

NOTICE OF NONCONFORMANCE

Westex Company
Oxnard, California

Docket No. 07100765

Based on results of the Nuclear Regulatory Commission inspection conducted on February 9, 1994, it appears that certain of your activities were not conducted in accordance with NRC requirements (refer to Inspection Report No. 94203).

- A. 10 CFR § 71.111, "Instructions, procedures, and drawings." This section requires the licensee to prescribe activities affecting quality by documented instruction, 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. Paragraph 7.1.1 of the Westex Quality Assurance (QA) Program states that each completed Radioactive Material Transfer Log will be reviewed by the Radiation Safety Officer (RSO), or his designee. The Radioactive Material Transfer Logs inspected, showed no evidence of an independent review. The Radioactive Material Transfer Log form did not indicate who performed the radioactive material transfer, nor did it provide for the RSO's review or signature.
2. Paragraph 5.2 of the Westex QA Program requires that container leakage tests be performed and documented on a "Radioactive Material Transfer Log" sheet for each transfer of radioactive material. Source Serial No. 7311 was transferred from packaging Model No. 660, Serial No. 2853, to storage container Serial No. 1110 on May 13, 1993. The same source was then transferred from storage container Serial No. 1110 to packaging Model No. 660, Serial No. 2852 on May 14, 1994. Evidence that the required leak tests were performed in both radioactive material transfers was not available to the inspection team.

- B. 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 and to determine the effectiveness of the program.

Contrary to the above, the inspection team identified instances where Westex's internal audits were not performed in accordance with its QA Program as follows:

1. Paragraph 7.1.3 states that management will perform periodic audits of the RSO for compliance with the program's procedures. No evidence was found to show that management performed the required periodic audits of the RSO during 1993.
2. Paragraph 7.2 states that audits of the entire QA program shall be performed at an interval not to exceed a one-year period. There was no evidence of an internal audit for the year 1993.

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; and (3) the dates your corrective actions and preventive measures were or will be completed.

FOR THE NUCLEAR REGULATORY COMMISSION



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

Dated at Rockville, Maryland
This 14th day of April, 1994