

Westinghouse
Electric Corporation

Switchgear Divisions

700 Braddock Avenue
East Pittsburgh Pennsylvania 15112

October 13, 1983

United States Nuclear
Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Attention: Mr. Uldis Potapovs, Chief
Vendor Program Branch

Subject: Response to Inspection Report
Docket No. 99900330/83-01

Dear Mr. Potapovs:

This letter is in response to the subject inspection report, Appendices A and B. For clarity, the Notice of Violation and the three items in the Notice of Nonconformance are repeated in our response.

NOTICE OF VIOLATION

As a result of the inspection conducted on August 1-4, 1983, and in accordance with Section 206 of the Energy Reorganization Act of 1974 and its implementing regulation 10 CFR Part 21, the following violation was identified and has been categorized in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 47 FR 9987 (March 9, 1982):

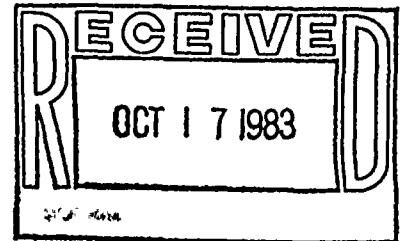
Section 21.6 of 10 CFR Part 21 dated December 30, 1982, states, in part, "(a) Each . . . corporation . . . subject to the regulations in this part, shall post current copies of the following documents . . . (1) the regulations in this part"

Contrary to the above, the copy of 10 CFR Part 21 that was posted was not the current issue dated December 30, 1982.

This is a Severity Level V violation (Supplement VII).

WESTINGHOUSE RESPONSE

At the time of your inspection on August 1-4, 1983, the Westinghouse Corporate Council for the Implementation of 10 CFR 21, which provides the posters for



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all the affected Westinghouse Divisions, had completed a revised poster with revisions promulgated up to and including January 10, 1983. However, this revised poster had not yet been distributed by the Corporate Council. The revised poster has now been received and was posted on August 17, 1983.

The Corporate Council advises us that it is their practice to provide us posters with the updated version of 10 CFR 21 as soon as practicable after revisions are promulgated and that they will continue to do so. I will assure that any revised posters will be posted promptly on receipt by me.

In this regard, I have been advised by the Corporate Council that a revision of the poster is currently in preparation to reflect the change in the telephone number for Region III which went into effect September 12, 1983. As stated above, I will post this revision as soon as I receive copies.

NOTICE OF NONCONFORMANCE

- A. A Westinghouse letter (NS-EPR-2762) dated May 6, 1983, to the Nuclear Regulatory Commission (E. P. Rahe to H. Denton) states, in part, regarding replacement DS-416 undervoltage trip devices (UVTs), "After the . . . failures at McGuire, replacement units were required to be manufactured . . . Since the . . . problem at McGuire was linked to manufacturing control of critical dimensions on selected parts, 100% quality control checks of the . . . critical parts were instituted in the new procedure. Those parts were labeled 'critical' meaning only that they would henceforth be subject to 100% dimensional checks'"

Contrary to the above, it could not be established from available inspection records that all of the critical parts of 21 replacement UVTs had received the required 100% quality control checks. For example, the records on file indicated that only 1 roller (72004CK02E), 4 C-rings (70610DB20C), 5 pins (8058A62H01), and 16 bracket pin assemblies (436B787G02) had been inspected for the 21 UVTs contained in Shop Order Nos. 02YN192, 02YN193, and 02YN194.

WESTINGHOUSE RESPONSE

We acknowledge that detailed 100% dimensional inspection records are not available for the items identified in the Notice of Nonconformance. However, documentation does exist, and is available for your review, that provides evidence that the 100% dimensional inspection of the selected parts was performed. This documentation consists of "G" letters, signed by responsible Switchgear Division personnel, that indicate that the 100% dimensional inspections were performed.

1. The first part of the report deals with the general situation of the country and the progress of the work of the Commission. It is divided into two main sections: the first section deals with the general situation of the country and the second section deals with the progress of the work of the Commission.

