections, 18 of which address the 18 sections of ANSI N45.2. Information in four of the sections (i.e., Design Control; Instruction, Procedures and Drawings; Identification and Control of Materials, Parts and Components; and Inspection, Test and

REPORT
NO.: 99900885/85-01

INSPECTION
RESULTS:

PAGE 6 of 9

Operating Status) was missing, and the QA Manager indicated that these sections were not addressed because PEMC felt that the applicable section in the QA manual contained adequate information/requirements. A review of the QC Procedure Book assigned to the Chief Inspector indicated that the procedure addressing Handling, Storage, and Shipping was out of date.

The NRC inspector reviewed 11 drawings pertaining to shop order (SO) No. 61650. One drawing addressed "Switchgear Specifications," 5 pertained to Bill of Materials, 4 were "Control Schedule for Breakers" and one was a "Three Line Diagram." All the drawings were signed and dated June 29, 1983, by a QA representative. The inspector was told that QA only reviews and approves revisions/changes and not the original issue of drawings released by Engineering. It was noted that all the drawings contained the following stamped information: "File as Built," "Nuclear Safety Related," and "Follow QA Procedure for B Level," but there was no evidence of documentation (e.g., instructions/procedures) which addressed the use of these stamps.

The Inspection Standards Book (ISB) was also reviewed. The ISB includes detailed procedures for the final inspection of all the equipment that is manufactured by PEMC. Each procedure outlines the minimum requirements for final inspection of the following: panelboards (250 & 600V) switchboards (680V), motor control centers (600V and 2.5 & 5KV), low voltage switchgear (600V), metal clad switchgear (5 & 15KV), interrupter switchgear (5 & 15KV), bus duct (600V and 5 & 15KV), and power control room building.

Nonconformance B.1 was identified in this area of the inspection.

2. Control of Purchased Material & Services - The inspector reviewed applicable sections of the QAM and 19 POs to suppliers of components used on SO 61650. All the POs contained "boiler plate" QA notes which, among other things, referenced: customer's specification, Class 1 material, nuclear safety related, 10 CFR Part 21, and Form RQAR-1. The required QA records including CCs to specific standards (e.g., ANSI, NEMA, IEEE) were identified on the RQAR-1. It was noted that the QA Manager failed to initial 7 of the 18 RQAR's reviewed. Applicable CCs from 14 suppliers were also reviewed. A CC was missing from 5 suppliers - GE (2 circuit breakers with S/N N89273A0012 and N89273B0010 and instrument transformers); Hisco (wire); Timers & Controls (relays); Gould Brown Boveri (relays); and AMP Special Industries (connectors). The review was undertaken to assure that applicable specification and QA program requirements were included

REPORT
NO.: 99900885/85-01

INSPECTION
RESULTS:

PAGE 7 of 9

or referenced in procurement documents, material and services were purchased from qualified vendors, and items met the technical and quality requirements identified in the POs.

Nonconformances B.2 and B.6 were identified in this area of the inspection.

3. Vendor Audits - External audit reports were evaluated to assure that the QA programs, procedures, and activities of suppliers were verified and evaluated by PEMC. For the 12 suppliers (10-components and 2-service) utilized on SO 61650 (Units 1A and 1B of the 480 V load centers for River Bend), it was noted that a pre-award evaluation or an audit was not conducted on 9 of the 12 vendors. Reports indicated the other three suppliers were last audited as follows: GE (Plainville in December 1978, Houston in January 1980, and Bloomington in November 1978); Southern Transformer in September 1982; and Gould-ITE (Bland, Virginia, in June 1978). QA records indicated that PEMC conducted a total of 13 external audits beginning in May 1978 with the final audit being conducted in September 1982. The only other supplier that PEMC audited was Meters and Instruments in January 1980.

PEMC had 9 QA manuals from suppliers of components and services on file. The latest manual was dated February 1976 (Southwest Research Institute), and the most recent was dated October 1984 (GE's Power System Management-Business Department). Manuals were missing for a number of vendors (e.g., Hisco, Amerace, Timers & Controls, AMP Special Industries, etc.) who supplied components for class 1E electrical equipment. In addition, there was no documented evidence that the QA department had reviewed and approved any of the manuals in their possession.

