MEMORANDUM FOR:	Vincent S. Noonan, Director
	for the Comanche Peak Task Force
	Division of Licensing
	Office of Nuclear Reactor Regulation

FROM: Gary G. Zech, Chief Vendor Program Branch Division of Quality Assurance, Vendor and Technical Training Center Programs Office of Inspection and Enforcement

SUBJECT: ALLEGATION CONCERNING VENDORS USED AT COMANCHE PEAK

In January 1985, the VPB performed inspections of Litton-Veam and Weidmuller Terminations in response to your memorandum dated December 7, 1984. The Inspection Report Nos. 99900896/85-01 and 99900897/85-01 for the above organizations have been issued and we are sending you copies for transmittal to the alleger. This action is taken in accordance with the policy outlined in proposed NRC manual chapter 517, "Management of Allegations."

Should you have any questions with regard to this matter please contact Messrs. E. W. Merschoff (492-9045) or R. E. Oller (492-4638).

> ORIGINAL SIGNED BY: GARY G. ZECH

Gary G. Zech, Chief Vendor Program Branch Division of Quality Assurance, Vendor and Technical Training Center Programs Office of Inspection and Enforcement

cc: E. Fox, IE

Distribution ROller,IE EMerschoff, IE GZech, IE VPB Reading DMB-IE:09

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UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

FEB 2 2 1985

Docket No. 99900896/85-01

Veam, Division of Litton Systems Inc. ATTN: Dorine K. Sweet Quality Control Manager 100 New Wood Road Watertown, Ct. 06795

Gentlemen:

This refers to the inspection conducted by Mr. R. E. Oller of this office on January 7-8, 1985, of your facility at Watertown, Connecticut, and to the discussions of our findings with Mr. A. J. Bernardini and members of the plant staff at the conclusion of the inspection.

This inspection was made as a result of an allegation concerning inadequacies in your QA program as it might affect the quality of electrical equipment furnished to Comanche Peak Station. Areas examined during the inspection and our findings are discussed in the enclosed report. Within these areas, the inspection consisted of an examination of procedures and representative records, interviews with personnel, and observations by the inspector.

During the inspection it was found that the implementation of your QA program failed to meet certain NRC requirements. The specific findings and references to the pertinent requirements are identified in the enclosures to this letter.

Please provide us within 30 days from the date of this letter a written statement containing: (1) a description of steps that have been or will be taken to correct these items; (2) a description of steps that have been or will be taken to prevent recurrence; and (3) the dates your corrective actions and preventive measures were or will be completed. Consideration may be given to extending your response time for good cause shown.

The responses requested by this letter are not subject to the clearance procedures of the Office of Management and Budget as required by the Paper-work Reduction Act of 1980, PL 96-511.

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Veam, Division of Litton Systems, Inc.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter and the enclosed inspection report will be placed in the NRC's Public Document Room. If this report contains any information that you believe to be exempt from disclosure under 10 CFR 9.5(a)(4), it is necessary that you (a) notify this office by telephone within 10 days from the date of this letter of your intention to file a request for withholding; and (b) submit within 25 days from the date of this letter a written application to this office to withhold such information. If your receipt of this letter has been delayed such that less than 7 days are available for your review, please notify this office promptly so that a new due date may be established. Consistent with Section 2.790(b)(1), any such application must be accompanied by an affidavit executed by the owner of the information which contains a full statement of the reasons on the basis which it is claimed that the information should be withheld from public disclosure. This section further requires the statement to address with specificity the considerations listed in 10 CFR 2.790(b)(4). The information sought to be withheld shall be incorporated as far as possible into a separate part of the affidavit. If we do not hear from you in this regard within the specified periods noted above, the report will be placed in the Public Document Room.

