




QA: QA

Jerry A. Cogar, Manager
Materials & Fabrication Technology
Bechtel SAIC Company, LLC
1180 Town Center Drive
Las Vegas, NV 89144

VERIFICATION OF CORRECTIVE ACTION AND CLOSURE OF DEFICIENCY REPORT
(DR) BSC(V)-02-D-077 RESULTING FROM THE BECHTEL SAIC COMPANY, LLC (BSC)
QUALITY ASSURANCE AUDIT BSC-SA-02-009 OF SENIOR FLEXONICS, INC.
PATHWAY DIVISION (SFIPD)

BSC Quality Assurance has verified implementation of corrective action for DR
BSC(V)-02-D-077 and determined the results to be satisfactory. As a result, the DR has been
closed.

If you have any questions, please contact either at Daniel A. Klimas at (702) 295-2665 or
Robert Hartstern at (702) 295-2675.


Donald T. Krishna, Manager
Quality Assurance

3/26/02
Date Signed

DAK:bw-0325021944

Enclosure:
DR BSC(V)-02-D-077

NMSS07
WM-11

March 26, 2001

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cc w/encl:

L. H. Barrett, DOE/HQ (RW-2) FORS
L. W. Bradshaw, Nye County, Pahrump, NV
Margaret Chu, DOE/HQ (RW-1) FORS
J. R. Dyer, DOE/YMSCO, Las Vegas, NV
W. J. Glasser, NQS, Las Vegas, NV
S. H. Horton, BSC, Las Vegas, NV
D. A. Klimas, BSC, Las Vegas, NV
B. R. Kornegay/B.L. Wilson, BSC, Las Vegas, NV
D. T. Krisha, BSC, Las Vegas, NV
Robert Latta, NRC, Las Vegas, NV
S. W. Lynch, State of Nevada, Carson City, NV
Ram Murthy, DOE/OQA, Las Vegas, NV
D. G. Opielowski, NQS, Las Vegas, NV
J. M. Replogle, DOE/YMSCO, Las Vegas, NV
N. K. Stablein, NRC, Rockville, MD
D. D. von der Linden, BSC, Las Vegas, NV
Engelbrecht von Tiesenhausen, Clark County, Las Vegas, NV

cc w/encl:

R. F. Hartstern, BSC, Las Vegas, NV
O. D. Smith, BSC, Las Vegas, NV
D. J. Tunney, BSC, Las Vegas, NV

OFFICE OF CIVILIAN
RADIOACTIVE WASTE MANAGEMENT
U.S. DEPARTMENT OF ENERGY
WASHINGTON, D.C.

ORIGINAL
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8. ☒ DEFICIENCY REPORT
☐ CORRECTIVE ACTION
REPORT

NO. BSC(V)-02-D-077

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DEFICIENCY/CORRECTIVE ACTION REPORT

1. Controlling Document:

Senior Flexonics, Inc. Nuclear Quality Assurance (QA) Manual, Revision 2

2. Related Report No.:

BSC-SA-02-009

3. Responsible Organization:

BSC Material & Fabrication Technology Dept. /
Senior Flexonics, Inc.

4. Discussed With:

Doug Smith, BSC;
Terry O'Connell, Senior Flexonics, Inc.

5. Requirement:

Senior Flexonics, Inc. Nuclear QA Manual, Revision 2, Section 8, paragraph 8.4, requires the Material Review Board (MRB) to meet and review Nonconformances (NCR) when a Use-As-Is or Repair disposition is requested. Additionally, the MRB is required to provide technical justification for repair dispositions.

6. Description of Condition:

Contrary to the above requirements, the MRB did not convene for review and disposition of Senior Flexonics, Inc.'s NCR's N-01-023 and N-01-028. As a result, there was no technical justification provided for NCR ~~N-01-023~~ with a repair disposition. **N 01-028**

This condition is repetitive. The same condition was identified during BSC Survey BSC-SFE-01-008. Corrective action taken to preclude recurrence was ineffective.

7. Initiator:

D. A. Klimas
Daniel A. Klimas

Date 02/25/2002

9. Does a stop work condition exist? (Not required for a DR)

☐ Yes ☒ No

If Yes, Check One: ☐ A ☐ B ☐ C ☐ D

10. Recommended Actions:

Perform an investigation to determine the extent of the condition.
Determine why previous corrective action to preclude recurrence was ineffective.
Revise the process or procedure to assure the condition does not recur.
Reinstruct or train appropriate individuals to requirements.

