

Enclosure

Anchor/Darling Valve Company
Williamsport, Pennsylvania

APPENDIX A

NOTICE OF NONCONFORMANCE

During an inspection conducted at the Williamsport, Pennsylvania facility of Anchor/Darling Valve Company (A/DV) on November 13-16, 1990, the implementation of the A/DV quality assurance (QA) program was reviewed. The results of the inspection revealed that certain activities were not conducted in accordance with NRC requirements. These items are set forth below and have been classified as a nonconformance to the requirements of 10 CFR Part 50, Appendix B, imposed on A/DV by contract, and the A/DV Quality Assurance Manual.

- I. 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; the A/DV QA program does not require program implementation audits or alternate measures for verifying that safety-related suppliers holding Quality Systems Certificates (material) are effectively implementing their approved QA programs.

- II. Criterion III, "Design Control," of 10 CFR Part 50, Appendix B, requires, in part, that measures be established for the selection and review for suitability of application of materials, parts, equipment and processes that are essential to the safety-related functions of the structures, systems and components.

Contrary to the above, A/DV failed to adequately review for suitability commercial-grade items (CGIs) used in safety-related applications.

Specifically, A/DV's dedication is based primarily on a sampling basis which is inadequate to assure that the remaining items are similar to the item selected for dedication and suitable for their intended application. The following examples were identified during the inspection:

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- a. Resilient seats used in several 4-inch, 1,535 pound Tilting Disc Check Valves supplied to Carolina Power and Light under Purchase Order (PO) No. 693153AN for the Harris Nuclear Plant.
- b. Barksdale pressure switches used in several 20-inch, 900 pound, Double Disk Gate Valves supplied to Florida Power and Light Company under PO No. C90930-91310 for the St. Lucie Nuclear Plant.

in both examples, A/DV dedicated only one item and extended the results of such dedication to the remaining items procured without assuring that the item sampled was representative of the procurement lot. This method does not assure that CGIs, procured for use in safety-related applications from commercial suppliers, are suitable for their intended application. Such suppliers may not control manufacturing lot traceability or document changes in design, material and manufacturing.

The sampling method employed by A/DV appears to have contributed to the problem in which several licensees received actuator rebuild kits for Feedwater and Main Steam Isolation Valves which contained o-rings of incorrect material (Buna-N instead of Viton). This resulted in A/DV issuing a 10 CFR Part 21 report to the NRC on January 30, 1990.

Dated in Rockville, Maryland
this _____ day of _____, 1991