

APPENDIX A

Rockwell International, Inc.  
Docket No. 99900266/82-02

NOTICE OF NONCONFORMANCE

Based on the results of an NRC inspection conducted on October 25-29, 1982, 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. Paragraph 3.3 in Section N4.00 of the Energy Systems Group (ESG) QA Manual states, in part, "QA Engineering review of Purchase Orders shall assure that no changes have been made to the technical/quality requirements shown on the initiating purchase requisition, and that, if required, the supplier is an approved source. When reviewing a purchase order to verify that the supplier selected is an approved source, QA Engineering shall also verify that any conditions of the approval that are specified on ESG's list of approved suppliers are suitable for the particular type of procurement . . . ."

In addition, paragraph 4.1 states, in part, "When determining whether or not procurement quality verification is required and, if so, to what extent, the QA Engineer must be cognizant of the program/project requirements and assure that quality elements are properly addressed. As a minimum quality verification at source and/or receipt should be required for procurements of the following . . . b. Items classified as nuclear safety related, Class 1-E (i.e., IEEE 323 qualified) or services related to those items. c. Items/services upon which a nuclear quality system is imposed (10 CFR 50 Appendix B . . . ."

Contrary to the above: (1) two purchase orders were issued to a vendor for the supply of nuclear safety related wire who had not been listed by ESG as an approved source; and (2) quality verification at source and/or receipt for the safety related wire was not required.

- B. Paragraph 3 in Section N4.02 of the ESG QA Manual states, in part, "QA Engineering shall provide the instructions to the receiving/source inspectors or representatives in advance of their need and shall retain a file copy of each instruction until the specified quality verification actions are completed."

In addition, paragraph 3.2(b) of Section N4.00 of the ESG QA Manual states, in part, "Appropriate notations in the 'Inspection by QA' block of the requisition showing whether QA verification is required, whether at source or receipt, and the QA reviewer's signature or stamp and date . . . ."

Contrary to the above: (1) Quality Engineering did not retain file copies of the two safety related wire purchase orders which contained instructions for receiving/source inspectors or representatives; and (2) the "Inspection by QA" block had been improperly signed for the designated QA Engineer by another individual.