11. QA Review:

D. A. Klimas
QAR D. A. KLIMAS

Date 2/26/02

12. Response Due Date:

20 Working Days From Issuance

13. DOQA Issuance Approval:

Printed Name Donald T. Krisha

Signature *D. T. Krisha*

Date 2/28/02

22. Corrective Actions Verified:

QAR: *1*

Date 3/20/02

23. Closure Approved by:

D. T. Krisha
DOQA

Date 3/26/02

TYPE RESPONSE:

- ☐ Initial
- ☒ Complete
- ☐ Amended

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DR/CAR NO. BSC(V)-02-D-077

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DEFICIENCY/CORRECTIVE ACTION REPORT (RESPONSE)

14a. Immediate Actions:

Nonconformance Report (NCR) Nos. N-02-016 and N-02-017 were initiated. These addressed the failure to convene the Material Review Board (MRB) for one NCR with "use-as-is" disposition (N-01-023) and for two (2) NCRs with a "repair" disposition (N-01-022 and N-01-028) without a statement of justification. These NCRs were closed.

Compliance Date: February 21, 2002

14. Remedial Actions:

- 1) The proper MRB actions were conducted for NCR N-02-023 on 2/21/2002.
- 2) The Senior Engineer-Nuclear documented the technical justification for NCRs N-01-022 and N-01-28 and received MRB concurrence the same date.

15. Extent of Condition:

A total of sixty one (61) NCRs were reviewed covering the time period for the next to last ASME Survey (March 1999) to the present. One (1) NCR was found to be have a disposition of "use as is" without convening the MRB. Two NCRs were found to have a disposition of "repair" without a statement of technical justification. The actions taken to correct these are described in Blocks 14a and 14. There is no impact on BSC work.

16. Cause: (Attach results of root cause determination prepared in accordance with AP-16.4Q for a significant deficiency.)

This was caused by a lack of a detailed procedure for the processing of Nonconformance Reports and Corrective Action Reports and a lack of identifiers on the NCR form requiring MRB meetings and technical justification for "use-as-is" or "repair" dispositions.

17. Action to Preclude Recurrence:

The Vice President/General Manager initiated Corrective Action Request No. CAR-N-02 on 2/22/2002 which requires the following actions:

1. Revise the NCR report form to force MRB review and technical justification for "use as is" and "repair" dispositions.
2. Prepare and implement a procedure for nonconformances
3. Prepare and implement a procedure for corrective action.
4. Conduct training on the revised NCR form and NCR/CAR procedures.

18. Due Date: March 18, 2002

- ☐ For submittal of complete response
- ☒ For completion of corrective action

19. Response by: Jack Cloud

Responsible Individual: Doug Smith

Cal W Chagnon for

Date 3-13-02

Phone 295-4383

20. Evaluation: ☒ Accept ☐ Partially Accept ☐ Reject

21. Concurrence:

Robert P. Kish for

DOQA

D. E. KRISHA

Date 3/26/02

QAR Daniel Hymas Date 3/18/02

Exhibit AP-16.1Q.1

Rev. 12/20/1999

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8. ☒ DR/CAR
☐ Stop Work Order

BSC(V)-02-D-077
NO.

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QA: QA

DEFICIENCY/CORRECTIVE ACTION REPORT/STOP WORK ORDER CONTINUATION PAGE

Discussion

This DR was initiated as a result of Supplier Audit BSC-SA-02-009 for failure of the SFIPD Material Review Board to convene to disposition Nonconformance Reports (NCR) with a repair or use-as-is disposition. Additionally, as a result, a technical justification was not provided for the repair disposition as required. This condition was previously identified during a survey of SFIPD BSC-SFE-01-008 on 8/7-8/01.

Corrective Actions verified for closure of DR.

Block 14a Immediate Actions:

Verified that SFIPD initiated NCR N-02-016 on 2/20/02 for failure of the MRB to convene for use-as-is dispositions and NCR N-02-017 on 2/20/02 for failure to provide technical justification for repair dispositions. These NCRs were verified as being closed on 2/21/02.

Block 14 Remedial Actions:

Verified the MRB actions were documented for NCR N-02-023 on 2/21/02.

Verified that technical justification was provided by the MRB for NCRs N-01-022 and N-01-028 with repair dispositions on 2/21/02. NCR N-01-022 was discovered during investigations to determine extent of condition. Verified SFIPD also initiated an internal Corrective Action Request CAR-N-002 to document these conditions. This CAR was closed 3/6/02.

