



November 14, 1997

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

RE: Reply to a Notice of Violation, Docket No. 999-0003

Dear Sirs:

This letter contains information concerning activities conducted by Guardian Automotive Trim, Inc., in response to the discovery of the missing anti-static air gun and the Notice of Violation packet we received. A revised procedure has been developed to control the use of the air guns. The procedure is being incorporated into our QS 9000 procedures. This will provide us with a well defined and controlled system for properly handling the air guns.

The missing air gun (NRD, Inc. Model P-2051) has not been found and is presumed to have been disposed of as ordinary waste. The reason for the violation was lack of knowledge by some employees on the proper handling of the air guns. The following is a list of actions that have been or will be conducted to assure proper control of the air guns:

- Plant records were reviewed to determine the number of anti-static airs issued to plant personnel. An inventory was then conducted to locate all the air guns and to compare the inventory findings to plant records. It was discovered that two additional P-2051 anti-static air guns could not be located. The air guns (SN 87863 and SN 89637) are presumed to be lost or disposed of as ordinary trash.
- A Corrective Action Team was assembled to implement immediate corrective actions and to develop a revised procedure for the air guns. The team consisted of department supervisors directly responsible for the use of the guns, the plant Environmental Engineer and the Maintenance Supervisor in charge of purchasing and returning the air guns to the manufacturer. The meeting was conducted on November 07, 1997.
- All employees were immediately notified by department supervisors of the special handling need of the anti-static air guns. This was accomplished on or before November 07, 1997.
- The Corrective Action Team suggested several revisions to the current procedure for the air guns. The new procedure is aimed at increasing employee recognition of the air guns and improved communication of the special nature of the air guns. The following items will be included in the new procedure and should be in use on or before December 01, 1997:

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PDR QA999 E*****
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GUARDIAN AUTOMOTIVE TRIM, INC.

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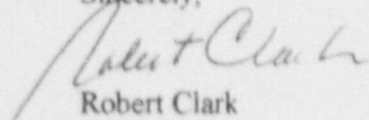
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- 1) The handle portion of the air guns will be painted a distinctive color. This will make the air guns easier to differentiate from our common air tips.
- 2) Training on the use of the air guns will be added to a existing housekeeping/safety training program for employees. This will aid in employee knowledge and recognition.
- 3) Work orders will be prepared and issued every two weeks to account for all air guns and to be sure all are properly labeled and recognizable.
- 4) A spare air gun will be controlled by the Maintenance Supervisor for special projects and testing. This will prevent employees from "borrowing" an air gun for special projects.
- 5) A revised issuance process has been developed. Previously, the Maintenance Supervisor would issue air guns to the department supervisor. Occasionally, the air guns would be moved without notifying the Maintenance Supervisor. This practice has been stopped. The new procedure requires the air guns be returned to the Maintenance Supervisor. The Maintenance Supervisor will then issue the air guns to the appropriate department supervisor.
- 6) A new tracking form will be issued with the air guns. The tracking form contains a picture of the air gun and instructions on its use and handling. The air gun and tracking form will be assigned a particular location or machine number. The air gun may not be moved except by the department supervisor. To move a gun location the supervisor will collect the old tracking form and the air gun. The department supervisor will prepare a new form prior to moving the air gun. This will enable the various department supervisors to control the use of the air guns in their areas.
- 7) The above items will be audited to determine if the new procedure is effective. The procedure will be modified as necessary to correct any deficiencies.

Guardian Automotive realizes the importance of the proper handling of the anti-static air guns. It is our belief the above detailed actions will correct any past handling problems with the air guns.

If you need any additional information or have any questions please contact, William Peters, at (812) 473-6323.

Sincerely,



Robert Clark
Plant Manager

cc: Regional Administrator
William Peters