50-482

WOLF CREEK
NUCLEAR OPERATING CORPORATION

March 28, 1997
QS 97-0016

Ameron Protective Coating Group
11605 Vimy Ridge Road
P.O. Box 192610
Little Rock, AR 72219-2610

Attention: Mr. Michael Lamb, Quality Assurance Manager

Subject: Evaluation of Ameron Response to WCNOC/Supplier Quality Audit Findings

Reference: WCNOC Audit Report – A350-K002
Ameron Response -- letter dated 2/27/97

Dear Mr. Lamb:

Wolf Creek Nuclear Operating Corporation/Supplier Quality has evaluated the Ameron response to the findings identified during the audit conducted 1/22-23/97 and 1/28-31/97.

The evaluation found that responses to findings RON 01/97-001 through 01/97-011 are conditionally accepted, with additional responses required for RON's 01/97-009 and 010 by 5/1/97. Below is a status of the findings and the required action to be taken by Ameron.

RON NUMBER	FINDING STATUS	ACTION REQUIRED
01/97-001	Open	Corrective action status update due 5/1/97
01/97-002	Open	Corrective action status update due 5/1/97
01/97-003	Open	Corrective action status update due 5/1/97
01/97-004	Open	Corrective action status update due 5/1/97
01/97-005	Open	Corrective action status update due 5/1/97
01/97-006	Open	Corrective action status update due 5/1/97
01/97-007	Open	Corrective action status update due 5/1/97
01/97-008	Open	**Additional response required by 5/1/97** to address whether WI-041 "Purchase Orders" will include the requirement to impose the calibration suppliers quality program and MIL STD 45662A or ANSI Z5 10 in Ameron purchase orders to calibration suppliers.
01/97-009	Open	**Additional response required by 5/1/97** to address the frequency of audits. Also as stated in the original audit report, audits of Brookfield and Fluid Power must be conducted within six months our audit exit meeting.
01/97-010	Open	Corrective action status update due 5/1/97
01/97-011	Open	Corrective action status update due 5/1/97

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DFO1
per: Jim Stone

As noted in the above table, a corrective action status update for all findings is due on 5/1/97. The updates are important to ensure that corrective action due dates are being met and implemented as required.

Should you have any questions about the evaluation, please contact me at (316)364-4156 or Mr. Vic Canales, Supervisor Supplier/Materials Quality at (316) 364-4214.

Sincerely,

Terry L. Krause
Supplier Quality Specialist III

Attachment: Ameron Response

cc: V. J. Canales (AE-SQ), w/o
J. D. Kitchens (AE-PUR), w/o
W. B. Norton (CC-PIA), w/o
D. G. Long (AE-ME), w/o
R. L. Traudt (CC-DES), w/a
NPRDS A350 File
NUPIC Membership, w/a
N. S. Hawkins - NSRC (CC-PIA), w/o
Vault (CC-DS), w/a
Document Services (CC-DS), w/o

February 27, 1997

AMERON
INTERNATIONAL

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Terry Krause
Wolf Creek Nuclear Operating Corp
PO Box 411
Burlington, Kansas 66839

Terry:

Please find attached the Ameron International Protective Coatings Group response to the Noncompliance Reports initiated during your recent NUPIC audit of our facilities. Please note that each Corrective Action has been assigned to a responsible manager and that each action has also been assigned a Target Completion date. A few of the Corrective Actions have already been implemented. However, several of the Corrective Actions will require some changes to the computer system and will not be implemented until the new, S2K computer system is up and running. This explains the lengthy time lines that have been defined for some of the Corrective Actions.

If you have any questions or comments regarding the proposed Corrective Actions, please contact me immediately. Otherwise I will get in touch with you over the next couple of weeks.

