CMW

CIRCLEVILLE METAL WORKS, INC.

March 15, 1988

Mr. James C. Stone
Acting Chief
Vendor Inspection Branch
Division of Reactor Inspection and Safeguards
Office of Nuclear Reactor Regulation
Washington, D.C. 20555

Dear Sir:

This letter is in response to your letter concerning the inspection of Circleville Metal Works, Inc. on January 11-14, 1988, and the findings by your staff. Reference Docket No. 99901075/88-01.

We wish to inform you of the corrective actions that have been taken, the steps taken to prevent recurrence, and when these steps were taken.

Item 1 of your Appendix A was corrected as follows:

The purchase order for the tubing was issued under the Q.A. Program of Eggers Ridihalgh Partners (ERP) without review by CMW Inc.'s Q.A. Manager. Until the time of the audit, CMW, Inc. was operating under the impression that material supplied and purchased by their customer under their Q.A. Program was not required to be controlled by CMW, Inc.'s Q.A. Program. A copy of the material certification and purchase order was not supplied to CMW, Inc. until the first set of baskets constructed with the tubing was shipped to the customer. After reviewing the material certification, CMW, Inc.'s Q.A. Manager noted that the certification paper lacked the ASTM designation, was missing the chromium and nickel valves, and did not include the mechanical properties. He did not sign the certification due to these deficiencies. The material was placed on hold January 14, 1988, and a Non-Conformity Report Form 5A was completed by CMW's Q.A. Manager. In accordance with ASTM specifications, samples of the tubing were tested to determine if they met the mechanical requirements. A report dated January 15, 1988, issued by the testing lab, confirmed that the material did meet the mechanical requirements of ASTM B241. On January 13, 1988, the tubing manufacturer issued to CMW, Inc. a corrected copy of the test report showing the actual amounts of chromium and nickel to be .00%. Due to the complete lack of these two elements the original certification was issued showing no percentage for these two elements. It is now understood that all material purchased by or for CMW controlled items shall be reviewed prior to placement of the order by CMW's Q.A. Manager, and that no material shall be issued for use until complete certification has been received and reviewed in accordance with CMW's Q.A. Program.

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Item 2 of your Appendix A was corrected as follows:

The requirement that all material be purchased to ASTM/ASME Section II was applied to the materials purchased new for the bolt removal tool. However, the material in question was taken from CMW stock, and it was recognized at the time that no ASTM/ASME specification was listed on the material certification. The Q.A. Manager did compare the results of the testing with the ASTM/ASME Section II Manual and found that they did meet all the requirements on November 10, 1987. He did not note this comparison on the material test report or obtain a copy of QQ-A-200 to compare to ASTM SB11. The material was placed on hold on January 11, 1988, and a Non-Conformity Report Form 5A was completed. A copy of QQ-A-200 was obtained for comparison to ASTM SB211. The material was found to comply with both specifications. The Q.A. Manager noted this on the material certification and released the material for use on January 14, 1988. Future recurrences will be avoided by obtaining all of the required specifications prior to releasing material for fabrication as outlined by CMW's Q.A. Program.

Item 3 of your Appendix A was corrected as follows:

Based on the weld rod manufacturer's recommendation that open rod containers be stored in a warm, dry place, thermometers were placed in the rod ovens to monitor the storage temperature. The thermometers were not intended to measure a specific temperature, but were used as a guide for the welder to show that the rod was being stored in a warm enough environment to reduce the possibility of moisture retention in the rod coating.

In the case of the thermometer used to monitor the parts being checked with liquid penetrant, maintenance of the temperature between 60°F and 125°F is only a guide and in fact may be varied through demonstration of a technique at greater or lower temperatures which is achieved by lengthening or shortening (soak) dwell time of the penetrant.

Since neither instance dictates that the exact temperature be known or recorded and that no sections of the ASME Code were being violated, it was decided and agreed upon by all parties involved to remove the temperature monitoring thermometers from the calibration system when used for weld rod ovens and penetrant testing. CMW has attempted to purchase thermometers with a guaranteed accuracy of ±2° by the manufacturer.

On January 15, 1988, the Quality Control Manual was revised to remove temperature gauges from the calibration system, however, serial numbers are still assigned to them and they will be replaced anytime there is reason to believe that they are in error.

Should you have any questions concerning this response, please feel free to contact us.

Sincerely,

CIRCLEVILLE METAL WORKS, INC.

Joe E. Riddlebarger

Joe E. Riddlebarger
Quality Assurance Manager

cc: Herman Crawford, ERP
Howard Sobel, EIC

JR/s