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 Office of Nuclear Reactor Regulation, Director (Post 870411)

SUBJECT: Part 21 rept re potential departure from the technical requirements included in procurement document.

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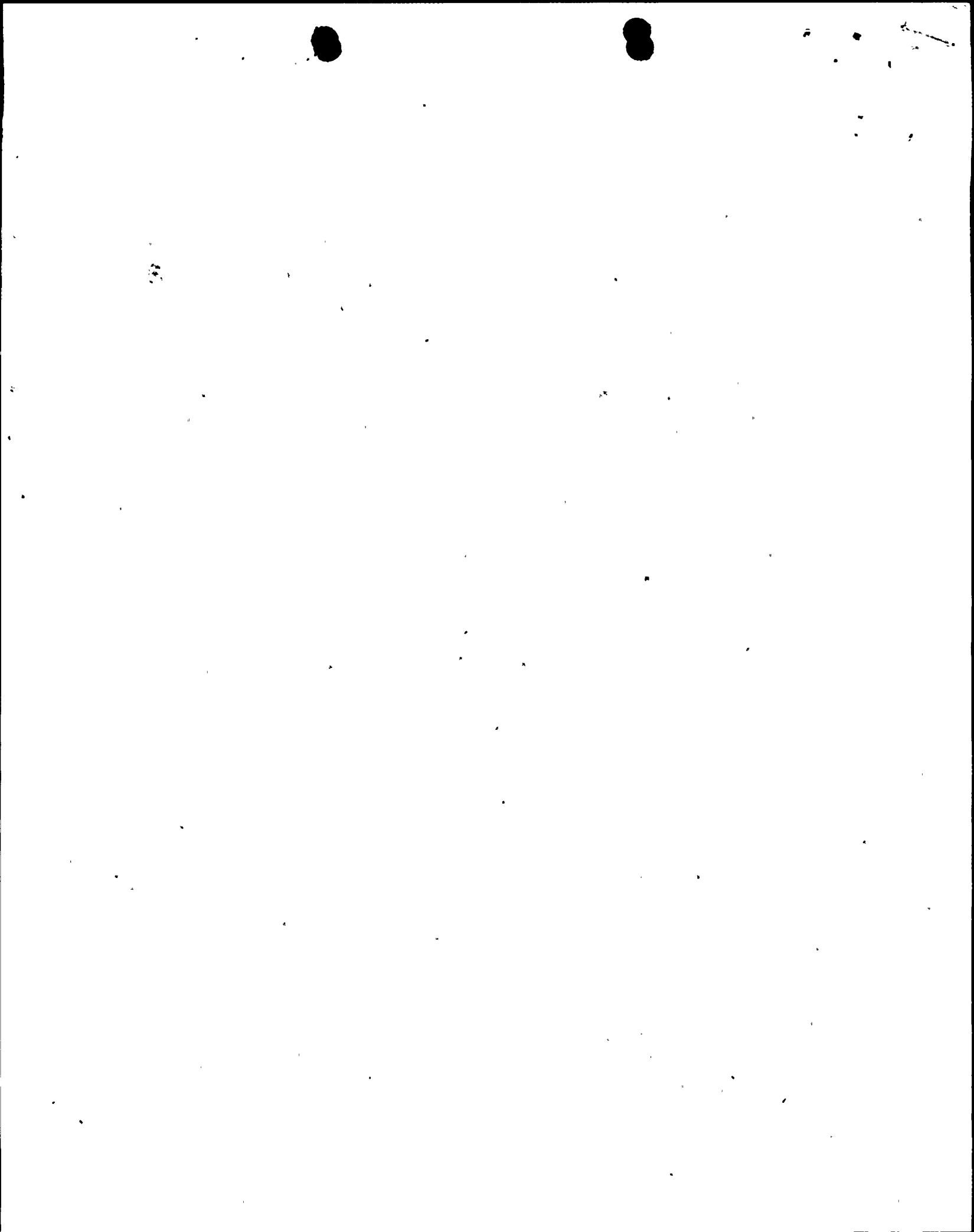
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April 10, 1989

U.S. Nuclear Regulatory Commission
Director of Nuclear Reactor Regulation
One White Flint North
11555 Rockville Pike
Rockville, Md 20852

Gentlemen:

Enclosed are three (3) copies of a written report required by 10CFR21.21 for notification of a potential departure from the technical requirements included in a procurement document. Verbal notification of this potential departure has been made by me to Mr. William L. Forney, Deputy Director, Division of Reactor Projects, NRC in Glen Ellen, IL on 4/6/89 at 1440. Should you have any questions concerning this written report, please feel free to contact Mr. Rod Witter, Quality Assurance Manager, or myself at 419/535-9555.

