



GENERAL NUCLEAR SYSTEMS, INC.

A CHEM-NUCLEAR COMPANY

135 Darling Drive • Avon, Connecticut 06001 • 203/677-0457

February 11, 1986

Docket No. 99901025
C8602-2

United States Nuclear Regulatory Commission (NRC)
Division of Quality Assurance
Vendor and Technical Training Center Programs
Office of Inspection and Enforcement
Washington, D.C. 20555

Attn: Mr. Gary G. Zech
Chief, Vendor Program Branch

Subject: NRC Inspection of Gesellschaft für Nuklear-Service, mbH
(GNS) facility at Essen, Federal Republic of Germany on
September 16-20 and 23-27, 1985

References: 1) NRC letter dated January 14, 1986 to General Nuclear
Systems, Inc. (GNSI)
2) NRC Inspection Report No. 99901025/85-01 and Notice
of Nonconformance

Gentlemen:

In response to the referenced letter, enclosed is a letter from GNS describing the steps that have been or will be taken to correct the non-conformances you reported and their corrective actions in order to prevent recurrence.

We hope that the actions taken by GNS are satisfactory and meets the NRC requirements.

If you have any questions or need more information, please do not hesitate to contact us.

Very truly yours,

GENERAL NUCLEAR SYSTEMS, INC.

Albert B. Bonifacio

Albert B. Bonifacio
Project Manager

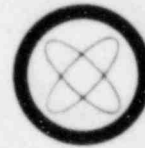
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Enclosure

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PDR GA999 EMVCNSI
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cc: w/enclosures:

GNS-H. Baatz, K. Janberg, R. Bittner
V. Barnhart, P. Highberger, R. Anderson, K. Kingsley

IE:09
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Gesellschaft für Nuklear-Service mbH

GNS Gesellschaft für Nuklear-Service mbH - Goethestr. 88 - 4300 Essen 1

General Nuclear Systems, Inc.
135 Darling Drive

Avon, CT 06001

Attn: Mr. Albert B. Bonifacio

Ihre Nachricht vom / Zeichen

Unsere Zeichen

Durchzahl

Tag

Bi/Mou

7220-160

Feb. 10, 1986

Subject: United States Nuclear Regulatory Commission (NRC)
Inspection of Gesellschaft für Nuklear-Service (GNS)
facility at Essen, Federal Republic of Germany on
September 16-20 and 23-27, 1985

References: 1) NRC letter dated January 14, 1986 to General Nuclear
Systems, Inc. (GNSI)
2) NRC Inspection Report No. 99901025/85-01 and Notice
of Non-conformance

Gentlemen:

This letter is in response to the referenced letter and report regarding the subject inspection. The following are the detailed steps and corrective actions performed and planned by GNS in order to resolve the nonconformances reported by the NRC.

A GNS management meeting was held last Monday, February 3, 1986 to discuss the referenced documents and to assess the adequacy and effectiveness of the GNS Quality Assurance (QA) Program. It was concluded in the meeting that GNS must take appropriate actions immediately to correct and prevent recurrence of the nonconformances reported.

Nonconformance 85-01-01 (Procurement Document Control)

Purchase Orders to Subcontractors did not specify that manufacturing activity should be conducted under an approved QA program and did not specify the requirements of 10 CFR Part 21 apply.

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HRB Essen 2817

Vorsitzender des Beirates: Dr. Helmut Volcker

Geschäftsführer: Dr. Henning Baatz, Dr. Klaus Janberg, Erich v. Wedelstädt

Sitz der Gesellschaft
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Deutsche Bank AG Essen IBZ 360700501 Kto-Nr. 4970133

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Response: All responsible GNS personnel (Engineering Operations, Quality Assurance and Purchasing) involved in procurement document control were re-indoctrinated to the requirements of the GNS QA Program/Contract and instructed to specify QA Program requirements and 10 CFR Part 21 if applicable on all procurement documents.

