



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D. C. 20585-0001

March 2, 1994

Docket No. 99901235

Mr. Hans Herlof Hardtke  
Geschäftsführer - President  
Lisega GmbH  
Postfach 13 57  
Industriegebiet Hochkamp  
D-2730 Zeven, Germany

Dear Mr. Hardtke:

SUBJECT: NOTICE OF VIOLATION AND NOTICE OF NONCONFORMANCE  
(NRC INSPECTION REPORT NO. 99901235/93-01)

This letter transmits the report of the U.S. Nuclear Regulatory Commission (NRC) inspection conducted by Steven M. Matthews and Stephen D. Alexander of this office on September 28 through October 1, 1993, and the discussion of their findings with you and other members of your staff at the conclusion of the inspection. The purpose of the performance-based inspection at the corporate offices of Lisega GmbH (Lisega), Zeven, Germany, was to evaluate your quality program and its implementation related to the supply of standard component supports to the nuclear industry, and to review the corrective actions that you had taken in response to the Notice of Nonconformance issued with our letter to you dated October 19, 1992.

Areas examined during the inspection and our findings are discussed in the enclosed report. This inspection consisted of an examination of procedures and representative records, interviews with personnel, and observations by the team.

The inspection resolved certain issues related to the procurement and commercial grade dedication of materials used in safety-related spring hangers, constant supports, rigid struts, and hydraulic snubbers that Lisega supplied to the U.S. nuclear industry as complying with the requirements of the American Society of Mechanical Engineers, Boiler and Pressure Vessel Code, and the NRC's requirements in Appendix B to Part 50 of Title 10 of the Code of Federal Regulations, (10 CFR Part 50) and 10 CFR Part 21. The team also reviewed Lisega's corrective actions taken for nonconformances identified during previous NRC inspections and determined that the actions taken to achieve full compliance were adequate to resolve the concerns and close the nonconformances.

However, based on the results of this inspection, certain parts of your 10 CFR Part 21 implementation program appeared to be in violation of NRC requirements, as specified in the enclosed Notice of Violation. The violation of 10 CFR Part 21 is related to your procedure adopted pursuant to the regulation. The procedure had not been updated to include certain provisions of the regulation in accordance with the version of 10 CFR Part 21 that became

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effective on October 29, 1991. However, the team found no instances in which potential 10 CFR Part 21 issues were not properly dispositioned. The specific findings and references to the pertinent requirements are identified in the enclosed Notice of Violation and inspection report.

Also, during this inspection, it was found that the implementation of your quality assurance program failed to meet certain NRC requirements. Specifically, your process for acceptance of hydraulic snubber fluid failed to identify that according to the fluid manufacturer's specifications, the fluid would not meet your customer's hydraulic snubber procurement specifications for minimum fluid viscosity at elevated temperatures. The specific findings and references to the pertinent requirements are identified in the enclosed Notice of Nonconformance and inspection report.

You are requested to respond to this letter and should follow the instructions specified in the enclosed Notices when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. Please provide your written response within 30 days from the date of this letter.

In accordance with 10 CFR 2.790(a) of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be placed in the NRC Public Document Room. The responses requested by this letter and the enclosed Notices are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Public Law No. 96-511.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you. Thank you for your cooperation during this inspection.

Sincerely,

Leif J. Norrholm, Chief  
Vendor Inspection Branch  
Division of Reactor Inspection  
and Licensee Performance  
Office of Nuclear Reactor Regulation

Enclosures:

1. Notice of Violation
2. Notice of Nonconformance
3. Inspection Report No. 99901235/93-01

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Mr. Hardtke

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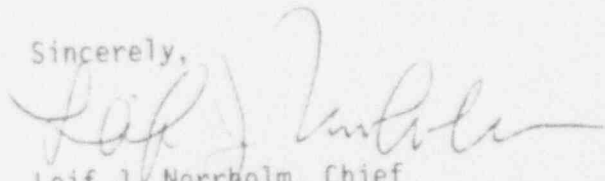
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