- 2 -

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely. Kary X

Gary G. Zech, Chief Vendor Program Branch Division of Quality Assurance, Vendor and Technical Training Center Programs Office of Inspection and Enforcement

Enclosures:

- 1. Appendix A Notice of Nonconformance
- 2. Appendix B Inspection Report No. 99900896/85-01
- 3. Appendix C Inspection Data Sheets (4 Pages)

VEAM, DIVISION OF LITTON SYSTEMS INC. 99900896/85-01

APPENDIX A

NOTICE OF NONCONFORMANCE

Based on the results of an NRC inspection conducted on January 7-8, 1985 it appears that certain of your activities were not conducted in accordance with NRC requirements.

Criterion V of Appendix B to 10 CFR Part 50 states: "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

Nonconformances with these requirements are as follows:

A. Paragraph 2.3.1 of Part 2 of the Veam QA manual, Revision A, dated July 1981, with regard to internal audits, states in part, "... The audit is performed by an impartial person.... The auditors have no line responsibilities in the area involved...."

Contrary to the above, the lead auditor who performed the annual QA program audit in April 1983 held the official position of QA Manager. The lead auditor who performed the February 1984 annual QA program audit held the official position of QC Manager.

B. Paragraph 3.1.4 of Section 13 of the Veam QA manual, Revision A, dated July 1981, with regard to the responsibilities of the Quality Control Department, states, "... assure that outside laboratories used for calibration services are on the Approved Vendors List."

Contrary to the above, Gage Lab Company calibration service was not on the Approved Vendor List.

C. Paragraph 2.1 of Section 13 of the Veam QA manual, Revision A, dated July 1981, states, "Measuring and testing equipment will be calibrated against certified equipment having known valid relationship to nationally recognized standards."

Contrary to the above, no evidence was available to verify that the temperature controls on the two ovens used to cure connector insert adhesives had ever been calibrated.

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ORGANIZATION: VEAM, DIVISION OF LITTON SYSTEMS INC. WATERTOWN, CONNECTICUT

REPORT NO.: 99900896/85-01	INSPECTION DATE(S): 1/7-8/85	INSPECTION ON-SITE HOURS: 35
CORRESPONDENCE ADDRESS:	Veam, Division of Litton Sys ATTN: Dorine K. Sweet Quality Control Manag 100 New Wood Road Watertown, Ct 06795	
ORGANIZATIONAL CONTACT: TELEPHONE NUMBER:	Dorine K. Sweet, QC Manager (203) 274-9681	
PRINCIPAL PRODUCT: Elec NUCLEAR INDUSTRY ACTIVIT	trical Multipin Cylindrical M Y: Approximately 10%	letal Shell Connectors
ASSIGNED INSPECTOR: R. OTHER INSPECTOR(S): J.	E. Oller, Reactive Inspection	Section (RIS) Z/13/85 Date
E.	H. Trottier, RIS Choff, Chief, RIS, Vendor Pro	gram Branch Zlistes Date
NSPECTION BASES AND SCO	PE:	
. BASES: 10 CFR Part	21 and Appendix B to 10 CFR I	Part 50.
as it applies to fu Comanche Peak Stati	tion was made as a result of a cies in the contents of the ve rnishing of electrical equipme on. Concurrently, selected an dor's compliance with 10 CFR F d.	endor's QA program ent for use in reas of the OA
LANT SITE APPLICABILITY	: QA program deficiencies 50-	-445.

