

December 7, 2017

Steven Huntington, Senior Vice President
System One Holdings, LLC
1200 Watercrest Way, Suite 1210
Cheswick, PA 15024

SUBJECT: U.S. NUCLEAR REGULATORY COMMISSION INSPECTION OF SYSTEM ONE
HOLDINGS, LLC, REPORT NO. 99902053/2017-201

Dear Mr. Steven Huntington:

On November 13-16, 2017, the U.S. Nuclear Regulatory Commission (NRC) staff conducted an inspection of System One Holdings, LLC (System One) at the facility in Cheswick, PA. The purpose of this limited scope inspection was to assess System One's implementation of applicable requirements of Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, "Domestic Licensing of Production and Utilization Facilities," and 10 CFR Part 21, "Reporting of Defects and Noncompliance."

The inspection assessed aspects of System One's quality assurance activities, which included the corrective action and audit programs associated with the training and qualification for nuclear power plant licensees regarding activities associated with conducting inspection and nondestructive examination of safety-related structures, systems, and components (SSCs). The enclosed report presents the results of this inspection. This NRC inspection report does not constitute an NRC endorsement of System One's quality assurance and 10 CFR Part 21 programs.

Within the scope of this inspection, no violations were identified.

In accordance with 10 CFR 2.390, "Agency Rules of Practice and Procedure," a copy of this letter and its enclosure(s) will be made publically available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible at <http://www.nrc.gov/reading-rm/adams.html>.

Sincerely,

Kerri Kavanagh, Chief **/RA/**
Quality Assurance Vendor Inspection Branch-3
Division of Construction Inspection
and Operational Programs
Office of New Reactors

Docket No.: 99902053

Enclosure:
Inspection Report No. 99902053/2017-201
and Attachment

SUBJECT: U.S. NUCLEAR REGULATORY COMMISSION INSPECTION OF SYSTEM ONE HOLDINGS, LLC, REPORT NO. 99902053/2017-201, DATED December 6, 2017

Docket No.: 99902053

Enclosure:
Inspection Report No. 99902053/2017-201
and Attachment

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**U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF NEW REACTORS
DIVISION OF CONSTRUCTION INSPECTION AND
OPERATIONAL PROGRAMS**

Docket No.: 99902053

Report No.: 99902053/2017-201

Vendor: System One Holdings, LLC
1200 Watercrest Way, Suite 1210
Cheswick, PA 15024

Vendor Contact: Steven Huntington
Senior Vice President
Phone: (724) 490-8910
E-Mail: Steve.Huntington@systemone.com

Nuclear Industry Activity : System One Holdings, LLC (System One), provides training and qualification for nuclear power plant licensees regarding activities associated with conducting inspection and nondestructive examination of SSCs.

Inspection Dates: November 13 – 16, 2017

Inspection Team: Paul Prescott NRO/DCIP/QVIB3 Team Leader
Taylor Lamb NRO/DCIP/QVIB3 Team Leader in
Training
Ashley Ferguson NRO/DCIP/QVIB3

Approved by: Kerri Kavanagh, Chief
Quality Assurance Vendor Inspection Branch-3
Division of Construction Inspection
and Operational Programs
Office of New Reactors

EXECUTIVE SUMMARY

System One Holdings, LLC
99902053/2017-201

The U.S. Nuclear Regulatory Commission (NRC) conducted this quality assurance (QA) inspection to verify that, System One Holdings, LLC (System One), implemented an adequate QA program in compliance with the applicable requirements of Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, "Domestic Licensing of Production and Utilization Facilities," and 10 CFR Part 21, "Reporting Defects and Noncompliance." The inspection team conducted the inspection at the System One facility in Cheswick, PA.

The inspection evaluated System One's implementation of quality activities associated with personnel training and qualification activities for conducting inspection and nondestructive examination of safety-related structures, systems, and components for nuclear power plant licensees. The inspection focus was to ensure the implementation of quality activities are being effectively implemented and meet the applicable requirements of Appendix B to 10 CFR Part 50, 10 CFR Part 21, and other codes and standards if applicable (i.e., American Society of Mechanical Engineers (ASME) Section III, ASME QME-1-2007).

