

APPENDIX A

Chem-Nuclear Systems, Inc.
Docket No. 99900776/82-01

NOTICE OF NONCONFORMANCE

Based on the results of an NRC inspection conducted on May 17-19, 1982, it appears that certain of your activities were not conducted in accordance with NRC requirements as indicated below:

Criterion 5 of Appendix E to 10 CFR Part 71 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. These shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

Chem-Nuclear Systems corporate procedure CN-AD-015, "Nonconforming Item Procedure," states in paragraph 4.1.1: "Any part, component, structure, system, activity, or facility that does not conform to established procedures, specifications, policies, standards, regulations, or instructions shall be identified as nonconforming." Paragraph 4.2.1 states in part: "Nonconformances shall be documented by: . . . the CNST Nonconformance Report (NCR) form for internal nonconforming items or activities."

Contrary to the above, several nonconforming conditions (e.g., (1) missing shield rings on both casks; (2) a missing vent valve on cask Serial Number 2; and (3) the use of Buna N and not silicone rubber O-rings on both casks) were identified on the two Vandenberg model casks without being documented on NCR forms.