ORGANIZATION: VEAM, DIVISION OF LITTON SYSTEMS INC. WATERTOWN, CONNECTICUT

	ORT : 99	900896/85-01	INSPECTION RESULTS:	PAGE 2 of 4
Α.	<u>Vio</u> Non	<u>lations</u> : e		
в.	Non	conformances:		
	1.	2.3.1 of Part 2 of performed the ann position of QA Ma	erion V of Appendix B to 10 CFR P of the Veam QA manual Revision A, nual QA program audit in April 19 anager, and the lead auditor who al QA program audit held the offi	the lead auditor who 83, held the official performed the Feb-
	2.	3.1.4 of Section	erion V of Appendix B to 10 CFR P 13 of the Veam QA manual Revisio ion service was not on the Approv	in A, the Gage Lab
	3.	2.1. of Section 1 available to veri	erion V of Appendix B to 10 CFR P 13 of the Veam QA manual, Revisio ify that the temperature controls nector insert adhesives had ever	n A, no evidence was on the two ovens
с.	Unre	esolved Items:		
	None	e		
D.	Othe	er Findings or Comm	ments:	
	1.	Initial Managemen	t Meeting and Exit Interview:	
		information on th They were also gi and responsibility responsibility as tion Act of 1974 scope of the insp During the exit m	nanagement representatives were p be allegation which was the reaso ven an overview of the NRC organ ties. They were informed of the described in Section 206 of the and its implementing regulation bection and its required document meeting, the written responses rea Nonconformance were explained, as	n for the inspection. ization activities NRC's authority and Energy Reorganiza- 10 CFR Part 21. The ation were explained. guired of the vendor

ORGANIZATION: VEAM, DIVISION OF LITTON SYSTEMS INC WATERTOWN, CONNECTICUT

REPORT NO.: 9990089	96/85-01	INSPECTION RESULTS:	PAGE 3 of 4		
2. <u>A1</u>	legation:				
a.	Introduction:				
	On November 28, 1984, the NRC received information with regar to potential deficiencies in the quality assurance program of Litton Veam plant located in Watertown, Connecticut, as it ap to the manufacture and furnishing of terminations for electri cable for possible use in safety-related systems at Comanche Station. As a result of this allegation, an NRC inspection w performed at the Litton Veam plant on January 7-8, 1985.				
b.	Findings:				
	cylindrical meta 1977 through Jur manual called "L Procedure", date ments of: (a) qu a quality assura reporting, and t statement addres I-45208 (for ins No. Mil-Q-9858 (the plan met Qua However, the QA the 18 criteria them. In July 1 "Veam Quality As addresses all of and the requirem	plant is a manufacturer of electrical al shell connectors for cables. From the 1981, their QA program was document itton Precision Products International ad December 1977. This manual contain ality and reliability assurance polic ence plan, and (c) quality assurance set (10) quality control procedures. sed the requirements of Mil-Standards opection), No. Mil-C-45662 (for calibu- for the quality program) and a stater lity and Reliability Standards of 10 manual did not meet all of the require of Appendix B to 10 CFR 50, nor did 981, the manual was revised and issue surance Manual", Revision A. This QA the 18 criteria of Appendix B to 10 the shop procedure manual.	December ted in a al Quality ned stat- cy, (b) status The QA s No. Mil- ration) and ment that CFR 50. rements of it address ed as the A manual CFR 50,		
c.	Conclusion:				
	of deficiencies to 10 CFR 50 was July 1981. Howe	eve review, it was determined that the in the Veam QA program with regard to valid as it applied to the QA progra ever, the quality program in effect pr ide an adequate process quality contr	Appendix B am prior to for to 1981		

ORGANIZATION: VEAM, DIVISION OF LITTON SYSTEMS INC. WATERTOWN, CONNECTICUT

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ORT : 99	900896/85-01	INSPECTION RESULTS:	PAGE 4 of 4
3.	Other QA Program	Areas Inspected	
	the following are ment control; (b) (d) measuring and with 10 CFR Part procedures and re for Comanche Peak	the allegation followup, an as of the current QA program quality assurance records; testing equipment calibratio 21. This inspection was accords cords related to electrical of Station; programmatic record ions with cognizant management	: (a) procurement docu- (c) internal audits; on, and (e) compliance omplished by review of connectors furnished ds; observations in the
	These items inclu who were free of use of a calibrat	is inspection, three nonconfo ded: (a) failure to use inter line responsibility for the a ion contractor who was not or lure to calibrate the contro sert adhesives.	rnal audit personnel areas audited; (b) the n the Approved Vendor