Indoctrination and instruction were performed last February 5, 1986.

The Notice for 10 CFR Part 21, written in both English and German, describing the regulation and identifying the GNS QA Manager as the individual to whom reports may be made, will also be issued this week to Von-Roll which nickel-plates the cask body and Pennekamp Huesker which supplies the moderator material for subsequent posting in their facility.

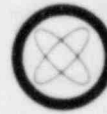
Nonconformance 85-01-02 (Audit)

Audit of three (3) Subcontractors (Butting Metallwerk, Kraftwerk Union and Siempelkamp) were overdue. Checklists were not used in any of the audit reports and Qualifications of auditing personnel were not documented and retained as QA Records.

Response: GNS performed the required audit of Kraftwerk Union and Siempelkamp last September 1985 and Butting Metallwerk last December 1985 using procedure QSP (Quality Assurance Program Requirements for Subcontractors).

GNS is in the process of preparing new Procedures for Audit of Quality Assurance Programs and Qualification and Certification of Audit Personnel. These procedures shall meet the requirements of ANSI N45.2.12 and

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N45.2.23 respectively. The target date for the completion and implementation of these procedures is March 31, 1986.

All Audits of Subcontractors Quality Assurance Programs to be performed by GNS during this year and in the future years will be in accordance with new established procedures as follows:

- Procedure for Audit of Quality Assurance Programs
- Procedure for Qualification and Certification Quality Assurance Auditors.

Nonconformance 85-01-03 (Instructions, Procedures and Drawings)

GNS Procedures PV 91 Hydrostatic Test and PV 32-1 Helium Leak Test does not include requirements for the sequence of tightening bolts, the tightening torque and subsequent documentation on a test report.

Response: GNS is in the process of revising procedures PV 91 and PV 32-1 to incorporate the missing requirements. The revision may be in the form of a Procedure Addenda. Our target date for the completion and implementation of the revision is March 31, 1986 or prior to the next usage of the procedures, whichever is earlier.

GNS has reviewed other procedures to verify and assure that similar requirements are incorporated. The tightening torque required for the bolts was specified in the Assembly Drawing; however it will also be incorporated in the revised procedures.

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Nonconformance 85-01-04 (Control of Special Process)

Response: Currently GNS is using and implementing the acceptable practise for various disciplines of NDT recommended by DGZfP.

However, GNS is in the process of preparing a written practise or procedures for the various discipline of NDT in accordance with the requirement of ASNT recommended practise SNT-TC-1A, June 1980 Edition.

The target date for the completion and implementation of the written practise or procedure is March 31, 1986.

GNS QA Department is now in the process of organizing all NDE Personnel Qualification Records and Certifications to meet SNT-TC-1A format.

GNS Management has designated Mr. Reinhard Bittner, QA Manager, as the Corporate NDE Level III.

Nonconformance 85-01-05 (Control of Measuring and Test Equipment)

Pressure gages used for Helium Leak Test and Hydrostatic Test were not calibrated properly.

Response: Pressure Gages No. 6 and No. 31 which were used were calibrated after the test and found acceptable. We have also officially notified Kraftwerk Union of the deficiency in their control of measuring and test equipment.

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GNS QA personnel were instructed to pay special attention on the status of in-house and subcontractor's measuring and testing equipment prior to use. They were also instructed to review and study all Test Procedures prior to implementation.

GNS will perform a special in-depth QA Audit of Kraftwerk Union control of measuring and test equipment. The audit is scheduled to be performed during the first week of April, 1986.

Please forward our response to the NRC.

NRC is welcome to visit GNS for a follow-up audit after completion and implementation dates we have committed.

Should you have any problems or questions, please contact the undersigned.

Very truly yours,

G N S Gesellschaft für Nuklear-Service mbH

Reinhard Bittner
Quality Assurance Manager

cc: HH. Dr. Janberg
Dr. Baatz