

rotork-actuation

your reference

our reference

date

REPLY TO NOTICE
OF NON CONFORMANCE

MRH/AMH/L0212B

2nd December, 1992

U.S. Nuclear Regulatory Commission
Washington DC
20555
USA
For the attention of the Document Control Desk

Dear Sir

NRC INSPECTION REPORT NO
RE: 99901066 92-01 - DATED 3RD NOVEMBER, 1992

In response to your critical report above, I reviewed the findings and respond as follows:

NON-CONFORMANCE 1.1.1 (NOTICE - ITEM A)

The selection and use of suppliers based entirely on the use of the DTI QA Register is recognised as being unacceptable for components which are to be Dedicated for nuclear use in line with the commercial grade dedication programme (CGI) outlined in EPRI 5652.

To comply with this requirement methods 2 and 3 will be utilised and occasionally method 1, (EPRI 5652).

Based on these principles Rotork will develop its own controls and procedures using ER187 as a guide, each safety related component will be allocated a dedication path which identifies route, method and suppliers.

This will result in the existing purchasing controls being supplemented with procedures for controlling the critical characteristics listed in ER187, the procedures include Audit procedures and programme and Component tests, inspection and checks

The control of the implementation of these dedication paths will involve all aspects of the company and necessitate the use of the lot control function of the new computer system currently be installed at Rotork.

The actions required to complete the implementation of a CGI Dedication programme are:

- i) Identify all Safety Related components (complete).
- ii) Produce individual component dedication paths
- iii) Create control procedures
- iv) Implement control procedures (audits/tests etc.)

The time scale set to complete items (ii) and (iii) is the end of June 1993. Item (iv) will involve numerous supplier visits and these will be prioritised and incorporated into the existing rolling audit programme.

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rotork-actuation
rotork company Rotork plc

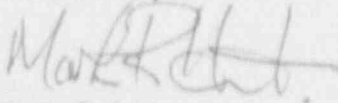
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NON-CONFORMANCE 1.1.2 (NOTICE - ITEM B)

The corrective action committed to the NRC in response to the audit finding 92-01-02 (Report 99901066/89-01) was completed and documented during the NCR visit 24 - 26th August, 1992. The failure to complete this action earlier has been documented on Rotork's internal Non-Conformance (NCF) system and the individual involved was left in no doubt as to his error of judgement (Ref: NCR 163499 attached). This is considered a unique occurrence and no further action is proposed.

I trust that you find these actions satisfactory.

Yours faithfully



Martin R Hunt
QUALITY ASSURANCE MANAGER

ENCS.

COPIES: GEM, FW, RHA, IJB, AW, NRC Chief Vendor Insp. Branch L J Norrholm

retork NON - CONFORMANCE REPORT No: 163499

ORIGINATOR COMPLETES	SERIAL NO. <u>N/A</u>		DATE: <u>28/8/92</u>					
	SIZE/TYPE <u>N/A</u>		WIRING DIAGRAM No.					
	Customer:		Supplier:					
	Contact:		Part No:					
	Site:		Reject Note No:					
	Contact:		P.C.B. Serial No:					
	Service Job Ref:		Location of Unit:					
	Operator Ident.	A	B	C	D	E	F	G
	Originators Report on Defect, Likely Causes and Suggested Actions: <u>FAILURE TO COMPLY WITH AN NCR.</u> <u>RESPONSE TO THE NCR, RAISED</u> <u>ON THEIR AUDIT 09/01/92 - 01, ALTHOUGH</u> <u>THE ACTION HAD BEEN COMPLETED & REVIEWED.</u> Originator: (print) <u>MR. HUNT</u> Qty Supplied/Produced: <u>1</u> Qty Inspected: <u>1</u> Qty Defective: <u>1</u>							Time/Cost
	OPERATOR/SERVICE ENGINEER COMPLETES	Rework Undertaken:		Re-Test PASS/FAIL				
		Ref. NCR No.						
<u>A DOCUMENTED REVIEW OF THE NCR AUDIT</u> <u>FINDING WAS COMPLETED & GIVEN TO THE</u> <u>NCR. AUDITORS DURING THEIR VISIT (26/8/92)</u> <u>BY THE INDIVIDUAL INVOLVED.</u>				Attachment				
Operator/Service Eng. (No.) Date				YES NO				
COMPLETE AS DIRECTED BY QUALITY ASSURANCE	Approved Action to Resolve:				TOTAL			
	Approve Above: YES/NO Concession No. (If Applicable)							
	If NO Define Alternative:							
	Quality Engineer: <u>MR HUNT</u>							
	Signed: <u>MR HUNT</u> Date: <u>28/8/92</u>							
	Attachment							
	YES NO							
	Corrective Action to Prevent Repetition:							
	Allocated to: Date:							
	Action to be Taken: <u>THE INDIVIDUAL (M. HUNT) INVOLVED IS</u> <u>FULLY AWARE OF HIS FAILURE TO MEET</u> <u>THE COMMITMENT & CAN GUARANTEE THAT IT</u> <u>WILL NOT OCCUR AGAIN. MR HUNT</u>							
Copies 1 and 2 for Q.A. review Copy 3 to Q.A. review Copy 4 return to Originator	Completed by: Date:				Attachment			
	YES NO							
	Review of Corrective Action:							
	Accept: YES/NO Further Action:							
	<u>NO FURTHER ACTION NECESSARY</u>							
	Corrective Action Complete: <u>MRH</u> Q.A. Date: <u>30/8/92</u>							
	Attachment							
	YES NO							
FAULT CODE		PRODUCT CODE		ORIGIN		QC6/A Rev1 COPY 1		
<u>J</u>		<u>NA/-/98/51</u>		<u>INT.</u>				
<u>FAILURE TO COMPLETE COMPREHENSIVE REPLY TO NCR.</u> <u>REPLY COMPLETED DURING NCR VISIT - INDIVIDUAL INFORMED!</u>								