Sincerely,

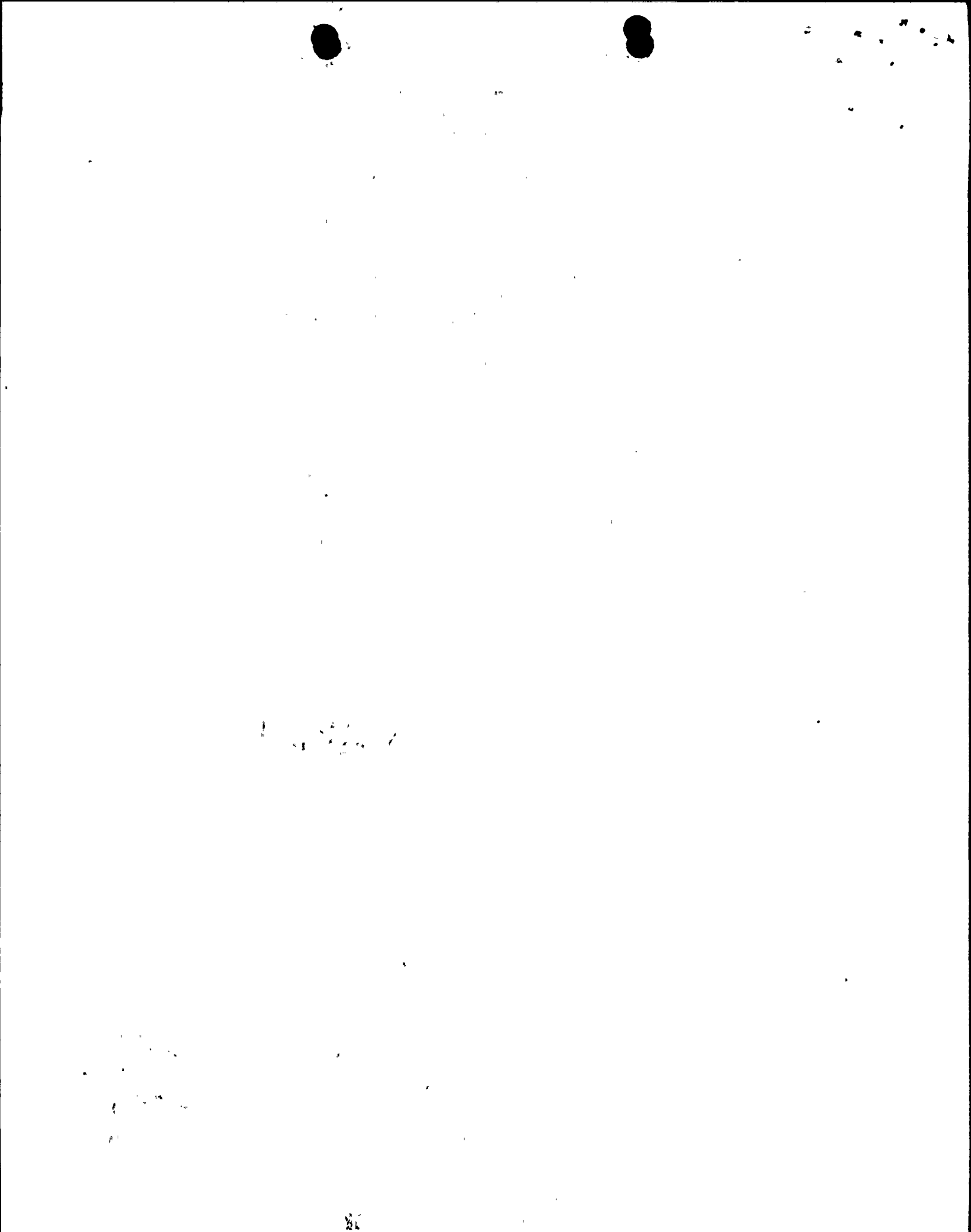
A handwritten signature in dark ink, appearing to read 'Jack F. Weed', is written over the typed name.