Nonconformances B.3 and B.5 were identified in this area of the inspection.

4. Compliance with 10 CFR Part 21 Requirements - The procedure for reporting defects was reviewed and the shop area was inspected to verify that PEMC had complied with the posting and procedural requirements of 10 CFR 21.

Violations A.1 and A.2 were identified in this area of the inspection.

REPORT
NO.: 99900885/85-01

INSPECTION
RESULTS:

PAGE 8 of 9

5. River Bend - Terminal Cabinets - QA records for 40 terminal cabinets manufactured and shipped to River Bend in 1983 were reviewed. S&W was the customer's representative for these cabinets and in many cases inspected them at various hold points. However, there is no evidence of S&W inspection on the welding report, at the various hold points of the inspection report, or on the customer inspection report for cabinet 1 RPC TCA 11.

S&W's CC accepted non-standard welds on several similar cabinets on Nonconformance and Deviation (ND) Report P031, but this ND report did not include cabinet 1 RPC TCA 11. Although the welds were made by welder No. 13 using MIG welder No. 5 and electrode lot number No. 20932, there is no documentation to establish the acceptability of the welds made in this Class 1E cabinet.

Forty Class 1E terminal cabinets were fabricated and shipped to River Bend per PEMC SO 62562. The first 10 were needed so urgently that they were shipped on April 9, 1983, unfinished (i.e., unpainted and the bus bars not installed). There were no inspection records for these first 10 bus bars, and they appeared to be older ones not made for this job. The other 30 cabinets had bus bars with acceptable inspection records. Ten additional bars made on SO A584 were shipped with acceptable records to River Bend 1. However, there were no records available to show whether or not these acceptable bus bars replaced the original bars in the first 10 terminal cabinets. This item will be evaluated during a future inspection of the licensee.

Nonconformances B.7 and B.8 were identified in this area of the inspection.

6. QA Records - In the last five years, PEMC has fabricated and shipped Class 1E equipment to eight nuclear power plants (WPPSS, River Bend, Seabrook, Perry, Palisades, Clinton, Salem, and Turkey Point). The equipment consisted of terminal cabinets, fuse cabinets, distribution panels (125 V DC and 120 V AC), and 480 V load centers, motor control centers, and switchgear. Since PEMC had no nuclear hardware being fabricated in the plant, the inspection consisted mainly of a review of QA records pertaining to three recent nuclear jobs, namely:

- * 480 V load centers and motor control centers for WPPSS - 1981 shipment
- * 480 V load centers and terminal cabinets for River Bend - 1983 shipment

ORGANIZATION: POWELL ELECTRICAL MANUFACTURING COMPANY
HOUSTON, TEXAS

REPORT
NO.: 99900885/85-01

INSPECTION
RESULTS:

PAGE 9 of 9

* fuse cabinets for Seabrook - 1984 shipment

A review of customer POs and specifications for the three jobs indicated that the equipment was to be qualified in accordance with IEEE Standards 323 and 344, QA requirements were to meet Appendix B to 10 CFR Part 50, and the requirements of 10 CFR Part 21 were applicable. Selected POs to suppliers and certifications from suppliers were reviewed to assure that individual components met the technical requirements of the specification.

Documentation packages consisting of: inspection reports; CCs; shipping data; and a quality checklist booklet (containing switch-gear checklist; assembly, bussing, and wiring quality checklist; production release to inspection; and inspection discrepancies) were reviewed. It was noted that the Inspection Discrepancies for Engineering report for S0 61650 listed 15 nonconforming items (Unit 1A) and 19 nonconforming items (Unit 1B), but there was no documented evidence that any of the nonconformances were corrected or properly dispositioned.

Nonconformance B.4 was identified in this area of the inspection.

Company POWELL ELECTRICAL INC.

