

APPENDIX A

NOTICE OF NONCONFORMANCE

During an inspection conducted on September 12 and 13, 1989, the implementation of the Quality Assurance (QA) program at Rotork Controls, Incorporated (Rotork) in Rochester, New York was reviewed with respect to the assembly of electric motor operators for valves. The applicable QA program requirements are Appendix B to 10 CFR Part 50, ANSI N45.2, and Rotork's QA manual. Based on the results of this inspection, it appears that activities at the Rotork facility were not conducted in accordance with these commitments. These items are listed below.

- A. Criterion III, "Design Control," of Appendix B to 10 CFR Part 50 states in part: "Measures shall be established to assure that applicable regulatory requirements and the design basis...are correctly translated into specifications, drawings, procedures and instructions. These measures shall include provisions to assure that appropriate quality standards are specified and included in the design documents...Measures shall also be established for the selection and review for suitability of application of materials, parts, equipment, and processes that are essential to the safety-related functions of the structures, systems, and components."
1. Paragraph 4.2 of Section 3, "Design Control," of Rotork's Quality Control (QC) manual states, in part: "Rotork products are supplied to a customer's specification and not specifically designed to it. Exceptions are dealt with through a non-standard product request system."

Paragraph 4.2.1 of Section 3.0 states; "A non-standard product form originates with the contract office, listing the special requirements for a particular order. The document is routed through Contracts, Engineering, and Manufacturing. All nuclear concessions would also be reviewed by Quality Assurance."

Contrary to the above requirements, on Anchor Darling Valve Company Purchase Order G-1942, and Revision 1 to the Purchase Order, for two P-25008 pneumatic actuators, including two ASCO solenoid valves qualified to IEEE-323 and 344, ordered to be manufactured under Rotork's Quality Control Manual; Rotork personnel failed to route Nonstandard Product Request Forms 916 and 1087 to the QA Manager for review and approval. (89-01-01)

2. List of Parts, LOP 050, requires Item 69, the 3/8" diameter, 1" long sockethead capscrews that hold the thrust ring in place to have a tensile strength of 70 tons/square inch.

Contrary to the above, Rotork ordered these capscrews as commercial grade items and did not perform any activity to assure the capscrews received are suitable. (89-01-02)

- B. Criterion IV, "Procurement Document Control," of Appendix B to 10 CFR 50 states in part: "Measures shall be established to assure that the applicable regulatory requirements, design bases, and other requirements which are necessary to assure adequate quality are suitably included or referenced in the documents for procurement of material, equipment and services...to the extent necessary, procurement documents shall require contractors or subcontractors to provide a quality assurance program consistent with the pertinent provisions of this appendix."

Paragraph 5, "Procurement Document Control" of ANSI N45.2 states in part: "Procurement documents shall include provisions for the following, as applicable...(5) Lower Tier Procurements. Provisions for extending applicable requirements of procurement documents to lower tier subcontractors and suppliers."

Paragraph 3.6 of Section 4.0 "Purchase Document Control," of Rotork's QA Manual states that: "All POs of nuclear class items shall be approved and cosigned by a Quality Assurance Manager."

1. Contrary to the above, Paragraph 3.4, "Purchased Material Control," of Appendix A, "Supplier Quality Assurance Policy, to Section 7, "Control of Purchased Material, Equipment, and Services, of Rotork's QA Manual does not require Rotork's suppliers to pass down any QA requirements regardless of the material, equipment, or service being purchased. (89-01-03)
2. Contrary to the above, 2 POs to ASCO, PO 30878 dated September 8, 1988 and PO 32079 dated May 9, 1989, for solenoid valves qualified to IEEE-323 and 344 were not approved by the QA Manager and did not include appropriate QA requirements. (89-01-04)

- C. Criterion V, "Instructions, Procedures, and Drawings," of Appendix B to 10 CFR 50 states: "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions procedures, or drawings."

Contrary to the above, Rotork had no documented instructions or procedures on how items returned from customers were to be handled. As a result, on Anchor Darling Valve Company PO G-1942, and Revision 1 to the PO, replacement ASCO solenoid valves, required to be qualified to IEEE-323 and 344 were ordered without imposing the necessary QA requirements. (89-01-05)