



# THE ROCKBESTOS COMPANY

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April 30, 1985

U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Mr. G. G. Zech  
Chief Vendor Program Branch  
Mailstop BAW 359

Subject: The Rockbestos Company  
Docket No. 99900277/85-01

Dear Mr. Zech:

Following are our responses to the report of inspection 85-01, dated April 19, 1985.

## Nonconformances

- A. 1. Prior to further LOCA testing a procedure for use of an alternate batch sampling method of monitoring spray pH will be generated. This procedure will be consistent with the method used during testing under TP 4804 (chemically cross-linked Firewall III).  
Completion date: May 15, 1985
2. Prior to further LOCA testing the instructions for preparing chemical spray solutions will be revised to require checking the pH prior to use to assure correct pH as prescribed by the applicable test plan. The unplanned high spray pH will be addressed as an anomaly in supporting data for testing under TP 4804.  
Completion date: May 15, 1985

The above procedure and instruction will be utilized to prevent recurrence of the nonconformance

- B. The late closure of the LOCA autoclave chamber vent valve will be addressed in TP 4804 supporting data as a test anomaly.

For future tests, a copy of autoclave operating procedure No. 6 (or a checklist generated from this procedure) will be in the autoclave area during active portions of the LOCA test, and will be utilized by the technician operating the autoclave.  
Completion date: May 15, 1985

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April 30, 1985

C. The following deviations from calibration procedure No. 48 will be addressed in supporting data for TP 4804 and their effect analyzed:

1. Chemical spray sample solutions were not stirred with a magnetic stirrer during pH measurement.
2. The combination probe of the pH meter used to monitor chemical spray pH was not rinsed following removal from each immersion in sample or buffer solution.

For future LOCA tests, the applicable procedure for pH checking will be in the working area and will be utilized by the technician performing pH measurement.

Completion date: May 15, 1985

D. It has been verified, with the following exception, that all Rockbestos requirements for purchase orders for outside calibration of equipment had been met for calibrations performed under P.O. 13944 dated 11/12/84, to ECL.

ECL weight set A was last calibrated on 9/12/73. Rockbestos however, requires primary standards to have been calibrated within the previous three years. This deviation has been approved, based on the type of standard involved.

E. A corrected calibration data sheet has been prepared and annotated as a corrected copy of the original data sheet. The correct entry was established by arithmetic comparison with associated data.

The technician has signed off on his understanding of paragraph 7.3.2 of the technical manual, regarding changes in document entries.

The technical manual has been revised to clarify the method for making corrections to data entries.

#### Status of Previous Inspection Findings

(Comments where response not previously provided)

##### Item D.7.a

The effect of chamber pressures less than 20 psig, and therefore, beyond the range of calibration of the LOCA chamber pressure transducer, will be documented in supporting data for TP 4804. The same analysis will be applied to future tests as applicable.

Status of Previous Inspection Findings - Continued

Item D.7.b

A calibration certificate will be obtained from the manufacturer of the LOCA chemical spray flowmeter. The effect on accuracy of stainless steel piping compared with carbon steel piping will be addressed. If the carbon steel (CS) designation on the present flowmeter calibration sticker proves to be incorrect, a corrected label will be obtained.

Completion date: June 1, 1985

Item D.7.c(1)

The effect of omission of buffer solution pH temperature correction will be addressed in supporting data for TP 4804.

Appropriate temperature corrections will be applied during future tests.

Item D.7.c(2)

Calibration procedure No. 50 for the spray flowmeter has been revised to specify accuracy limits of  $\pm 20\%$ .

The technical manual has been revised to include this exception when invoking Quality Manual Section 13 for equipment calibration.

A statement addressing exceptions to stated accuracy tolerances for qualification test equipment will be included in the next series of revisions to Quality Manual Section 13.

Other Findings and Comments

(includes only those items where a response seems appropriate)

Item 3.

Test Plan 4805, revised to March, 1985 includes correct product codes for the test samples, and reflects experience gained to date during testing under TP 4804.

Item 5.

Procedures will be revised to provide for auditability of data logger and strip chart recorder outputs by requiring as applicable, the following annotations currently being made in practice:

April 30, 1985

Other Findings & Comments - Continued

## Item 5. - Continued

1. dates
2. times
3. charts
4. speeds
5. channel identifications
6. scales
7. sensitivities
8. input identifications
9. descriptions

## Item 6.

Future revisions of test plans for current and future tests will delete reference to ASTM D-2865 as a calibration program standard reference.

MIL-C-45662A or its successor MIL-STD-45662 will be referenced on future purchase orders for calibration of qualification test equipment, in addition to the standard Rockbestos requirements for these purchase orders. We are in the process of obtaining a copy of MIL-STD-45662.

For TP-4804, a previous Rockbestos survey has determined that the outside calibration service utilized has a calibration system in accordance with MIL-C-45662A.

## Item 11.

Training outline procedure Q-25B, revision 1 was issued 1/21/85 to clarify acceptable methods of indicating applicability of signatures or initials on training sheets.

## Item 12.

The ECL calibration service survey report was located and shown to the NRC inspector during an inspection conducted April 22-24, 1985.

Very truly yours,

*G. G. Littlehales/lm*  
G. G. Littlehales  
Manager, Quality Assurance

GGL/lam

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