"witten Precision Products International quality Variagement Policy For The quality Program Velan Shup GC procedures, Nassis 181, 182, 183, Memo concorning status of 9A Manaper who performed as official auditor for 1982-83 36800866 Recards of Internal Audil of 9A Program Records of Internal Audit of \$A Orogram 0 -184, 186, 190, 191, 192, 193 And 196 10 REPORT NO. 85 DOCKET NO. Veam guality Assurance Manual Lead auditor training rocords PAGE Approved Vendor LIST manual TINE / SUBJACT 9 A pregram audit. DOCUMENTS EXAMINED Brocedure LTR - LETTER Ap/ 1983 4-26-83 Doc 1977 686 2-13 84 VANOUS KATIOUS DATE 18/ 1 1 1 REV. A i ł ١ 1 Documents Veam Various DOCUMENT NO. P.O. - PURCHASE ORDER PROCEDURE 1 Ollor l 1 itton DWG - DRANING 0F DOC : TYR OF DOCUMENT UND 1VYO 900 INSPECTOR (000 LANT 000 900 000 PRO SCOPE_ SPEC -PR0-TYPE TTEM 1 m S 6 1 0 7 5 2

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Docket/Report No. 99900	896/85-01	Inspector Oller Trottier Petro
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NAME(Please Print)	TITLE(Please Print)	ORGANIZATION(Please Print)
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UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20655

FEB 2 6 1985

Docket 99900897/85-01

Weidmuller Termination Inc. ATTN: Mr. John Tyler Vice President and QA Manager 821 Southlake Blvd. Richmond, Virginia 23236

Gentlemen:

This refers to the inspection conducted by Mr. R. E. Oller of this office on January 9-11, 1985, of your facility at Richmond, Virginia, and to the discussions of our findings with Mr. H. H. Renner and other members of the plant staff at the conclusion of the inspection.

This inspection was made as a result of an allegation concerning possible deficiencies in the contents of your QA program as it applies to the furnishing of Class 1E terminal blocks to Comanche Peak station.

Areas examined during the inspection and our findings are discussed in the enclosed report. Within these areas, the inspection consisted of an examination of procedures and representative records, interviews with personnel, and observations by the inspector.

During the inspection it was found that the implementation of your QA program failed to meet certain NRC requirements. The specific findings and references to the pertinent requirements are identified in the enclosures to this letter.

Please provide us within 30 days from the date of this letter a written statement containing: (1) a description of steps that have been or will be taken to correct these items; (2) a description of steps that have been or will be taken to prevent recurrence; and (3) the dates your corrective actions and preventive measures were or will be completed. Consideration may be given to extending your response time for good cause shown.

The response requested by this letter is not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

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Weidmuller Terminations Inc.

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In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter and the enclosed inspection report will be placed in the NRC's Public Document Rcom.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

- 2 -

Sincerely.

Gary G. Zech, Chief Vendor Program Branch Division of Quality Assurance, Vendor and Technical Training Center Programs Office of Inspection and Enforcement

Enclosures: 1 Appendix A - Notice of Nonconformance 2 Appendix B - Inspection Report No. 99900897/85-01 3 Appendix C - Inspection Data Sheets (7 pages)

Distribution R. Oller, IE E. Merschoff, IE G. Zech, IE R. Vollmer J. Stone, IE VPB Reading DMB-IE:09 RMartin, RIV RStark, NRR SRI, Comanche Peak MSpence, TUGCO E. Fox IE

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*See previous pages for concurrences

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APPENDIX A

Weidmuller Terminations Inc. 99900897/85-01

NOTICE OF NONCONFORMANCE

Based on the results of an NRC inspection conducted on January 9-11, 1985, it appears that certain of your activities were not conducted in accordance with NRC requirements.

Criterion V of Appendix B to 10 CFR Part 50 states: "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

The nonconformance with these requirements is as follows: Section 9, Appendix H, "Final Inspection," of the Weidmuller Terminations Inc. Quality Assurance Manual, Revision dated November 21, 1983, states in part, "....When specified in the customer's purchase order or specification, terminal block assemblies shall be subjected to a dielectric withstand test. This dielectric test, unless otherwise specified, shall be in accordance with Underwriters (UL) Standard 1059 Terminal Blocks. Results of the test shall be recorded on MUS-1...."

