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Department of Engineering Mechanics October 6, 1982

Uldis Potapovs, Chief, Vendor Program Branch United States Nuclear Regulatory Commission Region IV 611 Ryan Plaza Drive, Suite 1000 Arlington, Texas 76011

Refer nce: Your Letter of October 4, 1982 (Docket No. 99900909/82-03)

Dear Sir:

With regard to your above referenced letter, we have now had two NRC inspectors on site witnessing testing, Mr. Al Smith and Mr. George Hubbard. In accordance with our normal procedures for QA and technical people who are present on our site to witness nuclear related testing, we have asked these gentlemen to initial the laboratory data sheets, which are the records of the testing they witnessed and which they had reviewed. The purpose of this is to make our records complete as to what testing was actually witnessed by what individuals. I'm sure you can appreciate the fact that we often have witnesses here for our nuclear test activities from A&E firms, vendors, QA consulting firms, in-house QA and others, as well as the NRC. We consider initialing of our laboratory data sheets by these witnesses as a business-like procedure which is in line with the type of quality assurance policies encouraged and enforced by the Nuclear Regulatory Commission. We are therefore at a loss to understand why the inspectors listed above, in particular, have refused to initial the data sheets for the testing which they witnessed.

The matter of initialing data sheets was discussed in our meeting with Mr. H. Shannon Phillips, Mr. George Hubbard and Mr. Al Smith of 7-6-82 at SwRI. We were informed at the time that they would investigate this matter and respond. I would like to point out that this was three months ago; and apparently, there is still no resolution of the matter. I wonder if you could advise of who I should contact to obtain a rapid response on this question of the good deal of data has already been taken on this program to the still with the program is such that our portion

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of the testing here at SwRI may well conclude before this matter is resolved. I would like to point out that the procedure of witnesses initialing laboratory data sheets is a standard practice for Government officials involved in the inspection of military standard testing. We are at a loss to understand why this matter should be a difficulty with the NRC. If it is undesirable for NRC inspectors to initial our data sheet are we to understand that it is the view of NRC that it is undesirable for anybody to initial our data sheets? In other words, is our QA policy at fault in this respect?

Please let me know as soon as possible how we may resolve this matter. I appreciate your kind attention.

Sincerely yours,

Roger L. Bessey Group Leader