During the planning and course of this inspection, the NRC inspection team followed Inspection Procedure (IP) 36100, "Inspection of 10 CFR Part 21 and 50.55(e) Programs for Reporting Defects and Noncompliance," and IP 43002, "Routine Inspection of Nuclear Vendors."

This was the first NRC inspection of System One. The NRC inspection team concluded that System One's QA policies and procedures comply with the applicable requirements of Appendix B to 10 CFR Part 50 and 10 CFR Part 21, and that System One's personnel are implementing these policies and procedures effectively. The results of this inspection are summarized below.

System One Overview

In July 2015, System One acquired URS/AECOM Quality Programs Group. As a result, System One was operating under two separate QA programs and QA manuals. Both manuals were structured, audited, and approved by System One to be in compliance with the requirements of 10 CFR Part 50, Appendix B, and ASME NQA-1, "Quality Assurance Requirements for Nuclear Facility Applications." In March 2016, System One implemented one QA manual to be used by all System One locations. The scope of this inspection focused on the current System One QA program implementation.

Inspection Areas

The NRC inspection team determined that System One is implementing its programs for organization, quality assurance, contracted activities, instructions and procedures, document control, inspection, corrective action, quality assurance records, and internal audits in accordance with the applicable requirements of Appendix B to 10 CFR Part 50. Also, System One is implementing its 10 CFR Part 21 program in accordance with the regulatory requirements. Based on the limited sample of documents reviewed, the NRC inspection team also determined that System One is acceptably implementing its policies and procedures associated with these programs. No findings of significance were identified.

REPORT DETAILS

1. 10 CFR Part 21 Program

a. Scope

The NRC inspection team reviewed System One QA manuals, policies, and procedures that govern the evaluation program to determine compliance with Title 10 of the *Code of Federal Regulations* (10 CFR) Part 21, "Reporting Defects and Noncompliance." The NRC inspection team verified that System One's nonconformance and corrective action processes provide adequate links to the Part 21 procedure. The NRC inspection team reviewed System One's procedures and corrective action program to verify an adequate identification of conditions that could require 10 CFR Part 21 evaluation, and to ensure the transfer of the responsibility for evaluation to System One.

The NRC inspection team discussed the Part 21 process with System One personnel to assess their understanding of Part 21, and how they would identify conditions that could require 10 CFR Part 21 evaluation.

The NRC inspection team reviewed System One's evaluation for Part 21 notification 2016-58-01, "Willful Misconduct and Falsification of Records." System One's immediate and subsequent actions to address the issue were also evaluated.

The documents reviewed by the NRC inspection team are included in the attachment to this inspection report.

b. Findings and Observations

No findings of significance were identified.

c. Conclusion

The NRC inspection team determined that for the sample evaluated, System One's program implemented to meet the requirements of 10 CFR Part 21 is consistent with the regulatory requirements. No findings of significance were identified.

2. Organization

a. Scope

The NRC inspection team reviewed System One's quality assurance policies, procedures, and qualification records to verify compliance with Criterion I, "Organization," of Appendix B, "Quality Assurance Program Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities." Additionally, the NRC inspection team verified compliance with the requirements and standards of the American Society of Mechanical Engineers (ASME) NQA-1-2008, "Quality Assurance Requirements for Nuclear Facility Applications," and of American Society for Nondestructive Testing (ASNT) CP-189-1995, "ASNT Standard for Qualification and Certification of Nondestructive Testing Personnel," 1995 Edition.

The NRC inspection team reviewed the organizational structure and functional relationships of System One, and identified the individuals responsible for defining the overall effectiveness of the QA program. Additionally, the NRC inspection team reviewed a sample of documents to verify that the personnel and organizations performing QA program implementation and verification activities have the authority, independence, and organizational freedom (independent from cost or schedule considerations) to identify quality problems, recommend solutions, and verify implementation of solutions.

The documents reviewed by the NRC inspection team are included in the attachment to this inspection report.

b. Findings and Observations

No findings of significance were identified.

c. Conclusion

The NRC inspection team determined that for the sample evaluated, System One's program implemented to meet the requirements of Criterion I of Appendix B to 10 CFR Part 50 is consistent with the regulatory requirements. No findings of significance were identified.

