

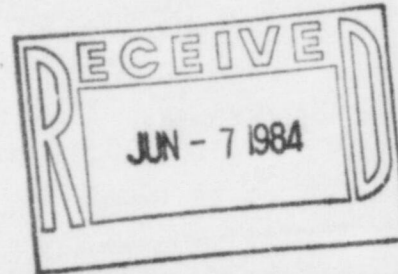
Switchgear Products Division

BBC Brown Boveri, Inc.
Rte. 309 & Norristown Road
Spring House, PA 19477
Phone: (215) 628-7400

June 1, 1984

Docket No. 99900329/84-01

Mr. Uldis Potapovs, Chief
Vendor Program Branch
Division of Quality Assurance
Safeguards, and Inspection Programs
U.S. Nuclear Regulatory Commission
611 Ryan Plaza, Suite 1000
Arlington, Texas 76011



Dear Mr. Potapovs:

This report is in response to the Notice of Nonconformance issued by your office as a result of the inspection conducted by Mr. W. E. Foster and Mr. D. Weber at the Tulsa Operation on March 26-30, 1984.

The Tulsa Operation, in conjunction with the Spring House facility has reviewed the Notice of Nonconformance and, where applicable, corrective action has been or will be implemented.

Nonconformances

- A. Concerning Items A, G, H and I on the Notice of Nonconformance Report No. 99900329/81-01, the current report (84-01) states that "personnel had not been advised of or had failed to comply with stated corrective action".
- Item A; Concerning "self audits", this was addressed in paragraph 3.18.2 of the QAM and paragraph 4.11 of QAP 18.2, Rev. 6. Personnel advisement was accomplished by the revisions identified above which were issued to individuals or work stations who are responsible for the work.
- Item G; Concerning Manufacturing Procedure 2.1, this was revised as required and personnel advisement was accomplished by revisions of procedures and issuance to responsible personnel. The failure to maintain cleaning logs will be addressed below in Item A-1.
- Item H; Concerning Manufacturing Procedure 2.4, this procedure was revised as agreed to and again personnel advisement was accomplished by issuance of procedures.
- Item I; Further corrective action will be instituted. (Reference Item 3 below).
1. As noted there was a lack of entry on the daily recording chart for 2/22/84. Subsequent investigation has revealed that the system was shut down on that date, therefore readings were not taken.

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The lack of an entry for 1/16/84 was a documentation error on the operator's part. The readings taken on the 16th were entered incorrectly as the 15th, which was a Sunday.

Quality of work - The upper right hand corner of the recording chart requires observation at the time the temperatures are recorded. The checklist provides no space for this subjective evaluation of components. If corrective action is required as a result of the parts inspection, the chart requires documentation of the corrective action taken. The procedure will be revised to further clarify the original intent by 7/15/84.

2. The chemicals utilized in the cleaning solution are capable of much higher temperatures than the 110°F - 120°F maintained by the Tulsa Operation. This temperature is maintained at the specified levels for reasons of economy. When the cleaning system is shut down the temperatures will slowly rise as evidenced by the readings documented on 2/21 and 3/12. However as shown on the recording charts, procedures were adequately followed as when the next readings were taken, the temperature had returned to the specified limits.
 3. To correct the noted deficiencies additional training will be provided for those individuals responsible for assuring that the calibration frequency of crimp tools is maintained. Crimp tool calibration will be maintained for all tools regardless of whether or not they are required for production use at the time. To prevent recurrence hand crimpers will be controlled through the Quality Control Department instead of Manufacturing, and crimpers not in use will be kept locked up in the inspection office.
- B. Internal audits are performed once each calendar year in accordance with Paragraph 4.6 of the Quality Assurance Procedure 18.2.

Comments addressing Criterion V were recorded on the audit checklist and the page was initialed and dated. The auditor mistakenly omitted the checks in the appropriate boxes provided on the checklist. The boxes are provided for subjective evaluation of compliance to the requirements stipulated and are labeled as satisfactory, unsatisfactory, or not applicable.

This omission had been corrected when detected during a previous audit and the auditor will exercise more care in compiling future audit reports in order to prevent recurrence.

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- C. In order to assure adequate corrective action, all vendor history cards will be reviewed and updated on an ongoing basis as components/supplies are received. Present history cards will be retired and new ones will be generated with all appropriate information entered.

Complete revision to all active history cards should be completed by 10/30/84.

To prevent recurrence personnel changes have recently been instituted in the receiving inspection area and appropriate training is being provided to assure full compliance to Quality Assurance Procedure 7.1-T. Training which is an ongoing process will be documented as it is accomplished.

- D. Engineering Standards Control is the responsibility of Standards Engineering Spring House, Pa. Standards are initiated and/or revised in accordance with documented procedures which are maintained by Standards Engineering. (Reference drawing 825534, Rev. 62).

Corrective action will require the Tulsa Operation to revise internal Engineering Procedures to describe internal control of standards drawings received from Spring House. To prevent recurrence Engineering will comply with documented procedures. The procedure revision and review will be completed by 7/15/84. In addition, Tulsa Engineering will review present standards and assure that the latest revisions are on file.

- E. BBC Brown Boveri does not concur that the "lack of (detailed) inspection records for crimped (wire) terminals" constitutes a nonconformance. Procedures as written do not always require that all items inspected and found to be acceptable are identified and documented in a detailed listing. Approved procedures which have been in use for many years require that the inspector indicates on the checklist that the wiring has been inspected and that items to be corrected are identified on the appropriate correction list. Rework of items requiring correction are signed off on the correction list and the required reinspection is also signed off.

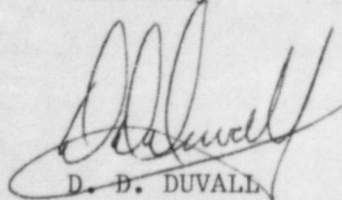
Identification and documentation in detail of all items inspected and found to be acceptable is a matter of judgement and experience.

BBC Brown Boveri does record detailed and generalized inspection data during final test and inspection to the extent that experience and specifications deemed necessary or significant. Including a requirement to record in detail the specific sample of terminals inspected would require additional work and maintenance of records which would not be cost effective or add to the safety, functional capability or integrity of the equipment.

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

Sincerely



D. D. DUVALLE
Vice President

DDD/jm

cc: W. E. Laubach
F. E. Novak
D. W. Pratt
D. R. Purkey
E. W. Rhoads
W. D. Tener