

December 3, 1996

Mr. Don F. Pedritti, President & General Manager
ABB-Electro Mechanics
150 John Downey Drive
New Britain, CT 06050-0750

SUBJECT: ABB-ELECTRO MECHANICS SEPTEMBER 16 AND NOVEMBER 26, 1996, REPLIES TO
NOTICE OF NONCONFORMANCE 99901297/96-01-01 (NRC INSPECTION REPORT
NO. 99901297/96-01)

Dear Mr. Pedritti:

Thank you for your September 16 and November 26, 1996, letters in response to our subject Notice of Nonconformance (NON).

In your September 16, 1996, letter, you indicated that ABB-EM plans to revise its Quality Assurance Procedure (QAP)-215, "Non-Conforming," and other appropriate procedures to require customer rejections to be documented. In your November 26, 1996, letter, you provided us a copy of the revised QAP-215.

We have reviewed your letters and find that your response to the NON is responsive to our concern.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be placed in the NRC's Public Document R (PDR).

Sincerely,

Original signed by:

Robert M. Gallo, Chief
Special Inspection Branch
Division of Inspection and Support Programs
Office of Nuclear Reactor Regulation

Docket No. 99901297

Enclosures: 1. ABB-EM letter dated September 16, 1996.
2. ABB-EM letter dated November 26, 1996,
and attachment QAP-215.

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September 16, 1996

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555-001

cc: Chief, Special Inspection Branch
Division of Inspection and Support Programs
Office of Nuclear Reactor Regulations
Washington, D.C. 20555-001

REPLY TO A NOTICE OF NON-CONFORMANCE
DOCKET NO: 99901297 (99901297/96-01)

Introduction:

ABB Electro-Mechanics (ABB E-M) was cited in the subject NRC Inspection Report for failure to take proper corrective actions to prevent a recurrence of deficiencies noted by customer final inspection results. The specific orders reviewed were two replacement part orders with RG&E for the Ginna Station. The deficiency cited by the NRC Inspection Report is that EM failed to take adequate corrective action to preclude recurrences of similar deficiencies.

Description of steps that were taken to correct non-conformances.

1. Regarding the first order, there was no immediate corrective action taken by ABB E-M at the time of the surveillance inspection during which the non-conformance was noted. RG&E issued NCR 92-100 (per RG&E Quality Release form) to facilitate action at Ginna Station, to resolve the non-conformance.
2. Subsequent to the R&GE's General Supplier Audit conducted in June 1993, ABB EM modified its internal methods for processing RG&E orders including the issuance of a formal company procedure (e.g. EMOF-126, Contract Control Requirements General Procedural Guidelines), to insure that RG&E purchase order requirements are incorporated to the satisfaction of RG&E prior to the point of release for shipment. This procedure involves the formal submittal, via Request for Review/Approval (RAR) form, of certain ABB EM order processing documents to RG&E for their comment and approval to insure agreement on how order requirements will be met prior to completion of the order.
3. The noted deficiency related to the second order involved the disapproval on an RAR submitting various process documentation for comment/approval. RG&E's concerns were similar to the issues raised on the first order. ABB EM addressed RG&E's concerns and resubmitted the documentation by RAR. The revised RAR and documentation were approved on 06/03/96 and the equipment was shipped.

ABB Electro-Mechanics

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Description of steps that will be taken to correct non-conformances

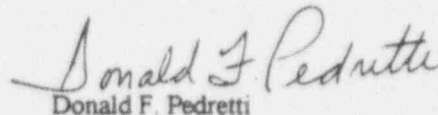
ABB E-M Quality Assurance Procedure QAP-215 "Non-Conforming" items will be revised to include customer discovered non-conformance's as follows

1. Customer Rejections of items found to be in non-conformance during surveillance inspections shall be documented on Problem Disposition Report forms (PDR) per QAP 221 and dispositioned in accordance with the procedures as indicated in the referenced QAP.
2. The PDR's generated during the surveillance inspections for a particular customer will be jointly reviewed by ABB EM Contracts, ABB EM Engineering and ABB EM Quality Assurance, as a minimum, on receipt of order from that customer. The intent of that review is to insure that the specific requirements of their order will be met. ABB EM will revise the appropriate QA procedures to accomplish and document these reviews.

Dates corrective actions and preventive measures will be completed

Changes to Procedures as defined above will be completed on or before December 2, 1996.

Yours truly,



Donald F. Pedretti
ABB E-M General Manager



November 26, 1996

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555-001

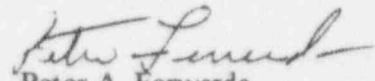
cc: Chief, Special Inspection Branch
Division of Inspection and Support Programs
Office of Nuclear Reactor Regulations
Washington, D.C. 20555-001

Reference To Notice of Non-Conformance
Docket No.: 99901297 (9991297/96-01)

Dear Sirs::

In the ABB Electro-Mechanics reply of September 16, 1996 to the notice of non-conformance on the reference docket we committed to revision of our document QAP 215. Attached to this correspondence is the revised document for your file.

Yours truly,


Peter A. Ferwerda
Quality Assurance Manager

cc: J. W. Davis
A. A. Oja
D. F. Pedretti
W. J. Wayland
S. L. Packard
W. L. Hadovski

ABB Electro-Mechanics

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9612040242 + P



REVISION DATE: 11/25/96

QUALITY ASSURANCE PROCEDURE

QAP 215

NON-CONFORMING ITEMS

REFERENCE QAM 200 SECTION 15

APPROVED /s/Peter Ferwerda DATE 12/14/90
QUALITY ASSURANCE MANAGER

APPROVED /s/J. W. Davis DATE 12/14/90
DIRECTOR OF OPERATIONS

9612040246 SPP



NON-CONFORMING ITEMS

REVISION DATE	REVISION RECORD	APPROVAL
12/14/90	1. Revised to obtain new management approval and computer control. 2. Revised Section 3 for references. 3. Added Section 4 (old Section 3).	/s/Peter Ferwerda /s/J. W. Davis
6/3/96	1. Reformatted procedure.	/s/Peter Ferwerda /s/J. W. Davis
11/25/96	1. Added paragraphs 4.3 & 4.4.	<i>P. Ferwerda 11/25/96</i> <i>ccg kjwd 11/25/96</i>

1. SCOPE

This procedure specifies the measures to be followed in processing non-conforming items.

2. GENERAL

Items acquired or intended for use which do not meet the requirements of the prescribing document will be identified and processed as required to prevent inadvertent use.

3. REFERENCES

- 3.1 QAP 210 Inspection
- 3.2 QAP 220 Work Orders
- 3.3 QAP 221 Problem Disposition Reports

4. PROCEDURE

- 4.1 Non-conforming items will be identified and processed in accordance with the following procedures, as applicable:

- QAP 210 Inspection
- QAP 220 Work Orders
- QAP 221 Problem Disposition Reports

- 4.2 Non-conforming items will be separated from normal production items unless prohibited by size, weight or other considerations, in which case suitable identification will be attached to prevent inadvertent use.
- 4.3 Customer rejections of items found to be in nonconformance during surveillance inspections shall be documented on Problem Disposition Report Form F249 per QAP 221 and dispositioned in accordance with procedures as indicated in the referenced QAP.
- 4.4 The Problem Disposition Reports generated during the surveillance inspections for a particular customer will be jointly reviewed by ABB EM Contracts, ABB EM Engineering and ABB EM Quality Assurance, as a minimum, on receipt of the order from that customer. The intent of that review is to insure that the specific requirements of their order will be met.