Block 15 Extent of Condition:

Verified that an investigation was conducted on all NCRs initiated from March 1999 to present to determine the extent of the condition and one other NCR was identified without MRB action and technical justification for a repair disposition. NCR N-01-022. This NCR was also revisited by the MRB and technical justification was provided. There was no impact on YMP activities as these NCRs were not related to YMP work.

Block 16 Cause:

Verified and concur that the cause of the condition was a lack of detail in the procedure and lack of identifier on the NCR form that requires MRB actions.

Block 17 Action to Preclude Recurrence:

Verified that a procedure for control of Nonconformances was issued 2/21/02 to further detail the Nonconformance process. Standard Quality Procedure (SQP) 806. The NCR Form was also revised to require MRB action prior to closure.

Verified a SQP 807 was developed and issued 2/20/02 to further detail requirements for corrective actions.

Verified training was conducted on both of these procedure processes on 2/21/02.

Based upon the above verification of corrective actions, this DR is closed.

Daniel Klimas
 Date: 3/20/02

(See Addendum 1)



2400 Longhorn Industrial Drive
New Braunfels, Texas 78130-2530
Phone 830-629-8080, FAX 830-629-7918

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NCR Number: N-02-016Date: 2/20/02Attachments: Yes**NONCONFORMANCE REPORT (NCR)**RECEIVING ☐IN-PLANT ☒Vendor or Customer: SFPSenior Flexonics Job No.: N/APurchase Order No.: N/APacking List No.: N/AQty. Insp.: 61Qty. Deviated: 1MTCN: N/AAppl. Code/Spec.: NQAM, 6th

Edition, Revision 0, Paragraph 8.4.2

Dwg. No.: N/ASketch No.: N/ASerial No.: N/AP/N: N/A**REQUIREMENT(S):**

1. NQAM states "MRB action shall be required in situations described in 8.4.A.1 above or when back charges to a vendor will be necessary."

(Paragraph 8.4.A.1 is the definition for "use-as-is" dispositions.)

DEVIATION(S):

Contrary to the requirement, NCR #N-01-023, was dispositioned as "use-as-is" and was not granted the benefit of an MRB action. A total of 61 NCR's from January 1, 1999 to present were reviewed, and all other such dispositions were found to have MRB actions taken as required, with exceptions identified in NCR N-01-012.

As a note, this deficiency was identified previously, and corrective actions to date have not been sufficient to prevent recurrence. Refer to the recommended actions below to prevent recurrence.

Responsibility: Vendor ☐
Production ☐

Q.C. ☐
Other ☒

Q.C. Inspector: [Signature]Date: 2/20/02**RECOMMENDED CORRECTIVE ACTION:**

1. Conduct the proper MRB actions for the NCR # N-01-023.
2. Develop a new procedure for the processing of nonconformances and corrective actions.
3. Revise the NCR form to force all "use-as-is" dispositions to have MRB action prior to closure.
4. Provide training for all MRB members.

By: [Signature] Date: 2/20/02Job Title: Director of Q.A.**CORRECTIVE ACTION TAKEN**

1. Complete 2/21/02
2. SFP-809 & SFP-807 Rev. 7 Required 2/21/02
3. Complete 2/21/02
4. Complete 2/21/02

By: [Signature] Date: 2/21/02Job Title: QCCIQ.C. Verification: [Signature] Date: 2/21/02

Notification Required: ☐ Customer ☐ Vendor ☒ AI/ANI CSAW 2/21/02 Reportable Under 10CFR21 ☐ Yes ☒ No

MATERIAL REVIEW BOARDYes ☒ No ☐**CAUSE:**Lack of procedural and form guidance.

Initial	Date
D.Q.A.: <u>[Signature]</u>	<u>2/21/02</u>
Prod. Supv.: <u>[Signature]</u>	<u>2/21/02</u>
Dir./Prod.: <u>[Signature]</u>	<u>2/21/02</u>
Q.C.M.: <u>[Signature]</u>	<u>2/21/02</u>
Purch.: <u>[Signature]</u>	<u>2/21/02</u>
Other: <u>[Signature]</u>	<u>2/21/02</u>

ACTION TAKEN TO PRECLUDE OF RECURRENCE:

Development of new procedures for NCR's
Corrective Action revision of NCR form
Training

BY: [Signature] TITLE: DQA DATE: 2/21/02**VERIFICATION OF COMPLETION OF ABOVE ACTIONS**Director of Q.A.: [Signature] Date: 2/21/02AI/ANI: [Signature] Date: 2-21-02**REMARKS**See CAR# CAR-N-002



2400 Longhorn Industrial Drive
New Braunfels, Texas 78130-2530
Phone 830-829-8080, FAX 830-629-7918

Original ☒ Red
red

NCR Number: N-02-017

Date: 2/20/02

Attachments: Yes

NONCONFORMANCE REPORT (NCR)

