NOTICE OF NONCONFORMANCE

MMP Quality Inspections, Inc.
Signal Hill, California

Docket No.07100688

Based on results of the U.S. Nuclear Regulatory Commission inspection conducted on February 7, 1994, it appears that certain of your activities were not conducted in accordance with NRC requirements (refer to Inspection Report No. 94202).

A. 10 CFR § 71.105, "Quality assurance program." This section requires the licensee to provide for indoctrination and training of personnel performing activities affecting quality, as necessary to assure that suitable proficiency is achieved and maintained.

Contrary to the above, MMP's training records showed that refresher training for one radiographer was past due.

B. 10 CFR § 71.111, "Instructions, procedures, and drawings." This section requires the licensee to prescribe activities affecting quality by documented instructions, procedures, or drawings and requires that these instructions, procedures, and drawings be followed.

Contrary to the above, the inspection team identified instances where procedures were not followed.

1. The Level II Inspectors and Visual Inspectors Certification Program requires an annual visual acuity test to be performed. The visual acuity certifications for three inspectors were due in December 1993.

2. Procedure MMP-RT-OEP-001, Paragraph 10.2.2 states that permanent storage areas be surveyed at three-month intervals; however, the survey records showed that the storage area was last surveyed at an eight-month interval instead.

3. Procedure No. MMP-RT-OEP-001, Paragraph 3.1 states that initial training for radiographers shall include a minimum of 520 hours of documented on-the-job training. However, this requirement was inadequately documented and, therefore, could not be verified.

C. 10 CFR § 71.113, "Document control." This section requires the licensee to establish measures to control the issuance of documents such as instructions, procedures, and drawings, including changes, which prescribe all activities affecting quality.

Contrary to the above, the inspection team found instances where the implementation of this requirement was inadequate.

1. Two of MMP's Radiation Survey Reports (MMP-RT-006), which were initiated on 10/15/93, and 10/14/93, were not dated by the radiographer, as required, when the activity was completed.

2. Procedure No. RT-OEP-1.6, "Radiation Safety and Control Program Radioactive Materials - Sealed Sources Leak Test Procedure," indicated that the cover sheet was signed by the Radiation Safety Director on 8/26/93, however, the remaining pages in the procedure were dated 1/31/91.

3. The Radiation Safety Training Manual showed missing or incomplete document control information as follows: Part I had no revision or approval block; Parts II through V did not have approval signatures and revision dates.

D. 10 CFR § 71.125, "Control of measuring and test equipment." This section requires the licensee to establish measures to assure that tools, gages, instruments, and other measuring and testing devices used in activities affecting quality are properly controlled, calibrated, and adjusted at specific times, to maintain accuracy within necessary limits.

Contrary to the above, the inspection team identified instances where control of measuring and test equipment was inadequate.

1. Numerous measuring equipment was found to be past due for calibration.

2. MMP's Receiving Inspection Reports did not show serial numbers of survey meters that had been receipt inspected. Subsequently, the inspection status of individual pieces of equipment could not be verified, and traceability to their calibration record was not maintained.

E. 10 CFR § 71.137, "Audits." This section requires the licensee to carry out a comprehensive system of planned and periodic audits to verify compliance with all aspects of the QA program, to determine effectiveness of the program, including follow-up actions as required.

Contrary to the above, MMP's audit records showed an open item (No.4) that remained unaddressed on their Satellite Office Auditing Policy Checklist, dated 12/6/93.

Please provide a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555, with a copy to Robert L. Baer, Chief, Source Containment and Devices Branch, Division of Industrial and Medical Nuclear Safety, Office of Nuclear Material Safety and Safeguards (NMSS), within 30 days of the date of the letter transmitting this Notice of Nonconformance. This reply should be clearly marked as a "Reply to a Notice of Nonconformance" and should include, for each Nonconformance: (1) a description of steps that have been or will be taken to

correct these items; (2) a description of steps that have been or will be taken to prevent recurrence; (3) the dates your corrective actions and preventive measures were or will be completed.

FOR THE NUCLEAR REGULATORY COMMISSION

Robert L. Baer

Robert L. Baer, Chief
Source Containment and Devices Branch
Division of Industrial and Medical
Nuclear Safety, MNSS

Dated at Rockville, Maryland
This 11th day of April, 1994