Jack F. Weed
President

Enclosure
JFW/mas

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POTENTIAL 10CFR21 DEFECT WRITTEN REPORT

10CFR21.21(b)(3) Requirement	10CFR21 Requirement Response
(i) Name and address of the individual or individuals informing the Commission.	Mr. Jack F. Weed Quality Services International, Inc. 5550 W. Central Ave., Suite C Toledo, OH 43615
(ii) Identification of the facility, the activity, or the basic component supplied for such facility or such activity within the United States which fails to comply or contains a defect.	ANSI N45.2.6 certification of Quality Control Inspection Personnel performing quality control inspections in an operating nuclear facility.
(iii) Identification of the firm constructing the facility or supplying the basic component which fails to comply or contains a defect.	Quality Control Inspection services being provided by: Quality Services International, Inc.(QSI) 5550 W. Central Ave., Suite C Toledo, Ohio 43615
(iv) Nature of the defect or failure to comply and the safety hazard which is created or could be created by such defect or failure to comply.	Level III Examiner personnel were not certified according to the requirements of ANSI N45.2.6-1978 which may have lead to inadequate certification of Level II quality control inspection personnel who have performed quality control inspections of safety-related equipment at the D.C. Cook Nuclear Plant.
(v) The date on which the information of such defect or failure to comply was obtained.	April 6, 1989
(vi) In the case of a basic component which contains a defect or fails to comply, the number and location of all such components in use at, supplied for, or being supplied for one or more facilities or activities subject to the regulations in this part.	These services have not been performed at any other facility.
(vii) The corrective action which has been, is being or will be taken; the name of the individual or organization responsible for the action; and the length of time that has been or will be taken to complete the action.	<p>Corrective Action Taken</p> <ul style="list-style-type: none"> • Stop Work has been issued by the client to prevent additional inspections from being performed until the personnel in question can be re-certified to an approved ANSI N45.2.6 program by a ANSI N45.2.6 certified Level III Examiner. (Completed 4/6/89 by American Electric Power Corporation) • QSI procedure for "Qualification of Examination, Inspection and Testing Personnel" has been revised to clarify Level III Examiner and Level II Inspection personnel certification requirements to ensure adherence to ANSI N45.2.6 - 1978 requirements. (Completed 4/7/89 by Jack Weed of QSI)

POTENTIAL 10CFR21 DEFECT WRITTEN REPORT

10CFR21.21(b)(3) Requirement	10CFR21 Requirement Response
(vii) (Continued)	<ul style="list-style-type: none"> • QSI Level III Examiner has been recertified under the revised certification program. (Completed 4/7/89 by Jack Weed of QSI) • New Quality Assurance Manager has been assigned within QSI who has responsibility for implementing the QSI QA Program which includes certification of ANSI N45.2.6 inspection personnel. (Completed 4/10/89 by Jack Weed of QSI) • Re-certify current Level II inspection personnel who are performing quality control inspection services at the D.C. Cook Nuclear Plant, according to the requirements of the revised certification program. (Completed 4/10/89 by Rod Witter of QSI) • Verify that previous QSI inspection personnel who have performed quality control inspection services of safety-related equipment at the D.C. Cook Nuclear Plant were qualified to perform those inspections according to ANSI N45.2.6 - 1978 requirements. (Being completed by American Electric Power Corporation)
(viii) Any advice related to the defect or failure to comply about the facility, activity, or basic component that has been, is being, or will be given to purchasers or licensees.	<p>This potential defect is procedure-related and not substantive in nature. There is not a genuine concern being expressed by QSI regarding the qualifications of the inspection personnel in question as they have performed these same services as ANSI N45.2.6 certified Level II inspection personnel at a variety of other nuclear facilities throughout the industry before being certified by QSI to perform these same services at the D.C. Cook Nuclear Plant.</p>

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