Contrary to the above, the UL Standard 1059 dielectric withstand test results were not entered on seven MUS-1 records as required by Brown & Root Procurement Specification CPSES, Revision 0 & 1, for Class 1E terminal blocks furnished for Comanche Peak Station.

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ORGANIZATION: WEIDMULLER TERMINATIONS INCORPORATED RICHMOND, VIRGINIA REPORT INSPECTION INSPECTION NO.: 99900897/85-01 DATE(S): 1/9-11/85 ON-SITE HOURS: 39 CORRESPONDENCE ADDRESS: Weidmuller Terminations Inc. ATTN: Mr. John Tyler Vice President-Technical & Quality Assurance Manager 821 Southlake Boulevard Richmond, Virginia 23236 ORGANIZATIONAL CONTACT: Mr. John Tyler, V.P. & QA Manager TELEPHONE NUMBER: (804) 794-2877 PRINCIPAL PRODUCT: Electrical Railmounted Terminal Blocks NUCLEAR INDUSTRY ACTIVITY: Approximately 1/2% ASSIGNED INSPECTOR: FR. E. Oller, Regetive Inspection Section (RIS) Date OTHER INSPECTOR(S): J. J. Petrosino, RIS-E. H. Trottier, RIS APPROVED BY: E. W. Merschoff, Chip, RIS, VPB INSPECTION BASES AND SCOPE: BASES: 10 CFR Part 21 and Appendix B to 10 CFR Part 50. Α. SCOPE: This inspection was made as a re-ult of an allegation concerning Β. possible deficiencies in the contents of the vendor's QA program as it applies to furnishing of electrical equipment for use in Comanche Peak station. Concurrently, selected areas of the program and the vendor's compliance with 10 CFR Part 21 requirements were inspected. PLANT SITE APPLICABILITY: QA program deficiencies 50-445 85\$228\$383- 10gp.

CRGANIZATION: WEIDMULLER TERMINATIONS INCORPORATED RICHMOND, VIRGINIA

REPOND.		900897/85-01	INSPECTION RESULTS:	PAGE 2 of 3
Α.	VIO	LATIONS:		
	Non	e		
в.	NON	CONFORMANCES:		
	App Nov wer	endix H, "Final Ir ember 21, 1983, th e not entered on s	V of Appendix B to 10 CFR Par spection" of the vendor's QA M e UL Standard 1059 dielectric even MUS-1 records, as require n CPSES, Revision 0 & 1, for C e Peak station.	anual Revision dated withstand test results d by Brown & Root pro-
с.	UNR	ESOLVED ITEMS:		
	None	e		
D.	OTH	ER FINDINGS OR COM	MENTS:	
	1.	minations Inc. (authority and re Reorganization A Part 21. The sc were explained.	nt Meeting and Exit Interview: WTI) management representative sponsibility contained in Sect ct of 1974 and its implementin ope of the inspection and its During the exit meeting, the onses required of the vendor t plained.	s were informed of the ion 206 of the Energy g regulation 10 CFR required documentation inspection findings and
	2.	Allegation:		
		with regard lity Assura plant locat facture and possible us Electric St	n: On November 28, 1984, the to potential deficiencies in nce Program of the Weidmuller ed in Richmond, Virginia, as i furnishing of terminations fo e in safety-related systems at ation. As a result of this al rformed at the WTI plant on Ja	the content of the Qua- Terminations Inc. (WTI) t applies to the manu- r electrical cable for Comanche Peak Steam legation, an NRC inspec-

b. <u>Findings</u>: Weidmuller Terminations Inc. (WTI) is a manufacturer of electrical railmounted terminal blocks of which certain models have been qualified for 1E service in accordance with IEEE Standard 323-1974, for both in-containment and outside-containment