3. Quality Assurance Program and Quality Assurance Records

a. Scope

The NRC inspection team reviewed System One's quality assurance policies, procedures, and training and qualification records to verify compliance with the requirements of Criterion II, "Quality Assurance Program" and Criterion XVII, "Quality Assurance Records," of Appendix B to 10 CFR Part 50.

The NRC inspection team verified that the System One QA program identifies the items and activities to which it applies. Management of those organizations implementing the QA program, or portions thereof, assess the adequacy of that part of the program for which they are responsible and assure its effective implementation in accordance with established procedures. Programs are implemented for the indoctrination and training of personnel performing activities affecting quality. Qualification records and certifications exist for inspection/test personnel and auditors performing activities affecting quality. Qualification records of personnel are certified in accordance with industry and vendor program requirements.

The NRC inspection team verified that the vendor implements a documented record system that provides measures for identification of records to be maintained; classification of records; validation of records; control of distribution; handling, maintenance, and storage; and procedures implementing configuration management requirements.

The records sampled were legible, adequate, retrievable, and adequately protected. The records are stored in a manner that precludes deterioration, environmental effects, damage, and loss.

The documents reviewed by the NRC inspection team are included in the attachment to this inspection report.

b. Findings and Observations

No findings of significance were identified.

c. Conclusion

The NRC inspection team determined that for the sample evaluated, System One's program implemented to meet the requirements of Criterion II of Appendix B to 10 CFR Part 50 is consistent with the regulatory requirements. No findings of significance were identified.

4. Oversight of Contracted Activities and Internal Audits

a. Scope

The NRC inspection team reviewed System One's policies and implementing procedures that govern its procurement document control, supplier oversight, and internal audits programs to verify compliance with the requirements of Criterion IV, "Procurement Document Control," Criterion VII, "Control of Purchased Material, Equipment, and Services," and Criterion XVIII, "Audits," of Appendix B to 10 CFR Part 50.

The NRC inspection team reviewed System One's process of selecting and approving suppliers and service providers for safety-related components. Additionally, the NRC inspection team reviewed System One's Approved Vendor List (AVL) to ensure that qualified and approved suppliers were listed; that authorized personnel maintained, distributed, and periodically updated the list; and that any revisions to the AVL were implemented in accordance with the applicable procedures. Lastly, the NRC inspection team verified that the AVL documented (1) the vendor name, (2) the scope of work, (3) the approval date, and (4) the due date.

The NRC inspection team selected a sample of suppliers to review System One's methodology of conducting and documenting audits. The NRC inspection team verified that the audits were performed by qualified lead auditors and auditors and that the audit reports contained objective evidence of the review of the relevant quality assurance (QA) criteria of Appendix B to 10 CFR Part 50.

At the time of the inspection, System One had made only one safety-related procurement in the last several years. The NRC inspection team reviewed the one purchase order (PO), which was for ultrasonic test equipment, to verify that the PO included, as appropriate: the scope of work, right of access to facilities, and provisions of 10 CFR Part 21. The NRC inspection team reviewed the receipt inspection for the ultrasonic test equipment to verify that the inspection was performed by qualified personnel and followed approved policies and procedures.

The NRC inspection team reviewed a sample of internal audits and the qualifications of System One auditors to verify the implementation of the System One audit

program. The NRC inspection team verified that System One had prepared and approved plans that identify the audit scope and applicable checklist criteria before the initiation of the audit activity. The NRC inspection team verified that the internal audits contained adequate documented objective evidence of compliance with the applicable requirements. In addition, the NRC inspection team verified that internal audits were performed by personnel not having direct responsibilities in the areas being audited. For audits that resulted in findings, the NRC inspection team verified that audit findings were dispositioned, corrective actions were implemented to the correct issues identified, and were evaluated for Part 21 applicability as appropriate.