2. The second part of the report deals with the specific work of the Commission. It is divided into three main sections: the first section deals with the work of the Commission in the field of education, the second section deals with the work of the Commission in the field of health, and the third section deals with the work of the Commission in the field of social welfare.

3. The third part of the report deals with the conclusions of the Commission. It is divided into two main sections: the first section deals with the conclusions of the Commission in the field of education, the second section deals with the conclusions of the Commission in the field of health, and the third section deals with the conclusions of the Commission in the field of social welfare.

4. The fourth part of the report deals with the recommendations of the Commission. It is divided into two main sections: the first section deals with the recommendations of the Commission in the field of education, the second section deals with the recommendations of the Commission in the field of health, and the third section deals with the recommendations of the Commission in the field of social welfare.

5. The fifth part of the report deals with the annexes. It is divided into three main sections: the first section deals with the annexes to the report, the second section deals with the annexes to the report, and the third section deals with the annexes to the report.

6. The sixth part of the report deals with the conclusions of the Commission. It is divided into two main sections: the first section deals with the conclusions of the Commission in the field of education, the second section deals with the conclusions of the Commission in the field of health, and the third section deals with the conclusions of the Commission in the field of social welfare.

7. The seventh part of the report deals with the recommendations of the Commission. It is divided into two main sections: the first section deals with the recommendations of the Commission in the field of education, the second section deals with the recommendations of the Commission in the field of health, and the third section deals with the recommendations of the Commission in the field of social welfare.

8. The eighth part of the report deals with the annexes. It is divided into three main sections: the first section deals with the annexes to the report, the second section deals with the annexes to the report, and the third section deals with the annexes to the report.

This documentation provides evidence that 100% dimensional inspection was performed, even though this documentation does not provide specific details of the dimensional inspection (i.e., Form QCI 21-1).

Further, 100% of the assembled UVTDs were dimensionally inspected and functionally tested in accordance with documented procedures. The results of these inspections and tests are available for your review.

The inspection of the parts selected for 100% dimensional inspection prior to assembly of the 21 replacement UVTDs was performed using evolving procedures that resulted in incomplete detailed dimensional inspection records. In order to prevent recurrence of this nonconformance, inspections on future UVTDs will be performed in accordance with documented instructions that require identifiable documentation of the inspection of the UVTD parts selected for 100% dimensional inspection.

The above reaffirms that Westinghouse actions taken to date and planned for the future are in full compliance with the commitments made to the NRC in letter #NS-EPR-2762 (from E. P. Rahe, Jr., to H. Denton, dated 5/6/83).

NOTICE OF NONCONFORMANCE

- B. Criterion V of Appendix B to 10 CFR Part 50 states, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

Paragraph 6.1.1.2 of the Switchgear Division Quality Assurance Manual (QAM) states, in part, "Manufacturing policy is that fabrication and assembly will be done according to the drawing and revision called for on the work order or shop order information."

Contrary to the above, the shop order information issued for replacement UVTDs did not identify the applicable drawing revisions to be used for the required 100% inspection of "critical items." For example, the bulk order for UVTDs destined for nonoperating plants (i.e., Shop Order No. 02YN202) did not have Drawing Nos. 788A594 and 591C656 identified by revision status.

WESTINGHOUSE RESPONSE

We acknowledge that revision numbers for Drawings 788A594 and 591C656 were missing from the information issued on Shop Order 02YN202. Change notices

The following information was obtained from the records of the Department of the Interior, Bureau of Land Management, regarding the land owned by the United States in the State of California.

The land is located in the County of San Diego, State of California, and is situated in the Township of San Diego, Range 14 North, and Section 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100.

The land is situated in the Township of San Diego, Range 14 North, and Section 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100.

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LAND OWNED BY THE UNITED STATES

The land is situated in the Township of San Diego, Range 14 North, and Section 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100.

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LAND OWNED BY THE STATE OF CALIFORNIA

The land is situated in the Township of San Diego, Range 14 North, and Section 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100.

have been issued on this shop order to add the applicable revision numbers. We have determined that the applicable revision numbers were used in the inspection of the critical parts in question.

