

## NOTICE OF NONCONFORMANCE

Westlectric Castings, Incorporated  
City of Commerce, California

Docket No.: 99901323

Based on the results of an inspection conducted on November 17 through 19, 1997, it appears that certain of your activities were not conducted in accordance with NRC requirements.

- A. Criterion I, "Organization," of 10 CFR Part 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," (Appendix B), requires in part, that the authority and duties of persons and organizations performing activities affecting the safety-related functions of structures, systems, and components shall be clearly established and delineated in writing.

Criterion II, "Quality Assurance Program," of Appendix B, requires that a quality assurance program which complies with the requirements of Appendix B be established.

Westlectric CAM Procedure Section 1.0, "General Policy," states that "all inspectors, including M.T. and P.T. Level II who are under the direct supervision of the Quality Assurance Assistant are responsible for the proper execution of required N.D.T."

Contrary to the above, the NRC found that the authority and duties of all Westlectric Quality Assurance department personnel were not accurately delineated in the Westlectric Quality Assurance Manual (QAM), Revision K, dated October 14, 1996. Specifically, (Nonconformance 99901323/97-01-02)

- 1) Westlectric has not had a QA Assistant since approximately 1991.
  - 2) Until recently the visual inspector worked for and reported to production department personnel.
  - 3) Westlectric has had only one NDE certified inspector (Level II) since approximately 1990 even though the QAM indicates it has multiple NDE Inspectors.
  - 4) The Level II NDE Inspector also holds the position of "Chief Inspector," the authority and responsibilities of the Chief Inspector were not delineated in the QAM.
  - 5) The only Westlectric NDE Inspector (the Chief Inspector/Level II NDE Inspector) reports to the Operations Manager, who is responsible for the activity being inspected.
  - 6) Although both Westlectric visual inspectors report to the QA Manager, they also take NDE and inspection direction from the Chief Inspector/Level II NDE Inspector.
- B. Criterion V, "Instructions, Procedures, and Drawings," of Appendix B requires that activities affecting quality be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances; all be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or

drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Paragraph 1.4 of Section 3.0, "Quality Control Department Operation and Duties Procedure," of Westlectric's QAM states: the QA Manager will maintain a file in his office of all inspection stamps issued to workers.

Paragraph 1.2 of Section 19.0, "Casting Traceability," of Westlectric's QAM states heat code numbers shall be affixed to pattern with raised aluminum letters or pressed into molding sand with letters attached to a handle.

Contrary to the above: (Nonconformance 99901323/97-01-03)

- 1) two inspection signature stamps, used for the stamping of approval signatures on Westlectric CMTRs and NDE records, in the possession of the Chief Inspector and QA Manager were not identified as being issued on the QA manager's inspection stamp file. As a result, no record existed regarding the signature stamps even though they were used for approving quality records.
- 2) Although Westlectric's manufacturing process can result in situations where heat numbers are occasionally changed, the QAM and implementing procedures did not specify that grinding out portions of cast heat numbers and replacing them with stamped numbers was an allowable practice.

- C. Criterion XII, "Control of Measuring and Test Equipment," of Appendix B requires that measures shall be established to assure that tools, gages, instruments, and other measuring and testing devices used in activities affecting quality are properly controlled, calibrated, and adjusted at specified periods to maintain accuracy within necessary limits.

Criterion XVII, "Quality Assurance Records," of Appendix B requires that sufficient records be maintained to furnish evidence of activities affecting quality. The records will include at least the following: Operational logs and the results of reviews, inspections, tests, audits, monitoring of work performance, and materials analyses. The records shall also include closely-related data such as qualifications of personnel, procedures, and equipment. Records shall be identifiable and retrievable.

Westlectric QAM Procedure Section 16.0, "Calibration Procedures," states that "all calibration shall be performed in accordance with MIL-C-45662 by a qualified outside calibration source and traceable to NIST Standards."

Contrary to the above, Westlectric staff was unable to provide calibration records for the spectrometer curve-sets, did not have traceability to NIST for its standards, and did not have adequate information regarding the accuracy of the curve-sets. Additionally, Westlectric did not establish specific documented procedures or instructions delineating acceptance and rejection limits on the analysis range for each element affected by one-point standardization. (Nonconformance 99901323/97-01-04)

- D. Criterion IX, "Control of Special Processes," of Appendix B requires that measures be established to assure that special processes, including welding, heat treating, and nondestructive testing, are controlled and accomplished by qualified personnel using

qualified procedures in accordance with applicable codes, standards, specifications, criteria, and other special requirements.

Paragraph 1.5.1 of Procedure 11.0, "Metal Control," of Westlectric's QAM stated the chemical analysis testing shall be performed by a trained laboratory technician.

Contrary to the above, Westlectric did not establish adequate procedures or appropriately trained personnel to control its spectrometer chemical analysis' operation.  
(Nonconformance 99901323/97-01-05)

Please provide a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555, with a copy to the Chief, Quality Assurance, Vendor Inspection and Maintenance Branch, Division of Reactor Controls and Human Factors, Office of Nuclear Reactor Regulation, within 30 days of the date of the letter transmitting this Notice of Nonconformance. This reply should be clearly marked as a "Reply to a Notice of Nonconformance" and should include for each nonconformance:

(1) a description of steps that have been or will be taken to correct these items; (2) a description of steps that have been or will be taken to prevent recurrence; and (3) the dates your corrective actions and preventive measures were or will be completed.

Dated at Rockville, Maryland  
this 26<sup>th</sup> day of January 1998