



AUGUST 24, 1988

UNITED STATES NUCLEAR REGULATORY COMMISSION
OFFICE OF NUCLEAR REACTOR REGULATION
DIVISION OF REACTOR INSPECTION AND SAFEGUARDS
WASHINGTON, DC 20555

ATTENTION: E. WILLIAM BRACH, CHIEF
VENDOR INSPECTION BRANCH

REFERENCE: NRC LETTER - DOCKET 99900403/88-01
AUGUST 4, 1988

DEAR MR. BRACH:

THIS IS IN RESPONSE TO YOUR AUGUST 4, 1988 LETTER WHICH CONTAINED THE RESULTS OF THE NRC INSPECTION AT GE NUCLEAR ENERGY FACILITIES IN SAN JOSE, CALIFORNIA DURING THE PERIOD FEBRUARY 1-10, 1988. THE VICE PRESIDENT AND GENERAL MANAGER, B. WOLFE, HAS REQUESTED THAT I RESPOND TO YOUR LETTER ON HIS BEHALF.

THE INSPECTION REPORT IDENTIFIES ONE NONCONFORMANCE. THE STATEMENT OF NONCONFORMANCE AND OUR RESPONSE IS CONTAINED IN THE ATTACHMENT TO THIS LETTER.

SINCERELY,

J. M. CASE, MANAGER
NUCLEAR QUALITY ASSURANCE

VMW
ATTACHMENT

CC: B. WOLFE

ATTACHMENT

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NRC STATEMENT OF NONCONFORMANCE

CONTRARY TO SECTIONS 4 AND 7 OF GE TOPICAL REPORT NEDO-11209-04A, AND GE QUALITY ASSURANCE PROCEDURE QAP 2.4 AND 2.7, GE PROCURED 100 REPLACEMENT METRIC PHILLIPS FLAT HEAD SCREWS FOR USE IN THE REACTOR MODE SWITCH HOUSING ASSEMBLY WITHOUT PURCHASE DOCUMENTS AND WITH NO VERIFICATION OF THE QUALITY OF THE MATERIAL RECEIVED BY INCOMING RECEIPT INSPECTION. (REFER TO NONCONFORMANCE NO. 88-01-01.)

GE RESPONSE TO NONCONFORMANCE

THE 100 FLAT HEAD SCREWS WERE PURCHASED ON 3-31-80 BY THE RESPONSIBLE MODE SWITCH DESIGN ENGINEER (MR. MILAM) WITHOUT A WRITTEN GE SPECIFICATION OR PURCHASE ORDER AND WITHOUT A RECEIVING INSPECTION BY QUALITY ASSURANCE. GE ACKNOWLEDGES THAT THIS ACTION WAS IN TECHNICAL NONCONFORMANCE WITH GE PROCEDURES; HOWEVER, THE RESPONSIBLE ENGINEER TOOK PERSONAL RESPONSIBILITY FOR VERIFICATION OF THE ADEQUACY AND QUALITY OF THE MATERIAL RECEIVED, AND TOOK APPROPRIATE ACTION TO FORMALLY DOCUMENT THE FLAT HEAD SCREW REQUIREMENTS ON A GE DRAWING SO THAT SUBSEQUENT PURCHASES COULD BE MADE IN FULL COMPLIANCE WITH GE PROCEDURES. QC INSPECTION AT SWITCH/CAN ASSEMBLY AND SUCCESSFUL COMPLETION OF QUALIFICATION TEST ASSURED ADEQUACY OF THE SCREWS FOR THEIR FUNCTION IN THE MODE SWITCH.

SUBSEQUENTLY, THE MODE SWITCH DESIGN WAS CHANGED (IN 1983) TO DISCONTINUE USE OF THESE SCREWS. THIS FACT WAS CONFIRMED BY THE NRC IN THEIR REPORT 99900403/87-03.

THE 100 FLAT HEAD REPLACEMENT SCREWS PURCHASED BY THE GE RESPONSIBLE DESIGN ENGINEER WERE BOUGHT AS IDENTICAL TO THE ORIGINAL MODE SWITCH SCREWS EXCEPT FOR LENGTH. WE CONSIDER THAT THE CIRCUMSTANCES OF THIS NONCONFORMANCE TO GE PROCEDURES IN 1980 WERE HIGHLY UNUSUAL AND AN ISOLATED CASE. NO EVIDENCE OF SIMILAR GE PURCHASES HAS BEEN DETECTED DURING THE MULTIPLE GE, CUSTOMER AND NRC INSPECTIONS AND AUDITS OF GE PRODUCTS. THIS 1980 PROCEDURAL NONCONFORMANCE IS NOT CONSIDERED TO HAVE ANY SAFETY SIGNIFICANCE. THE IDENTIFICATION OF THESE SCREWS ON A GE DRAWING (COMPLETED IN APRIL 1980) WAS AN APPROPRIATE CORRECTIVE AND PREVENTIVE ACTION FOR THIS ISOLATED CASE.