RECEIVING ☐

IN-PLANT ☒

Vendor or Customer: SFP

Senior Flexonics Job No.: N/A

Purchase Order No.: N/A

Packing List No.: N/A

Qty. Insp.: 61 Qty. Deviated: 2

MTCN: N/A

Appl. Code/Spec.: NOAM, 6th

Edition, Revision 0, Paragraph 8.4.5

Dwg. No.: N/A Sketch No.: N/A

Serial No.: N/A

P/N: N/A

REQUIREMENT(S):

1. NOAM states "The MRB disposition for "repair" or "use as is" dispositions shall include the technical justification."

(NOAM paragraph 8.4.5)

DEVIATION(S):

Contrary to the requirement, NCR's #N-01-022 and N-01-028, were dispositioned as "repair" and did not reflect technical justification statements to support the repair activities. A total of 61 NCR's from January 1, 1999 to present were reviewed, and all other repair dispositions were deemed acceptable.

Responsibility: Vendor ☐
Production ☐

O.C. ☐
Other ☒

O.C. Inspector: [Signature] Date: 2/20/02

RECOMMENDED CORRECTIVE ACTION:

1. Document technical justifications for NCR's # N-01-022 and N-01-028.
2. Develop a new procedure for the processing of nonconformances and corrective actions.
3. Revise the NCR form to force documenting a technical justification for all "repair" dispositions.
4. Provide training for all applicable personnel.

By: [Signature] Date: 2/20/02

Job Title: Director of Q.A.

CORRECTIVE ACTION TAKEN:

N-01-022: Repair of tube and customer equipment to original condition.

2-000241 ASD. "Replacement options for damaged section" (MEANICK, et al) ASME BPP Vol 43, and evaluation of fatigue requirements. None removal is not prohibited.

By: [Signature] Date: 2/21/02

Job Title: SE-N

Items 1-4 completed
Q.C. Verification: [Signature] Date: 2/21/02

Notification Required: ☐ Customer ☐ Vendor ☒ AI/ANI Reportable Under 10CFR21 ☐ Yes ☒ No

MATERIAL REVIEW BOARD

Yes ☒ No ☐

Initial	Date
D.Q.A.: <u>[Signature]</u>	<u>2/21/02</u>
Prod. Supv.: <u>[Signature]</u>	<u>2/21/02</u>
Dir./Prod.: <u>[Signature]</u>	<u>2/21/02</u>
Q.C.M.: <u>[Signature]</u>	<u>2/21/02</u>
Purch.: <u>[Signature]</u>	<u>2/21/02</u>
Other: <u>[Signature]</u>	<u>2/21/02</u>

CAUSE:

Lack of procedural and form guidance.

ACTION TAKEN TO PRECLUDE OF RECURRENCE:

Development of new procedures for NCR's
2 Corrective Action, revision of NCR form
BY: [Signature] TITLE: DOA DATE: 2/21/02

VERIFICATION OF COMPLETION OF ABOVE ACTIONS

Director of Q.A.: [Signature] Date: 2/21/02
AI/ANI: [Signature] Date: 2-21-02

REMARKS

See CAR# CAR-N-002

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senior
Flexonics

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CORRECTIVE ACTION REQUESTORIGINAL
redIssued to: Terry O'Connell, Director of Q.A.CAR #: CAR-N-002Company: Senior Flexonics PathwayDate Issued: February 22, 2002CAR Issued by: Greg Perkins, VP/GMNCR #(s): N-01-012, N-02-016 & -017**Requirement and condition adverse to quality/deficiency:**


SFP NQAM Section 8.0, paragraph 8.4.A.1 states in part "MRB action shall be required in situations described in 8.4.A.1 above (for use as is dispositions) or when back charges to a vendor will be necessary." Additionally, paragraph 8.4.5 states "The MRB disposition for repair or use as is dispositions shall include technical justification." Contrary to these requirements, since March 1999, one NCR dispositioned as use as is did not receive MRB review and two NCR's dispositioned as repair did not include a technical justification. The MRB issue is a recurring nonconformance, which was previously identified during the Bechtel SAIC August 2001 audit and once again in Feb. 2002.

Root cause of the deficiency:

- 1.) Lack of nonconformance report disposition review and technical justification identifiers.
- 2.) Lack of procedural guidance for the processing of nonconformances.
- 3.) Lack of procedural guidance for the processing of corrective action requests.

