



SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. CERTIFICATE/QUALITY ASSURANCE PROGRAM (QAP) HOLDER:

DAHER-TLI
8161 Maple Lawn Boulevard, Suite 450
Fulton, MD 20759

2. NRC/REGIONAL OFFICE

Headquarters
U. S. Nuclear Regulatory Commission
Mail Stop 3 WFN 14C-28
Washington, DC 20555-0001

REPORT NUMBER(S)

3. CERTIFICATE/QAP DOCKET NUMBER(S)

71-9342

4. INSPECTION LOCATION

Container Products Corporation (CPC)
Wilmington, NC 28405

5. DATE(S) OF INSPECTION

February 4-7, 2019

CERTIFICATE/QUALITY ASSURANCE PROGRAM HOLDER:

The inspection was an examination of the activities conducted under your QAP as they relate to compliance with the Nuclear Regulatory Commission (NRC) rules and regulations and the conditions of your QAP Approval and/or Certificate(s) of Compliance. The inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector. The inspection findings are as follows:

- 1. Based on the inspection findings, no violations were identified.
- 2. Previous violation(s) closed.
- 3. The violation(s), specifically described to you by the inspector as non-cited violations, are not being cited because they were self-identified, non-repetitive, and corrective action was or is being taken, and the remaining criteria in the NRC Enforcement Policy, to exercise discretion, were satisfied.

4 Non-cited violation(s) was/were discussed involving the following requirement(s) and Corrective Action(s):

1. Title 10 of the Code of Federal Regulations (10 CFR), 10 CFR 71.107, requires, in part, that the certificate holder shall establish measures to assure that applicable regulatory requirements and the package design, as specified in the CoC, are correctly translated into specifications, drawings, procedures, and instructions. Contrary to, DAHER-TLI failed to identify the incorrect transfer of a weld symbol from a licensing drawing to the fabrication drawing. DAHER-TLI entered this violation into their corrective action program for resolution. (Continue next page)

- 4. During this inspection, certain of your activities, as described below and/or attached, were in violation of NRC requirements and are being cited in accordance with NRC Enforcement Policy. This form is a NOTICE OF VIOLATION, which may be subject to posting in accordance with 10 CFR 19.11. (Violations and Corrective Actions)

Statement of Corrective Actions

I hereby state that, within 30 days, the actions described by me to the Inspector will be taken to correct the violations identified. This statement of corrective actions is made in accordance with the requirements of 10 CFR 2.201 (corrective steps already taken, corrective steps which will be taken, date when full compliance will be achieved). I understand that no further written response to NRC will be required, unless specifically requested.

TITLE	PRINTED NAME	SIGNATURE	DATE
CERTIFICATE/QAP REPRESENTATIVE	Tom Barron, TLI Quality Assurance, Director	<i>Tom Barron</i>	3/20/19
NRC INSPECTOR	Carla P. Roque-Cruz	<i>Carla P. Roque-Cruz</i>	3/21/19
BRANCH CHIEF	Damaris Marcano	<i>Damaris Marcano</i>	3/25/19

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2. Title 10 of the Code of Federal Regulations (10 CFR), 10 CFR 71.111, "Instructions, procedures, and drawings", requires, in part, that the certificate holder (CPC represents the CoC holder DAHER-TLI) shall prescribe activities affecting quality by documented instructions, procedures, or drawings of a type appropriated to the circumstances and shall require that these instructions, and procedures, and drawings be followed. Contrary to, CPC failed to follow its QA established procedures during the following instances: (1) procedure requirement to initial and date the review of calibration records when received and to perform evaluations for M&TE found out of calibration; (2) procedure requirement to rubber stamped revised manufacturing drawings before re-distributing the drawings; and (3) procedure requirement to assess suppliers through an audit every three years in order to keep them in their Approved Suppliers List.

3. Title 10 of the Code of Federal Regulations (10 CFR), 10 CFR 71.115, "Control of purchased material, equipment, and services" requires, in part, that the certificate holder (CPC represents the CoC holder DAHER-TLI) shall establish measures to assure that purchased material, equipment, and services, whether purchased directly or through contractors and subcontractors, conform to the procurement documents. Contrary to, CPC failed to verify that procured material conformed to the procurement documents during the following instances: (1) procurement of "mercury-free" sheet metal; (2) procurement of gasket material between 50 and 70 durometer hardness; and (3) procurement of steel drum used for handling of the VP-55.

4. Title 10 of the Code of Federal Regulations (10 CFR), 10 CFR 71.137, "Audits", requires, in part, that the certificate holder shall carry out a comprehensive system of planned and periodic audits to verify compliance with all aspects of the quality assurance program and to determine the effectiveness of the program. Contrary to, during the last internal audit performed from August 2016 to November 2018 in three separate partial audits, one of the individuals in the audit team, during all three partial audits, had direct responsibilities for some of the areas audited. Therefore, CPC failed to perform independent audits.