

APPENDIX A

Anchor/Darling Enterprises, Incorporated
Docket No. 99901115/90-01

NOTICE OF NONCONFORMANCE

Based on the results of an NRC inspection conducted on September 17 through September 20, 1990 at the Laconia, New Hampshire facility of Anchor/Darling Enterprises, Incorporated (A/DE), it appears that certain activities were not conducted in accordance with NRC requirements.

1. Criterion XVIII of Appendix B to 10 CFR Part 50, "Audits," states, in part: "A comprehensive system of planned and periodic audits shall be carried out to verify compliance with all aspects of the quality assurance program and to determine the effectiveness of the program... Audit results shall be documented... Followup action, including reaudit of deficient areas, shall be taken where indicated."

Contrary to the above, Section 5.5.1, "Subcontracted Services and Material," of A/DE Quality Assurance Manual (QAM) (10 CFR 50, Appendix B, ANSI N45.2) Revision 1, dated February 6, 1990, does not require program implementation audits or alternate measures for verifying that suppliers of safety-related material holding Quality Systems Certificates issued by the ASME are effectively implementing the approved QA programs.

2. Criterion III of Appendix B to 10 CFR Part 50, "Design Control," states, in part, that where a test program is used to verify the adequacy of a specific design feature, a prototype unit shall be qualification tested under the most adverse design conditions.

Article NCA-3551.2, "Load Capacity Data Sheet (LCDS)," of Subsection NCA to the 1980 Edition of Section III to the ASME code states, in part, that the LCDS is the design document to be used when the component support is designed using the load rating method.

Article NF-3261, "Procedure for Load Rating," of Subsection NF to the 1980 Edition of Section III to the ASME Code states, in part, that the procedure for load rating shall consist of imposing a total load on one or more duplicate, full size samples of a component support.

Contrary to the above, A/DE was unable to provide to the NRC inspectors documentation to support qualification, by load rating, of the Model AD-12500 mechanical snubber which is certified to the 1980 Edition of the ASME Code. Additionally, A/DE was also unable to provide documentation to support spring rate data for their entire mechanical shock suppressor product line as published in their catalog.

3. Criterion XVII of Appendix B to 10 CFR Part 50, "Quality Assurance Records," states, in part, that sufficient records be maintained to furnish evidence of activities affecting quality. Such records shall include data such as qualifications of personnel, procedures, and equipment.

Section 9.1 of A/DE Product Specification No. EN-DS-01, "Documentation," states, "See Anchor/Darling Procedure MST5-0001, "Mechanical Snubber Development Program, "Paragraph 9.0 for requirements". Section 9.2.4 requires a "calibration records reference for all instrumentation used".

Contrary to the above, A/DE could not produce calibration records for equipment used to qualification test the AD-5500 and AD-12500 model mechanical snubber during the July 1981 and January 1982 test periods. Calibration records reviewed dated back only to February 1982. Additionally, A/DE could not produce documentation to verify the basis of acceptance charts used to verify snubber operability in the field using in-place testing methods.

Dated at Rockville, Maryland
this 14th day of February, 1991