Docket/Report No. 9990-885/85-01

Dates Jan. 14-17 1985

Inspector J. CONWAY / E. MacDougal

Page 1 of 1[illegible]

INSPECTOR ED MAC DOUGALLSCOPE PERIODIC INSPECTIONPOWELL ELEC. PRODUCTS CO. (PEPCO)DOCKET NO 3900-885REPORT NO. 85-01

DOCUMENTS EXAMINED

ITEM NO.	TYPE OF DOCUMENT	DOCUMENT NO.	REV.	DATE	TITLE/SUBJECT
1	QCD			2/16/81	AMCANCE RELAY CERTIFICATE OF CONFORMANCE (C.O.C.)
2	QCD			3/16/81	BROWN BOWARI " " "
3	Q.C.D			1/27/83	SOUTHERN TRANSFORMER CO C.O.F.C.
4	Q.C.D			6/20/83	" " "
5	Q.A.M		7	9/26/83	PEPCO Q.A. MANUAL
6	QCD			3/1/83	INSPECTION REPORT - WELDING - 1ST 10 CABINETS
7	QCD			4/9/83	CUSTOMER INSPECTION REPORT
8	QCD			4/9/83	FINAL INSPECTION REPORT
9	QCD			4/9/83	DOCUMENT DATA PACKAGE
10	QCD			'83	DOCUMENT PKG IACP TCA 12, 14, 16, 03 AND 04
11	QCD			'83	SHIPPING PACKAGE SAME AS ITEM 10 ABOVE
12	QCD			4-15-83	DOCUMENT PKG IACP TCA 02A, 10A, 15A, 14A, 15A 16A, 01F, 02F, 03F AND 04F
13	QCD			4-15-83	SHIPPING PKG SAME CABINETS AS SHOWN IN ITEM 12 ABOVE

TYPE OF DOCUMENT:

DWG - Drawing

SPEC - Specification

PRO - Procedure

QAM - QA Manual

QCD - QC Document

P.O. - Purchase Order

LTR - Letter

_____-

INSPECTOR ED MAC DOUGALL
 SCOPE VENDOM INSPECTION
PEPCC

DOCKET NO 3900-885REPORT NO. 85-01

DOCUMENTS EXAMINED

ITEM NO.	TYPE OF DOCUMENT	DOCUMENT NO.	REV.	DATE	TITLE/SUBJECT
14	QCD	P030	0	3-22-83	NON CONFORMANCE AND DISPOSITION (N AND D) SOW.
15	QCD	P26717	0	3-22-83	E AND D.C.A. BY STONE AND WESSER
16	QCD	9.2 ETC		6-9-82	PROCEDURES 9.2, 9.4, 9.5, 13.1 AND 13.2
17	QCD			11-30-83	I.S.B. SECTION VI INSPECTION STD. BOOK
18	SPEC	ABS 242.533		3-18-83	PURCHASE SPEC.
19	QCD	IS 20-1	3	11-30-83	INSTR. STD.
20	QCD			6-23-83	DOCUMENT DATA PACKAGE # ABS 242.533-265
21	QCD			6-24-83	SOW CERT. OF CONFORMANCE
22	QCD	→		VARIOUS	EB3CA'S 20916, 20918, 20920, 20776A, 20882A, 511A
23	SPEC	72-504		12/15/72	PSEBCC GENERAL SPEC
24	SPEC	79-1300		9/24/79	DETAILED SPEC PSEBCC POE-21157
25	LTA			10/12/79	AMENDABLE TO PEMCO
26	LTA			10/15/79	AMENDABLE TO PEMCO
27	REPORT			12/15/79	AMENDABLE TO PEMCO - SEISMIC REPORT - SALEM

TYPE OF DOCUMENT:

DWG - Drawing
 SPEC - Specification
 PRO - Procedure
 QAM - QA Manual
 QCD - QC Document
 P.O. - Purchase Order
 --- Internal Memo