Sincerely,

Micheal Lamb

Quality Manager

cc. K. Kolinek, J. Garnett, G. Smith, S. McKown, R. Gasmena, C. Stanley, H. Kline, S. Bosan, A. Warren, M. Jones

doc. [illegible] wpd, M. Lamb, 2/27/97, version 1

RON NO: N/A RESPONSIBLE MANAGER: J. Garnett

AUDITOR RECOMMENDATIONS AND CONCERNS

1) When raw materials are transferred from the original vendor bag into paper bags during the weigh out process, the auditors observed that several raw materials were transferred to unmarked bags and then the multiple unmarked bags were marked with the raw material codes. The auditors suggest that the bags should be marked prior to the transfer of raw materials to the bag to eliminate the possibility of a mix up later. This suggestion needs to be reflected in practice and procedure.

Target Completion Date: 4/30/97

2) Partial, open bags of raw materials are exposed to changes in humidity accumulation and potential contamination. Ameron needs to address this problem with a corrective action. Potential corrective actions would include taping bags closed or putting the opened bags into plastic boxes that can be sealed closed.

Target Completion Date: 7/31/97

RON NO: 01/97-001 RESPONSIBLE MANAGER(S): **H. Kline, S. Bosan**

1) Ameron needs to make sure that the "Certified Product Alert Notice" show up on the computer system for all of the "Nuclear products".

Target Completion Date: 6/30/97

2) A "sign-off" procedure needs to be instituted where the "authorized" approval of changes to Nuclear formulas includes a signature to a statement indicating that the current revised version of the formula has been reviewed and the indicated changes to the formula will not affect the essential characteristics / properties of the formula as it had been previously qualified for Nuclear applications. Signature Date

Target Completion Date: 7/31/97

3) More inclusive documentation i.e.. test results cross referenced and indicated on the formula version history, as well as, some text explanation of the technical justification for the formula version change. Not just and indication of the change that is being made but also some information as to why that change is being made.

Target Completion Date: 7/31/97

4) 3366 and 3367 require back-tracking to make up the product definition / documentation of the product criteria on a Product Change Order or Development Criteria sheet.

Target Completion Date: 7/31/97

ON NO: 01/97-001 Continued

5) The Auditors suggested setting up "master" Nuclear product files for each product so "all" the information pertaining to that product could be more easily accessed during future NUPIC audits.

Target Completion Date: 6/30/97

6) Review the following Work Instructions applicability and current application and revise accordingly:

a) WI012

b) WI015

c) WI019

d) WI020

Target Completion Date: 6/30/97

RON NO: 01/97-002

RESPONSIBLE MANAGER(S): **R. Gasmena, J. Garnett S. McKown**

1) Generate list of Critical / Non-critical raw materials used in Nuclear batches. **RG**

Target Completion Date: 2/25/97 Completed

2) Establish procedure and responsibility to review this list for completeness and correctness on a periodic basis and when new, Nuclear grade formulas are added to the production mix. **RG**

Target Completion Date: 6/30/97

3) Determine in-coming raw material acceptance criteria for critical and non-critical raw materials: **RG.**

   a) Critical raw materials, 100% lot tested by Ameron QC

   Target Completion Date: 2/25/97 Implemented

   b) Non-critical raw materials accepted by Certificate of Analysis from Vendor

   Target Completion Date: 9/30/97

ON NO: 01/97-002 Continued

4) Establish methodology for transferring "acceptance" requirements to

a) Vendor's. (Utilize PO's to identify requirements for specific raw materials to the vendors.) **SM**

Target Completion Date: **7/31/97**

b) Ameron's In-coming Raw Material Receiving Personnel **JG**

Target Completion Date: **7/31/97**

RON NO: 01/97-003

RESPONSIBLE MANAGER(S): **M. Lamb**

1) Revise Section 1.0 of the Ameron Quality Manual to reflect the current Ameron International organizational status in text and charts.

Target Completion Date: 5/15/97

RON NO: 01/97-004 RESPONSIBLE MANAGER(S): **R. Gasmena, M. Lamb**

1) Contact B. Wilson to obtain a copy of his Lead Auditor Certification for historical file records. **RG**

Target Completion Date: 5/15/97

2) Problems with Certificate of Compliance: **ML**

   a) Ameron Order # 570680 for Wolf Creek needs to have Certs generated.

