

APPENDIX B

D. G. O'Brien, Inc.
Docket No. 99900326/83-01

NOTICE OF NONCONFORMANCE

Based on the results of an NRC inspection conducted on April 4-8, 1983, it appears that certain of your activities were not conducted in accordance with NRC requirements as indicated below:

Criterion V of Appendix B to 10 CFR Part 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. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

Nonconformances with these requirements are as follows:

- A. Contrary to the requirements of Criterion V of Appendix B to 10 CFR Part 50, D. G. O'Brien (DGO) did not establish documented procedures to describe how deviations from approved test procedures are documented and controlled.
- B. Paragraph 5.5, Section 15 of the Quality Assurance Manual (QAM), dated August 11, 1982, states, in part, "In the event of deficiencies, corrective action will be required by the responsible DGO manager/supervisor using a corrective action report (Exhibit #x15.2) which will be documented with the audit results. . . . Replies to corrective action notices by the responsible person must be made within 7 days of the issue date."

Contrary to the above, replies to corrective action reports Nos. 249, 247A, and 247B were not made within the required time frame.

- C. Paragraph 3.3, Section 2 of the QAM, dated August 11, 1982, entitled "Responsibilities of Quality Assurance and Quality Control" states, in part, "Review and Approve Purchase Requisitions, (Exhibit No. 2.1) Imposing Quality Assurance Requirements (Exhibit No. X2.2)." In addition, customer Purchase Orders 69758 (DGO Job No. 65001) and F12645-32 (DGO Job. No. 62026), all for the procurement of Class 1E safety-related equipment, contained the requirement that work performed be accomplished under a quality assurance program meeting the requirements of ANSI N45.2 or 10 CFR Part 50, Appendix B.

Contrary to the above, DGO procured safety-related testing services used to fulfill the qualification testing requirements contained in the above purchase orders/contracts without specifying the required quality assurance requirements to their vendors. These services were procured under the following DGO purchase orders: 62003-48, 62003-47, 62003-45, 62003-36, 62003-35, 62003-32, 62003-26, 62003-25, and 62003-24.

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- D. Paragraph 8.1, Section 15 of the QAM, dated August 11, 1982, states, in part, "Qualified vendor list must include all qualified vendors." In addition, paragraph 4.6 of Section 2 of the QAM states, in part, "Vendors shall be qualified initially by survey, and requalified annually by audit, or. . . . In either case qualified status must be established prior to the issuance of a purchase order."

Contrary to the above, DGO issued purchase orders for safety-related testing services to firms that were not listed on the qualified vendor list (applicable at the date of issuance).

- E. Paragraph 2.9 of Quality Procedure SS-QA-150, Revision A, dated June 26, 1979, states, "Employees that have been trained in the past must have a refresher using the latest QA Manual and the latest revised procedures at least every 6 months."

Contrary to the above, there was no documented objective evidence that training for all applicable areas of the QAM, as defined by the engineering department training matrix, had been given to engineering department employees during the required 6-month period.