



Nuclear Fuel & Components Manufacturing
General Electric Company
P.O. Box 780, Wilmington, NC 28402
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March 10, 1988

Mr. James C. Stone, Acting Chief
Vendor Inspection Branch
Division of Reactor Inspection & Safeguards
Office of Nuclear Reactor Regulation
Washington, D. C. 20555

Dear Sir:

This letter is GE's response to findings resulting from the audit conducted at our facility by Messrs. R. L. Cilimberg and B. J. Mincher on December 7-11, 1987 as follows:

B-1 Nonconformance

Contrary to Criterion V of Appendix B to 10 CFR 50 and Section 1 of Changeroom PROD No. 86.06, "General Lab Controlled Area Rules," Revision 0, dated January 20, 1987, a GE non-laboratory employee was chewing gum in the Chemet Laboratory. (87-01-01)

GE Response

1. As stated by the Inspection Report, the individual acknowledged that his action deviated from PROD 86.06 which prohibits chewing of gum in the Chemet Lab controlled area, and immediately discontinued chewing when it was brought to his attention. The observed individual does not perform analytical work in the Chemet Lab and, in fact, only infrequently enters the Chemet Lab as a part of his routine activities.
2. In order to prevent recurrence, management took the following actions:

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Mr. James C. Stone
March 10, 1988
Page 2

GE Response - CONT'D.

- A. Directed the individual to follow all Nuclear Safety requirements, including not chewing gum when in a controlled area.
 - B. Issued disciplinary action, as required by established GE procedures, for failure to comply with Nuclear Safety requirements.
3. Item A was completed the same day as the incident and again as part of Item B on 12/15/87 when it was formally documented per GE's disciplinary action program.

B-2 Nonconformance

Contrary to Criterion V of Appendix B to 10 CFR 50 and Section 4.C of the Foreword to Chemical Metallurgical & Spectrochemical (CM&S) Manual, Revision 7, dated June 18, 1986, a pen and ink change was made to Analytical Test Method (ATM) 1.2.8.3, "Determination of Hydrogen in Zirconium, Its Alloys, UO₂ Sintered Pellets and UO₂ - Gd₂O₃ by Inert Gas Fusion," Revision 7, dated September 19, 1986, without initiating a formal revision to ATM 1.2.8.3, Revision 7.

GE Response

1. Laboratory procedure CM&S 1.2.8.3, Revision 8, has been issued incorporating the noted change.
2. To prevent recurrence, the Laboratory employee responsible for the hand-written change was instructed by management to issue a formal revision when any change to a procedure is generated. In addition, Laboratory personnel reviewed all other procedures for similar unauthorized changes.
3. Items 1 and 2 were completed January 22, 1988.

B-3 Nonconformance

Contrary to Criterion V of Appendix B to 10 CFR 50, ATM 1.2.8.3, Revision 7 did not document the steps being used by the Technician to clean the LECO Impulse Furnace (LIF). (87-01-03)

Mr. James C. Stone
March 10, 1988
Page 3

GE Response

1. Laboratory procedure CM&S 1.2.8.3, Revision 8, has been issued incorporating the suggestion to include the acceptable Laboratory practice of cleaning the furnace after each sample and referring to the instruction manual as appropriate. As stated by the Inspection Report, the Technician knew his analytical responsibility and completed all tests in an acceptable manner. Also, there was no detrimental effect to the test results as a function of the way the Technician performed his work. And it should be noted that CMS 1.2.8.3, Revision 7, Section 15-1, referenced the LECO Impluse Furnace Operation manual. Section 7-1, Maintenance Item 1, of that manual states the proper cleaning procedure which the Laboratory Technician was following.
2. All CM&S procedures associated with product analysis are being reviewed to assure that the documented instructions are consistent with the Technician's activities.
3. Item 1 was completed January 22, 1988; Item 2 will be completed 8/1/88.

B-4 Nonconformance

Contrary to Criterion V of Appendix B to 10 CFR 50, ATM 1.2.8.3, Revision 7 did not document the Technician physically bumping the LIF to evenly distribute the flux material. (87-01-04)

GE Response

1. Laboratory procedure CM&S 1.2.8.3, Revision 8, has been issued incorporating the suggestion to include the acceptable Laboratory practice of gently tapping the furnace chamber during standard and/or zirconium analysis to bring the sample and flux into contact. As stated by the Inspection Report, the Technician knew his analytical responsibility and completed all tests in an acceptable manner. Also, there was no detrimental effect to the test results as a function of the way the Technician performed his work.

Mr. James C. Stone
March 10, 1988
Page 4

GE Response - CONT'D.

2. All CM&S procedures associated with product analysis are being reviewed to assure that the documented instructions are consistent with the Technician's activities.
3. Item 1 was completed January 22, 1988; Item 2 will be completed 8/1/88.

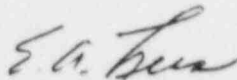
B-5 Nonconformance

Contrary to Criterion V of Appendix B to 10 CFR 50, ATM 1.2.8.3, Revision 7 did not provide guidance for the action taken by a Technician when a pellet does not drop into the crucible in the LIF. (87-01-05)

GE Response

1. Laboratory procedure CM&S 1.2.8.3, Revision 8, has been issued incorporating the suggestion to include what action to take when a pellet does not drop into the crucible in the LIF. As stated by the Inspection Report, the Technician knew his analytical responsibility and completed all tests in an acceptable manner. Also, there was no detrimental effect to the test results as a function of the way the Technician performed his work.
2. All CM&S procedures associated with product analysis are being reviewed to assure that the documented instructions are consistent with the Technician's activities.
3. Item 1 was completed January 22, 1988; Item 2 will be completed 8/1/88.

Sincerely,



E. A. Lees
Nuclear Fuel & Components Manufacturing

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