The NRC inspection team also discussed the procurement document control, supplier oversight, and internal audits programs with System One management and technical staff. The documents reviewed by the NRC inspection team are included in the attachment to this inspection report.

b. Findings and Observations

No findings of significance were identified.

c. Conclusion

The NRC inspection team determined that for the sample evaluated, System One's programs implemented to meet the requirements of Criterion IV, Criterion VII, and Criterion XVIII of Appendix B to 10 CFR Part 50 are consistent with the regulatory requirements. No findings of significance were identified.

5. Instructions and Procedures

a. Scope

The NRC inspection team reviewed System One's quality assurance policies and procedures to verify compliance with the requirements of Criterion V, "Instructions, Procedures, and Drawings," of Appendix B to 10 CFR Part 50.

The NRC inspection team verified that work and inspection procedures have been established, implemented, and followed. Instructions, procedures, and drawings are reviewed, approved, and controlled. Individuals performing activities related to quality have the most recently approved specifications, procedures and instructions available to them, pertinent to the activity being performed. Qualitative and quantitative acceptance criteria for determining that activities have been satisfactorily accomplished has been established.

b. Findings and Observations

No findings of significance were identified.

c. Conclusion

The NRC inspection team determined that for the sample evaluated, System One's program implemented to meet the requirements of Criterion V of Appendix B to 10 CFR Part 50 is consistent with the regulatory requirements. No findings of significance were identified.

6. Nonconforming Materials, Parts and Corrective Action

a. Scope

The NRC inspection team reviewed System One's policies and implementing procedures that govern the evaluation of nonconformances and the implementation of corrective actions to verify compliance with the requirements of Criterion XV, "Nonconforming Material, Parts and Components," and Criterion XVI, "Corrective Action," of Appendix B to 10 CFR Part 50. The NRC inspection team reviewed samples of documented nonconformances and their corrective actions to ensure that the dispositions and specified corrective actions were appropriate. In addition, the NRC inspection team verified that both programs provided a connection to 10 CFR Part 21.

For nuclear-related work, the responsible manager reviews and screens for possible reporting under 10 CFR Part 21. The NRC inspection team verified that review and approval of the disposition is in accordance with procedures governing the activities of the person or organization preparing the disposition. In addition, the NRC inspection team observed that, for corrective action, the procedure provides instructions and guidelines to quality personnel in identifying and documenting conditions adverse to quality, determining significance, cause determination and for reviewing dispositions to corrective action requests. The NRC inspection team reviewed all documents associated with 2016-58-01 Part 21 report.

The documents reviewed by the NRC inspection team are included in the attachment to this inspection report.

b. Findings and Observations

No findings of significance were identified.

c. Conclusion

The NRC inspection team determined for the sample evaluated, System One's programs implemented to satisfy the requirements of Criterion XV and Criterion XVI of Appendix B to 10 CFR Part 50 are consistent with the regulatory requirements. No findings of significance were identified.

10. Entrance and Exit Meetings

On November 13, 2017, the NRC inspection team discussed the scope of the inspection during an entrance meeting with Steve Huntington and other System One personnel. On November 16, 2017, the NRC inspection team presented the inspection results during an exit meeting with Steve Huntington and other System One personnel.

ATTACHMENT

1. ENTRANCE/EXIT MEETING ATTENDEES

Name	Title	Affiliation	Entrance	Exit	Interviewed
Taylor Lamb	Inspector Team Leader In Training	NRC	X	X	
Paul Prescott	Inspector	NRC	X	X	
Ashley Ferguson	Inspector	NRC	X	X	
Steven Huntington	Senior Vice President Quality Solutions	System One	X	X	X
James Tischuk	Manager Quality Assurance	System One	X	X	X
Jeff Sengenberger	Vice President Quality Programs, Quality Solutions	System One	X		
Paul Helton	Director Quality Assurance	System One	X	X	X
Suzanne Bialis	System One Technical Training Center Associate Director	System One	X	X	X
Louis Hass	NDT Level III	System One	X	X	

2. INSPECTION PROCEDURES USED

Inspection Procedure 36100, "Inspection of 10 CFR Part 21 and 50.55(e) Programs for Reporting Defects and Noncompliance," dated February 13, 2012

Inspection Procedure 43002, "Routine Inspections of Nuclear Vendors," dated January 27, 2017

3. LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

None.