   Target Completion Date: 3/31/97

   b) Check other Nuclear Record files for completeness of paper work.

   Target Completion Date: 5/15/97

3) Calibration System needs to be brought up to date. Data sheets need to reflect As Found, As Adjusted, Date Checked and By Whom. **ML**

Target Completion Date: 4/30/97

RON NO: 01/97-005 RESPONSIBLE MANAGER(S): **M. Lamb**

1) Revise Work Instruction WI005 for:

   a) Periodic internal audits

   b) Periodic Management reviews

Target Completion Date: **5/15/97**

2) Management Reviews need to be documented better and evidence needs to be filed so that it is more accessible. Establish practice.

Target Completion Date: **7/31/97**

RON NO: 01/97-006 RESPONSIBLE MANAGER(S): **M. Lamb**

1) Implement the following Work Instructions:

a) WI094 Customer Interface

Target Completion Date: 6/15/97

b) WI099 Contract Review

Target Completion Date: 6/15/97

c) WI158 ? Nuclear Orders

Target Completion Date: 7/15/97

d) WI098 Auditor Qualifications

Target Completion Date: 7/15/97

RON NO: 01/97-007 RESPONSIBLE MANAGER(S): **G. Smith, M. Lamb**

1) Review WI099 and WI094 for accuracy, completeness and current application. **GS**

Target Completion Date: **5/15/97**

2) Develop method / procedure where all of the requirements of new, Nuclear orders are reviewed prior to acceptance of the initial PO. **GS**

Target Completion Date: **5/15/97**

3) Develop method / procedure where "all" Nuclear PO requirements are related to all of the personnel involved in the entire Nuclear production process from Raw Material procurement through Product Shipment. **GS**

Target Completion Date: **6/30/97**

RON NO: 01/97-008 RESPONSIBLE MANAGER(S): **M. Lamb, S. McKown**

1) Revise WI041 to reflect current practice. **ML**

Target Completion Date: 6/15/97

2) Implement procedure where our Quality System requirements are listed as part of the Ameron PO for calibration services. **SM**

Target Completion Date: 4/30/97

RON NO: 01/97-009 RESPONSIBLE MANAGER(S): **M. Lamb**

1) Revise WI004 to reflect current practice.

   a) Indicate that Ameron will conduct audits of suppliers and / or do incoming calibration check to verify calibration services' work.

   b) Establish an Audit Schedule for Calibration Services.

Target Completion Date: 6/15/97

2) Set up master file for all calibration services used.

Target Completion Date: 5/15/97

RON NO: 01/97-010

RESPONSIBLE MANAGER(S): **R. Gasmena**

1) Establish method / procedure to inform Raw Material Receiving personnel of the individual raw material receiving requirements.

Target Completion Date: 9/30/97

2) Review Raw Material Procurement Sheet requirements for critical / non-critical Raw Materials for Nuclear products.

Target Completion Date: 9/30/97

3) Set up method / procedure to require identification of QC personnel conducting individual tests and M & TE used on individual tests during QC Raw material Testing. These records need to allow traceability to training records and M & TE calibration records for Nuclear "critical" raw materials.

Target Completion Date: 8/31/97

RON NO: 01/97-011 RESPONSIBLE MANAGER(S): **M. Lamb**

1) Calibrate M & TE that is due for calibration / remove from service.

Target Completion Date: 4/30/97

2) Document Calibration on SN0002 Scale and SNC11 Wt/gal cup.

Target Completion Date: 2/19/97 Completed

3) Define calibration procedures which are needed. Write and implement these Work Instructions as required.

Target Completion Date: 10/15/97

4) Write and implement Work Instructions for Receiving personnel indicating that new, in-coming M & TE and returning M & TE which has been sent out for calibration must first be routed through QA for verification and entry into the calibration system and then forwarded to the department that has purchased the equipment.

Target Completion Date: 10/15/97