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SENIOR VICE PRESIDENT

August 2, 1982

United States Nuclear Regulatory
Commission, Region IV
Suite 1000
611 Ryan Plaza Drive
Arlington, Texas 76011

Attention: Mr. Uldis Potapovs, Chief
Vendor Programs Branch

Subject: Docket No. 99900516/82-01
Inspection of NUS Corporation -- May 24-28, 1982

Dear Mr. Potapovs:

This letter transmits NUS Corporation's responses to the subject Nuclear Regulatory Commission inspection report which was forwarded to NUS on July 14, 1982.

In accordance with the instructions contained in the Nuclear Regulatory Commission transmittal letter, the NUS responses are organized in the following manner:

- (1) A description of the steps taken or being taken to correct the cited nonconformances.
- (2) A description of the steps taken or being taken to prevent recurrence of the cited nonconformances.
- (3) The schedule for completion of corrective actions and preventive measures.

NUS review of the information included in the inspection report has determined that there are no proprietary interests involved; therefore, an exemption from disclosure under the provisions of 10CFR9.5 (a)(4) is not being requested.

We trust that you will find the responses positive in nature and the stated corrective actions verifiable at your next scheduled inspection.

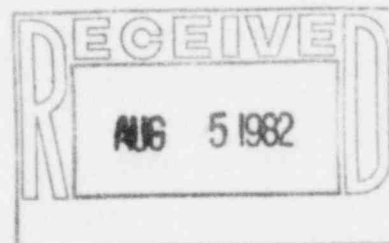
Very truly yours,

William J. Gallagher

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Enclosure: Appendix A, NUS Responses to
NRC Inspection Report, Docket
Number 99900516/82-01

cc: M. R. Booska
J. N. Sorensen



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APPENDIX A

NUS RESPONSES TO NRC NOTICE OF NONCONFORMANCE DOCKET NUMBER 9900516/82-01

NONCONFORMANCE B.1 - CONSULTING DIVISION

Contrary to Criterion V of Appendix B to 10CFR Part 50, Section 7.4 of QAP 2.3, and Section 7.2 of QAP 6.1, a review of document control activities for one project (no. 3366) revealed the following: QA personnel and the Operations Manager in the NUS-Gaithersburg, Maryland, Office did not receive any copies of controlled documents, including the QA Plan; and there was no evidence of Document Transmittal Forms or a Document Receipt Log.

NUS RESPONSE*

- (1) Copies of controlled documents for Project 3366 will be transmitted to appropriate personnel in Gaithersburg.

Transmittal forms will be used as required by procedure and a document receipt log will be established.

- (2) Other safety related projects have been reviewed to verify that document transmittal included proper distribution, that document transmittal forms were being used, and that document receipt logs were being established. Project 3366 was the only project with the documentation problem identified. Personnel associated with that project have been made aware of Consulting Division requirements.

- (3) Corrective action will be complete August 31, 1982.

NONCONFORMANCE B.2 - CONSULTING DIVISION

Contrary to Criterion V of Appendix B to 10CFR Part 50, Section 1.1 of QAR 17.0, Sections 7.1 and 7.2 of QAP 17.1, and Section 7.1.2 of QAP 17.3, a review of QA records and documentation supplied to the NRC inspector revealed the following: QA Record Index was missing for two projects; QA Record Log was missing for five projects; audit reports for 1981 and one QA Plan were not identified as QA records; and personnel qualifications were missing.

NUS RESPONSE - QA RECORD INDEX (B.2.1)

- (1) The purpose of the Records Index is to provide information on the structure of the Records Log at the outset of the project. After the Records Log has been developed, the Records Index has no further use. Since both projects reviewed by the NRC Inspector have been completed, no Records Index will be generated as it would serve no purpose at this time.

* Responses are provided in three parts: (1) action taken to correct the discrepancy; (2) steps taken to prevent recurrence; (3) date corrective action was completed or will be completed.

- (2) The NRC finding resulted in a re-examination of the Consulting Division requirements for the identification of quality assurance records. At present, our system lists in QAR 17.0 types of records to be kept and requires that records to be kept shall be identified in the Project Quality Assurance Plan and in a Records Index. A Records Log is also required. Our re-examination led to the conclusion that the system is redundant. We will continue to require that the Project Manager identify in his Project QA Plan those records which are to be kept, and we will continue to require a Records Log. The requirement for a Records Index will be removed from the Consulting Division QA Program.
- (3) The Consulting Division QA Manual will be revised to remove the Records Index requirement by September 30, 1982.

NUS RESPONSE - QA RECORD LOG (B.2.2)

- (1) Records Logs for all projects and for generic Consulting Division records are being reviewed in detail. Where they have not been established, they are being prepared, and those which are in existence are being corrected and updated.
- (2) A Consulting Division management notice will be sent to personnel responsible for maintaining QA records, calling their attention to the specific requirements for Records Logs and directing them to ensure compliance with this requirement. Additional emphasis will be placed on this topic during regularly scheduled QA training sessions.
- (3) Records Logs preparation and correction will be completed by October 15, 1982.

NUS RESPONSE - QA RECORD STAMPS (B.2.3)

- (1) All QA records which have been generated since the beginning of 1981 are being reviewed for a "QA Record" stamp. Those which have been stamped are being correctly identified.
- (2) A Consulting Division management notice will be sent to personnel responsible for QA records identification, reminding them of the specific Division requirements for QA records identification and directing them to ensure compliance with this requirement. Additional emphasis will be placed on this topic during regularly scheduled QA training sessions.
- (3) All records will be properly identified by October 15, 1982.

NUS RESPONSE - PERSONNEL QUALIFICATION RECORDS (B.2.4)

- (1) All personnel qualification records are being transferred from project files and placed in the QA files.
- (2) A Consulting Division management notice will be sent to personnel responsible for personnel qualification records, reminding them of specific requirements and directing them to ensure compliance with these requirements. Additional emphasis will be placed on this topic during regularly scheduled QA training sessions.
- (3) All personnel qualifications records will be centralized and properly identified by October 15, 1982.