4. DOCUMENTS REVIEWED

Audits

- Audit No. QS-TRNG-117, "System One Quality Solutions Quality Assurance Program and Quality Assurance Procedures," dated January 31, 2017
- Audit No. QS-NDE-CERT-117, "System One Quality Solutions NDE Personnel Certification Program," dated August 23, 2017
- Audit Report No. QS-PROC-117, "System One Quality Solutions Procurement," dated April 28, 2017
- Audit Report No QS-PROG-QA-117, "System One Quality Solutions Organization, Vendor Qualification, Control of Nonconforming Conditions, Corrective Action Program, Audit Program, and QA Records," dated March 10, 2017

- Nuclear Industry Assessment Committee (NIAC) Assessment/Audit Evaluation for VT and Principal Level III,” dated August 23, 2017
- NIAC Audit No. 2203, dated July 28, 2017
- Audit No. 15-002 for Eddy Current Level III and Certification Services, dated August 6, 2015
- Audit No. 21074 R1 for NDE personnel, dated February 23, 2016
- NIAC Assessment/Audit Evaluation for NDE personnel, dated April 29, 2016
- Audit conducted for NDE and inspection services, dated February 12, 2017
- Supplier Annual Evaluation for NDE Services (Personnel, Equipment and Level III Services) dated September 1, 2017
- Supplier Annual Evaluation for NDE Services (Personnel, Equipment and Level III Services) dated September 14, 2016
- Supplier annual Evaluation for NDE Services (ASME Section XI) dated November 13, 2015
- Supplier Annual Evaluations for NDE Services (ASME Section XI), dated February 1, 2017

Corrective Action Reports

CAR 2016-001, “Certification of Employee Conducted in 2013 Time Period under System One,” dated October 4, 2016

Nonconformance Reports

NCR 2016-001, “Mechanical Level II Certification Expired on 8/29/15 but Individual Continued to Perform Inspections after that Date”

NCR 2016-002, “Certification of Employee Conducted in 2013 under System One”

NCR 2016-004, “UT Level II Certification of Individual dated October 3, 2015 per QAP 9.5 Revision 8 and Appendix VII, Revision 9”

NCR 2017-001, “Review of NDE Certification Files Performed Relative to CAR 2016-001”

NCR 2017-007, “Review of Certification Files for QC/NDE Personnel Found during Annual Reviews with Missing Documentation”

NCR 050216JBT-3, “Aecom Provided Services to System One including Internal Auditing and NDE Personnel and no PO Initiated”

NCR 062616WLS, “Improper/Incomplete Basis for Qualification could result in Placement of Safety-Related PO to Unqualified Vendor”

NCR 050216JBT-4, “Lack of Procedural Definition/Requirements for the Performance of a Vendor Qualification based upon the Dedication Concept”

Nonconformance Reports Generated During the Inspection

NCR 2017-015, dated November 14, 2017

NCR 2017-016, dated November 15, 2017

NCR 2017-017, dated November 15, 2017

NCR 2017-018, dated November 15, 2017

Audit Finding Report Finding's

External Audit 2017-E05

- Audit Report Finding (ARF) No. 1, "Project Quality Plans are not being Completed for all Client POs"
- ARF No. 2, "Required Quality Records Index is not being Developed and Implemented for Indexing Quality Records"
- ARF No. 3, "NDT Materials are not being Verified and Recorded on the Appropriate Inspection Report"
- ARF No. 4, "Calibration Records did not Contain all Required Information (e.g., Temperature, Humidity, Calibration Dates)"

