

APPENDIX A

NOTICE OF NONCONFORMANCE

Based on the results of an NRC inspection conducted October 17 through 19, 1988, it appears that certain of your activities were not conducted in accordance with NRC requirements which were imposed on you by purchase order contracts with NRC licensees. Nonconformances with these requirements are as follows:

- A. Criterion V of Appendix B to 10 CFR Part 50, "Instructions, Procedures, and Drawings," 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."

Contrary to the above, Power Distribution Technology procedure PDT-QA-07, "Document Control and Distribution," was not appropriate to the circumstances in that it did not require that current revisions to vendor technical manuals and product bulletins be obtained and used for work performed on safety-related circuit breakers. (88-01-01)

- B. Criterion XI of Appendix B to 10 CFR Part 50, "Test Control," states, in part: "A test program shall be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents...."

Contrary to the above, Power Distribution Technology test procedure PDT-OP-04 did not incorporate acceptance limits contained in applicable design documents in that the trip time acceptance limits listed in the procedure were taken from a combination of sample curves in the vendor technical manual generated for a particular set of pickup and delay settings that may be (and, in the cited instance, were) different from those of breakers under test.