LTR - Letter
 25 - 10/12/79
 26 - 10/15/79

INSPECTOR Jim Conway
SCOPE Y

DOCUMENTS EXAMINED

DOCKET NO. 99900885
REPORT NO. BS-01
PAGE 1 OF 2

ITEM NO.	TYPE OF DOCUMENT	DOCUMENT NO.	REV.	DATE	TITLE / SUBJECT
1	QAM		1	9-26-83	QUALITY ASSURANCE MANUAL
2	PO				2080 to vendors of electrical components for 50461650
3	OTH		4	11-30-83	INSPECTION STANDARDS BOOK
4	OTH				QUALITY CONTROL PROCEDURES BOOK
5	OTH				PRODUCTION STANDARDS BOOK
6	SPEC	RBS-242.533		9-22-79	S&W's spec "Standby 480-V Load Centers" for Rwei Bend
7	OTH			6-10-80	Appendix 1 to spec. no. RBS-242.533
8	OTH	RBS-242.533	1	3-12-83	See item #6:
9	OTH				19 RQAR Forms (Required QA Records)
10	QWG	61650-81	4	4-13-83	"Switchgear Specifications"
11	QWG	61650-03			"Three Line Diagram"
12	PPO	QC 13-1	2	6-1-83	"Handling, Storage & Shipping"
13	PPO	QC-Misc-2	4	3-6-82	"Regulations of 10 CFR-21"
14	OTH				Certificate of Compliance from 14 vendors
15	PO	RBS-242.533-265		10-8-80	S&W to Powell for 4 - Standby 480-V Load Centers

TYPE OF DOC.:

DWG - DRAWING
SPEC - SPECIFICATION
PRO - PROCEDURE
QAM - QA MANUAL
QCD - QC DOCUMENT
P.O. - PURCHASE ORDER

LTR - LETTER
OTH - OTHER

INSPECTOR Jim Conway
SCOPE _____

DOCUMENTS EXAMINED

DOCKET NO. 99900885
REPORT NO. 85 - 01
PAGE 2 OF 2

ITEM NO.	TYPE OF DOCUMENT	DOCUMENT NO.	REV.	DATE	TITLE / SUBJECT
16	OTH				SHIPPING DOCUMENTATION DATA PACKAGES FOR LOAD CENTERS NO LOCATIONS
17	OTH				EQCR DOCUMENTATION PACKAGES FOR UNITS LOCATED LOCIB
18	PRO	QC-Q-5	1	12-14-82	"POWELL STANDARD WELDING PROCEDURE SPECIFICATION"
19	PRO	QC-Q-2	6	6-9-82	"WELDING PROCEDURE SPECIFICATION 6MAW GRP 1-B2"
20	OTH				QUALITY CHECKLIST BOOKLET FOR UNITS LOCATED LOCIB
21	OTH	0484-12210-SEIS		8-8-84	TEST PROCEDURE - CATEGORY 1E SEISMIC QUALIFICATION OF 4 STANDBY
22	OTH	0483-JO. 12210		8-8-84	480-V LOAD CENTERS F.R. RIVER BEND STATION
23	OTH	0484-JO. 12210-QR		4-28-84	OPERATIONAL LIFE QUALIFICATION TEST PLAN - 4 LOAD CENTERS - RIVER BEND
24	OTH	100183	1	5-24-84	OPERATIONAL LIFE DURABILITY QUAL. TEST REPORT -
25	OTH				IEEE QUALIFICATION REPORT - TRANSFORMERS FOR RIVER BEND LOAD CENTERS
26	OTH				13 - EXTERNAL AUDIT REPORTS OF 6 VENDORS
27	OTH				QA MANUALS FROM 9 VENDORS
28	OTH	543/3425 ES		4-7-80	LETTER POWELL TO DIAMOND POINT - TRANSMITTED QUOTE NO. H80-0432-62
	OTH			3-20-80	WYLC LABS - QUALIFICATION PLAN

TYPE OF DOC.:

DWG - DRAWING
SPEC - SPECIFICATION
PRO - PROCEDURE
QA - QA MANUAL
QC - QC DOCUMENT
PO - PURCHASE ORDER

LTR - LETTER
OTH - OTHER