Measures that have been or will be taken to correct the deficiency and prevent recurrence:

- 1.) Revise the nonconformance report form to force MRB review and technical justification for use as is and repair dispositions.
- 2.) Prepare and implement a procedure for nonconformances.
- 3.) Prepare and implement a procedure for corrective action.
- 4.) Conduct training on the revised NCR form and NCR/CAR procedures.

Person responsible for the above stated actions (print): Terry O'Connell, DQA**Date(s) all the above corrective and preventative actions will be completed:** 3/21/02**Responsible person's signature:**  **Date:** 2/22/02**Review of Committed Corrective Action:**☒ Approved☐ Not approved (reason): _____**Director of QA or VP/GM:**  **Date:** 2/22/02**Corrective Action has been reviewed and found to be:**☒ Satisfactory, CAR is considered closed☐ Unsatisfactory (reason): _____**Director of QA or VP/GM:**  **Date:** 3/6/02

Revision No. 0		Procedure No. SQP-807
Date: February 20, 2002		Page 1 of 4
2400 Longhorn Industrial Drive * New Braunfels, TX 78130 * (830) 629-8080		
STANDARD QUALITY PROCEDURE FOR CORRECTIVE ACTION		

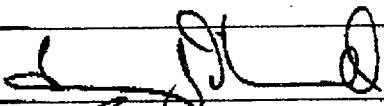

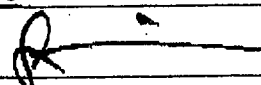
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Standard Quality Procedure

Scope of Revision: N/A - Initial Issue

Exhibits: Exhibit A: Corrective Action Request

Approval Signatures Revision 0

Director of Quality Assurance	Terry O'Connell		Date: 2/20/02
Senior Engineer-Nuclear	Larry Verner		Date: 2/21/02
Vice President & General Manager	Greg Perkins		Date: 2/21/02

CAR-N-002, Action Item #3

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Revision No. 0	senior Flexonics	Procedure No. SQP-806
Date: February 20, 2002		Page 1 of 11
2400 Longhorn Industrial Drive * New Braunfels, TX 78130 * (830) 629-8080		
STANDARD QUALITY PROCEDURE FOR IDENTIFICATION AND CONTROL OF NONCONFORMANCES		



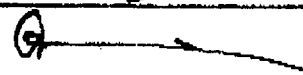
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Standard Quality Procedure

Scope of Revision: N/A - Initial Issue

Exhibits: Exhibit A: Hold Tag
Exhibit B: Hold for QC Clearance Sticker
Exhibit C: Nonconformance Report
Exhibit D: Hold Tag Log
Exhibit E: NCR Log

Approval Signatures Revision 0

Director of Quality Assurance	Terry O'Connell		Date: 2/20/02
Senior Engineer-Nuclear	Larry Verner		Date: 2/29/02
Vice President & General Manager	Greg Perkins		Date: 2/21/02

CAR-N-002, Action Item # 2

NCR Tag application by (name/date): _____
SFP Sales Order/ Job number: _____, Purchase Order: _____, Revision level: _____
Applicable Code/Specification: _____, Item number(s): _____
Quantity inspected: _____, Quantity of deviations: _____, MTCN(s): _____
Drawing identification: _____, Revision level: _____, Part number(s): _____
Sketch identification: _____, Revision level: _____
Serial number(s): _____

Description of Nonconformance(s): _____

Requirements: Applicable Manual, Procedure, Specifications, etc.. reference: _____

Responsible department or organization: _____, Department: _____
NCR Initiator/date: _____

Recommended Disposition: _____

By/title/date: _____
☐ "Use as-is" ☐ Repair/rework (quantity _____) ☐ Scrap (quantity _____) ☐ Other _____
☐ Return to Vendor

◆ = Requires mandatory MRB review for resolution and technical justification

DQA/date: _____, QCM/date: _____, SE-N/date: _____, PE/date: _____

DPP/date: _____, PM/date: _____, Other/date: _____

Reportable under 10CFR21 ☐ Yes ☐ No

Customer notification/date: _____, By/date: _____
ANI/AI notification date: _____, By/date: _____, ANI/ANI Initial/date: _____

Corrective Action Taken: _____

By/title/date: _____, Verification of completion QC/title/date: _____

Cause: _____

Action taken to preclude recurrence: _____

By/title/date: _____

Corrective Action Review

☐ Required ☐ Not Required Reference Documents (ie CAR etc.) : _____

DQA/date: _____

Comments: _____

Verification of completion of above actions
DQA/date: _____

ANI/AI/date: _____

CAR - N-002, Action Item # 1

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