ORGANIZATION: WEIDMULLER TERMINATIONS INCORPORATED RICHMOND, VIRGINIA

REPORT NO.: 99500897/85-01	INSPECTION RESULTS:	PAGE 3 of 3
service. Termin Peak station sin	nal blocks have been furnished by WTI nce 1979.	to Comanche
It was relocated were first furn sent their QA ma the earliest ed revision reviewe This issue was f identification of procedures, reco can be categoriz In February 1981 ments of Appendi dures in the mar	as been located in Richmond, Virginia d to the present address in 1980. Ten ished for Comanche Peak in 1979, at we anual to Brown & Root. During this NF ition of the QA Manual was not available d by the NRC inspectors was dated Man found to include a quality assurance so of foreign suppliers of component part ord forms and an organization chart. ted as meeting 11 of the 18 criteria of 1, the manual was revised to satisfy to ix B. In November 1983, certain criter nual were revised. This revision cont requirements of Appendix B and the re	rminal blocks hich time WTI C inspection, ble. The rch 18, 1980. statement ts, and The contents of Appendix B. the require- eria and proce- tinues to
tially substanti program did not 10 CFR 50. Howe appeared to prov The current QA p	ased on the above review the allegatic iated in that prior to February 1981, fully address the requirements of App ever, the quality program in effect pr vide an adequate process quality contro- brogram addresses and/or meets all of ix B to 10 CFR 50 and ANSI N45.2.	the QA pendix B to rior to 1981 rol program.
3. OTHER QUALITY ASSURAN	ICE PROGRAM AREAS INSPECTED	
the following areas o control; (c) QA recor conforming items; (g) control, and (i) comp accomplished by revie electrical terminal b	e allegation followup, an inspection w of the current QA program: (a) inspect ds; (d) QA program; (e) organization; corrective action; (h) procurement of liance with 10 CFR Part 21. The insp w of procedures and records related to locks furnished for Comanche Peak sta servations in the shop, and discussion and.	tion; (b) test (f) non- document pection was to the ation; pro-
This item concerned W electric withstand te QA manual, and Brown	nspection, one nonconformance was ide TI's failure to include UL-1059 stand st results on MUS-1 records as requir & Root Procurement Specification, Rev al blocks furnished for Comanche Peak	lard di- ed by the ision 0 &

PERSONS CONTACTED

Company Weidmuller Terminations Inc. Dates 1/10-11/85 Docket/Report No. 99900897/85-01 Inspector Ollar Patrosino/ Trathe

Page of /

* Attended the Exit meeting.

NAME(Please Print) TITLE(Please Print) ORGANIZATION(Please Print) H.H. Renner * President Weidmuller Terminations In J.H. Tyler * VPTechnical J.G. Dunn * VP Sales & Marketing " J.L. Fisher Internal Sales Mar " 11 11 11 11 R. H. Preschea QC Inspector 11 1.

8.2279 Browny Root Procurement Specification For Class LE Termina/ Blocks for CPSES (comanche Peat Steam Elec. Sta.) - Various 84 R and TUGECO on NUA | blanket P.asstor T.B.s for 1982 1983484 WIT hetter to Brown + Root, alen Ros, Texas concern-1550 6/80 A manual of a major supplier of terminal block parts, WTI letter to ay molding, subsugation covering receipt. of manual of a major supplier of forminal block parts, and approval of the suppliers of program manual With Assurance DOCKET NO. 99900897 - 12-11-8 Brown + Roat Request to WIL for a guatation 0-M REPORT NO. 85 40 ine transmitted of the WTI QA manual. PAGE 349-80 WTI QUALITY ASSURANCE MANUAL Weidmuller Terminations Inc. located in Nest Commany TIME / SUBJACT to cated in England. DOCUMENTS EXAMINED BD - PLOCUTEMONT DOCUMENT Manual 11-21-83 - 5-19-80 6-17-8 277 Scope All Documents Weidmuller Forminations Inc. DATE REV. Ø ·P 1 1 ~ 35-199 POCUHENT NO. 1 1 6 SPEC- SPECIFICATION 1 1 1 1 1 THISPECTOR OV/PT DRANING TYPE OF DOC POCUMENT PAMO NAQ CAND GAM P.D. 478 LTR P.D. 0à - ONO Ti * 6 1 m M 5

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