External Audit 2016-E06

- NCR 050216JBT-1, "Several Issues Identified Related to the Completion of Nonconformances and Corrective Actions"
- NCR 050216JBT-2, "Exams for Section XI UT for an Individual could not be Found by System One and Records not Stored Properly"
- NCR 052516SMB, "QAP 9.1 does not Address the Designation"
- NCR 060916SMB, "Certification Record of Individual does not Contain Written Exam for Level II Mechanical Certification to N45.2.6"
- NCR 060916SMB-1, "Written Exam for Two Individuals did not Contain the Required Number of Questions for VT Level II Certification to SNT-TC-1A"
- NCR 061716SMB, "Written Exam for Individual did not Contain the Required Number of Questions for VT I,2 and 3 Level II Certification to ASME XI"
- NCR 061716SMB-2, "Certification Record for Individual did not Contain the Practical Exam to Support Level III Electrical Certification to N45.2.6"
- NCR 062316SMB, "Certification Record for Individual did not Contain the Exams to Support Level III Certification to N45.2.6"

Contracts

- Purchase Order (PO) No. 2700005474 for manual performance demonstration initiative (PDI) ultrasonic test (UT) Level II ASME Section XI Work, dated February 23, 2017
- PO No. 2700005059 for manual PDI UT Level II ASME Section XI Work, dated September 8, 2016
- PO No. 2700005180 for quality control mechanical and penetrant testing Level II certifications, dated October 10, 2016

Quality and Project Procedures

- Quality Assurance Manual, Revision 9, dated August 1, 2016
- QAP 1.1, "Organization," Revision 0, dated July 19, 2016
- QAP 2.5, "Qualification & Certification of Audit Personnel," Revision 2, dated July 28, 2017
- QAP 2.7, "Visual Acuity Examination," Revision 1, dated August 29, 2016
- QAP 2.9, "Qualification & Certification of NDE Personnel Under CP-189 & ASME Section XI," Revision 2, dated May 26, 2017
- QAP 4.1, "Procurement," Revision I, dated October 26, 2016

- QAP 5.1, "Preparation and Control of Quality Assurance Procedures," Revision 1, dated June 12, 2017
- QAP 7.1, "Supplier Surveillance," Revision 0, dated July 12, 2016
- QAP 7.2, "Vendor Evaluations-Nuclear," Revision 0, July 5, 2016
- QAP 7.2, "Vendor Evaluations-Nuclear, Revision 1, dated November 15, 2017
- QAP 15.1, "Control of Nonconforming Conditions," dated July 25, 2016
- QAP 15.2, "Procedure for Evaluating and Reporting of Defects, Noncompliance and Deficiencies to the NRC," Revision 0 dated July 7, 2016
- QAP 10.1, "Receipt Inspection of Materials," Revision 0, dated July 11, 2016
- QAP 10.1, "Receipt Inspection of Materials," Revision 1, dated November 15, 2017
- QAP 10.2, "Receipt Inspection of Vendor Documentation," Revision 0, dated July 12, 2016
- QAP 16.1, "Corrective Action Process," Revision 0, dated July 25, 2016
- QAP 17.1, "Quality Assurance Records," Revision 1, dated July 11, 2017
- QAP 18.1, "Audit Program," Revision 1, dated July 11, 2017
- QAP 18.1, "Audit program," Revision 2, dated November 15, 2017
- QAP 18.2, "Audit Report Evaluation," Revision 0, dated July 19, 2016

Procurement Documents

- Quality Solutions Approved Vendors List, dated September 26, 2017
- PO No. 2017-015 for UT equipment, dated July 17, 2017
- Receiving Inspection Report for UT equipment, dated November 15, 2017

Training Records

- Records File for Employee ID CHE-LCH-1888
- Records File for Employee ID CHE-TPR-6223
- Records File for Employee ID CHE-DJK-8726
- Records File for Employee ID LYN-JNP-9256
- Records File for Employee ID LYN-CGH-2495
- Records File for Employee ID HAR-DMT-8422
- Records File for Employee ID CHE-VAD-2544
- Records File for Employee ID No. 625349
- Records File for Employee ID No. 624648
- Records File for Employee ID No. 101207
- Record of Lead Auditor Qualification, dated March 27, 2012
- Record of Lead Auditor Qualification, dated December 30, 2015
- Record of Lead Auditor Qualification dated July 7, 2016
- Record of Lead Auditor Qualification, dated November 18, 2016
- Record of Lead Auditor Qualification, dated July 24, 2017
- Quality Control Certificate of Qualification for Inspector No. 624586, dated May 18, 2017