May 15, 1985

United States Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Mr. Gary G. Zech, Chief
Vendor Program Branch
Division of Quality Assurance, Vendor
and Technical Training Center Programs
Office of Inspection and Enforcement

Reference: Your letter of March 7, 1985
Docket No. 99900279/84-01

Gentlemen:

Find as Attachment #1, our answer to the three (3) nonconformances listed in Appendix A of your letter of March 7, 1985.

Should you have any questions concerning these answers, we will be pleased to review them with you.

Sincerely,

J. V. Erhardt
Vice President, Engineered Controls Operation

JVE/nd

cc: Michael C. Veysey, Gould, Business Section Legal Counsel
Robert L. Harris, Telemecanique Inc., President

Attachments

IE:09
5-22-85
1/1

ATTACHMENT #1

A. Compliance to 10CFR50 APP B requirements was contractural invoked in Gould, Inc., ICD, Systems Operation purchase orders for the procurement of all NUCLEAR 1E designed and manufactured items. Suppliers of COMMERCIAL GRADE items were required to meet applicable 10CFR50 APP B requirements only to the extent of assuring that the items provided met the design and test requirements of the cited industry standards.

This procedure was based upon a just interpretation of this federal regulation's applicability. Since Siemens-Allis (formerly Gould) Bellefontaine, is a supplier of only COMMERCIAL GRADE items, this facility was and is exempted from compliance to 10CFR50 APP B. Gould Corporate did not choose to require any Gould facility to comply with 10CFR50 APP B except those providing BASIC COMPONENTS to nuclear facilities. Thereafter, Siemens-Allis chose to maintain a Quality Program considered adequate to assure compliance to the industry standards for their products.

Violation of federal requirements is not acknowledged.

B. As recommended by NEMA AB1 (1981), paragraph 2.38 titled "Field Tests", molded case circuit breakers are checked to determine that they will perform their intended function using the following procedures for new circuit breakers:

/1/ Inspect the breaker visually for physical damage.
/2/ Perform several mechanical ON-OFF operations.
/3/ Make a circuit continuity check on each pole with the circuit breaker in the closed position.

Additionally, circuit breakers are subjected to dielectric withstand test per NEMA ICS 1-109 after installation in a BASIC COMPONENT and are qualified seismically and environmentally prior to use in any nuclear application.

Circuit breakers are not overload tested after installation in a BASIC COMPONENT fundamentally because overload tests are Design Tests and not Production Tests.

NEMA AB1-2.38 Field Tests (NEMA AB-1 1981) states "On occasion, molded case circuit breakers of the time - delay/instantaneous type are checked to determine that they will perform their intended function of protecting electrical conductors against overloads. For this purpose, the following procedure is recommended:

1. New Circuit Breakers (A check for possible damage during shipment or storage.)
   a. Inspect the breaker visually for physical damage.
   b. Perform several mechanical ON-OFF operations.
   c. Make a circuit continuity check on each pole with the circuit breaker in the closed position.
   d. If desired, apply 300 percent of breaker rated continuous current to each pole to determine that the circuit breaker will trip on an overload. See Table 2-8, Page 22.

B. Continued....

No where does NEMA recommend that breakers by 100% tested to verify their performance under overload. In addition, NEMA AB1-2.38 does not recommend that the instantaneous magnetic portion of the breaker be tested.

Testing the breaker in the current level areas of the instantaneous magnetic trip will subject the circuit breaker to low fault level short circuits. NEMA Publication ICS.2.3 Section 11 Page 13 (1983) indicates,"If it is suspected that the circuit breaker has opened several short circuits or if there are signs of possible deterioration, replace the breaker or subject it to the test described in paragraph AB1-2.38.... before restoring it to service."

Subjecting circuit breakers to repeated low level short circuits will introduce the above cited conditions and thereby introducing repeated testing of the circuit breakers, therefore will create an uncertainty relative to the operation of the circuit breaker.

Telemecanique Inc. will continue to perform the overload test and instantaneous trip verification test when the end user specifically requires such test. Telemecanique Inc. does not believe it is in the best interest to have circuit breakers tested above and beyond the testing performed by the user in the field and will continue to abide by the current NEMA standard.

TE sees no violation of 10CFR50 APP B in relation to past or current procedures in regard to inspection and test.

C. Correspondence has been initiated to Operations Manager, ITE Electrical Products, Bellefontaine, Ohio requesting response to corrective action requested in Audit Report 820203, AFR#1, initially requested by letter QAL-820223 for 23 February 1982.