To prevent recurrence of this nonconformance, responsible Switchgear Division personnel will be instructed to assure that applicable revision levels will be specified in the shop order information for all critical parts identified for 100% inspection. No future orders for Class 1E UVTDs will be released for manufacture before this instruction is completed.

NOTICE OF NONCONFORMANCE

- C. Criterion V of Appendix B to 10 CFR Part 50 states, in part, "Activities affecting quality . . . shall be accomplished in accordance with . . . instructions, procedures, or drawings"

Item 2 of Purchase Order No. 54X470254 (Shop Order No. 02YN192) requires issue of Certificates of Conformance for each UVTD to certify compliance with the purchase order technical requirements.

Contrary to the above, Certificates of Conformance were on file for only five replacement UVTDs of the eight that had been shipped on Purchase Order No. 54X470254 to the McGuire site.

WESTINGHOUSE RESPONSE

During the inspection, a Certificate of Conformance dated 4/4/83 for a quantity of two UVTDs, and a Certificate of Conformance dated 4/13/83 for a quantity of three were examined. We later found that the original copy of the 4/4/83 Certificate of Conformance had been voided as these two devices were never delivered to the site. The 4/13/83 Certificate of Conformance is valid as will be explained below.

On 4/5/83, two UVTDs were shipped. On 4/7/83, we learned that both devices had incorrect pins, and they were recalled. On 4/11/83, we delivered six devices. On inspection at the site, one was found to have one dimension out of specified tolerance. That device was brought back to East Pittsburgh. On 4/13/83, we shipped 3 devices.

We have on file a Certificate of Conformance dated 4/5/83 for two devices, a Certificate of Conformance dated 4/8-4/9/83 for six devices, and a Certificate of Conformance dated 4/13/83 for three devices. These Certificates cover a total of eleven devices shipped to McGuire, of which three were returned, leaving eight at the site.

The Certificates of Conformance dated 4/5/83 and 4/8-4/9/83 were located subsequent to the inspection of 8/1-8/4/83.

1. The first part of the document is a list of names and addresses of the persons who have been interviewed by the Committee. The names are listed in alphabetical order, and the addresses are given in full.

2. The second part of the document is a list of the questions which were asked of the persons interviewed. The questions are listed in alphabetical order, and the answers are given in full.

APPENDIX A

3. The third part of the document is a list of the names and addresses of the persons who have been interviewed by the Committee. The names are listed in alphabetical order, and the addresses are given in full.

4. The fourth part of the document is a list of the questions which were asked of the persons interviewed. The questions are listed in alphabetical order, and the answers are given in full.

5. The fifth part of the document is a list of the names and addresses of the persons who have been interviewed by the Committee. The names are listed in alphabetical order, and the addresses are given in full.

APPENDIX B

6. The sixth part of the document is a list of the names and addresses of the persons who have been interviewed by the Committee. The names are listed in alphabetical order, and the addresses are given in full.

7. The seventh part of the document is a list of the questions which were asked of the persons interviewed. The questions are listed in alphabetical order, and the answers are given in full.

8. The eighth part of the document is a list of the names and addresses of the persons who have been interviewed by the Committee. The names are listed in alphabetical order, and the addresses are given in full.

9. The ninth part of the document is a list of the questions which were asked of the persons interviewed. The questions are listed in alphabetical order, and the answers are given in full.

CLARIFICATION

As requested by the inspector at the exit interview conducted at the end of the NRC follow-up inspection on September 22, 1983, we offer the following clarification of the subject of a possible Westinghouse design review of the circuit breaker shunt trip device:

Westinghouse Water Reactor Division is conducting two separate reviews of the addition of the shunt trip device to the automatic protection system. One of these reviews is of the electrical interface requirements necessary to add the shunt trip device to the automatic protection system, and the second review is of the interface of the shunt trip device with the breaker.

Currently, no detailed review of the shunt trip device itself has been conducted.

Very truly yours, .

D. B. Jones

D. B. Jones, Manager
Quality Assurance
Switchgear Division

Approved:

D. M. Sauter / D.M.S.

D. M. Sauter
General Manager
Switchgear Division

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