Inryco, Inc.,
Concrete Systems Division
Docket No. 99900731/81-01

NOTICE OF NONCONFORMANCE

Based on the results of an NRC inspection conducted on July 13-17, 1981, 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. Procedure No. QC 5.2, paragraph 2.13.1 states, in part, "After the tendons have been inspected and accepted by the Inryco Inspector, the shipping documentation will be prepared to accompany the shipment. This documentation will be of such a nature, so as to establish complete identity and traceability of those components requiring that control, within that shipment . . . ."

Procedure QCP 4, second paragraph states, in part, "The Vendor or Inryco Quality Control Inspector will notify the Quality Assurance Section when a nonconforming item is found. A Nonconformance Report will be filed by Quality Assurance or Shop Inspector . . . ."

Contrary to the above:

1. The shipping documentation for tendon no. H32-018 which was released for shipment to the Consumers Power Company Midland Plant on June 5, 1980, did not establish complete component identity and traceability; as evidenced by an anchorhead in the tendon being incorrectly identified by stamping and the shipping documentation as heat code NC material, when, in fact, the anchorhead had been manufactured from heat code LP material.

2. Inryco became aware of the identification error involving a total of seven anchorheads in April 1981, but did not generate a nonconformance report in regard to the tendon no. H32-018 anchorhead until after the item was identified by the NRC inspector on July 14, 1981.

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B. QA Manual, Title XVII, paragraphs 1, 2, and 3 state, in part, "Documentation to furnish objective evidence of compliance to the approved drawings, specifications and/or procedures relative to the quality of items and activities affecting quality will be provided for the contract materials or services . . . . The documentation will include . . . the results of reviews, inspections, . . . analyses . . . material specifications . . . .

"Specific sign off responsibilities are assigned to the Quality Control and Quality Assurance Sections for approval of . . . mill test reports . . . ."

Contrary to the above, documentation which had been reviewed and approved by QA/QC sections pertaining to anchorheads furnished to the Bellefonte Nuclear Plant and the Midland Plant, identified the wrong grade of steel. Heat treatment, inspection records, and the Certificate of Material Analysis which was provided by Inryco's material supplier showed the material to be AISI 4142. Review of the Certified Mill Test Report from the material manufacturer showed the material to be AISI 4140.

C. Nonconformance Item B.2 in Inspection Report No. 80-01 addresses certain nonconformance/corrective action reports (NC/CA) not documenting dispositions or corrective actions, and that approval blocks were not being signed off by appropriate Inryco personnel. Inryco's response letter dated March 23, 1981, addressed the specific NC/CAs and their actions to correct them. A subsequent NRC letter to Inryco, dated May 18, 1981, requested additional information pertaining to Inryco's actions to prevent recurrence. Inryco's response letter dated June 26, 1981, states, "The review of existing records and close out of dispositioned nonconformances was in the process of being completed during the last Inryco tendon fabrication audit. This item will be ready for the (NRC) compliance re-audit scheduled to be performed on July 13, 1981."

Contrary to the above, the specific NC/CAs that had been identified as being deficient had not been reviewed and closed out, as evidenced by the same conditions still existing during the inspection conducted the week of July 13, 1981. It should be noted that there was evidence of Inryco's review of other NC/CA files (NC/CAs are maintained by Job Number).

D. Paragraph 4 in Title VII of the QA Manual states in part, ". . . the responsible Procurement Section will request that a vendor be added to the Quality Assurance Approved Vendor List (AVL). The Quality Assurance Section will conduct an approval investigation to determine the ability of that source to provide the required material or service to the appropriate quality procedure, drawing, or material specification.

Purchase orders will be submitted to the vendor only after approval of that source by the Quality Assurance Section . . . ."

Contrary to the above, Purchase Order 41P00491 was submitted to Unigage Instruments Corporation for the acquisition and calibration of micrometers, without requesting or receiving approval of the source from the Quality Assurance Section.

E. The Inryco corrective action response letter of June 26, 1981, states, in part, with respect to Nonconformance Item C in Inspection Report No. 80-01, pertaining to the failure to include certain nonconforming coils of wire in a nonconformance report, "We will continue to live with the commitment to distribute the report within 30 days . . . . The NCR should have been immediately issued with a statement that supplementary documents would be forthcoming for the remaining material on the purchase order. The QA/QC personnel have been advised to issue the NCR as soon as possible and provide supplemental information related to that deficiency at a later date."

Contrary to the above, a nonconformance report had not been distributed within 30 days in regard to identified bushing measurement nonconformances with the requirements of QCP No. 5.2.3-781, Revision 3.

This was identified during review of dimensional compliance data (dated June 3, 1981) which had been generated from a measurement program, that had been implemented as corrective action for reported anchorage material dimensional discrepancies at Braidwood, Unit 1, and Bellefonte, Units 1 and 2. It should be noted that the dimensionally nonconforming items were segregated in a hold area.