

NOTICE OF NONCONFORMANCE

Westronics
Kingwood, Texas

Docket No.: 99901273/94-01

Based on the results of an inspection conducted on May 2-6, 1994, it appears that certain of your activities were not conducted in accordance with NRC requirements as described below.

- A. Criterion XVIII, "Audits," of Appendix B to 10 CFR Part 50 requires, in part, that 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.

Westronics's Quality Procedure (QP) No. 0801, "Audit Procedure," Revision 0, dated December 15, 1990, states that a systematic schedule of audits both internal and external will be established. QP 0801 further states that the audit schedule will be developed and retained by Quality Assurance personnel.

Contrary to the above, Westronics had not established and maintained a systematic schedule of audits to verify compliance with all aspects of its quality assurance program and to determine the effectiveness of the program (99901273/94-01-01).

- B. Criterion XVI, "Corrective Action," of Appendix B to 10 CFR Part 50 requires, in part, that measures shall be established to assure that conditions adverse to quality are promptly identified and corrected.

Section 16.0, "Corrective Action," Revision 5, dated September 1, 1993, of Westronics's Controlled Quality Assurance Program Manual (QAPM), states that measures shall be established to assure the adequacy and effectiveness of corrective action. The section further states that serious or repetitive conditions adverse to quality are corrected promptly, including steps to preclude repetition.

Contrary to the above, Westronics had initiated 24 corrective action requests (CARs) during an internal audit in July, 1993. Eight of these CARs remained unresolved at the time of this inspection which was over nine months later (99901273/94-01-02).

- C. Criterion III, "Design Control," of Appendix B to 10 CFR Part 50 requires, in part, that design control measures shall be established to provide for verifying the adequacy of design, such as by the performance of a suitable testing program. These measures shall include provisions to assure that appropriate quality standards are specified. Where a test program is used in lieu of other verifying processes, it shall include suitable qualification testing of a prototype unit under the most adverse design conditions.

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Section 3.0, "Design Control," Revision 5, dated September 1, 1993, of the Westronics Controlled QAPM, states that the Director of New Product Engineering and Marketing is responsible for assuring that, if designs are verified by test programs, such programs must include suitable qualification of a representative item.

Quality Procedure 0901, "Certificate of Compliance Guidelines," Revision 0, dated December 15, 1990, states that the certificate of compliance will state which quality assurance program the product was produced under and identify the qualification the instrument was produced under, noting the qualification report number.

Contrary to the above, the NRC inspectors found that recorder type 2100C serial number 1682 was shipped to the Niagara Mohawk Power Corporation (NMPC) with a Certification of Compliance dated June 26, 1992, which stated that the item was supplied under the Westronics Controlled Quality Assurance Program, and that Southwest Research Institute (SwRI) Report No. 04-3789-116-RPT1 applied for qualification to IEEE-344-1975, "IEEE Recommended Practices for Seismic Qualification of Class 1E Equipment for Nuclear Power Generating Stations." NMPC Purchase Order No. 96433 dated April 7, 1992, invoked 10 CFR Part 21 and the Westronics Controlled QAPM. However, the requirements of Appendix B to 10 CFR Part 50 were not invoked for the testing performed by SwRI, nor was a review done by Westronics to assure that Appendix B controls were in place during the qualification testing (99901273/94-01-03).

Please provide a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555, with a copy to the Chief, Vendor Inspection Branch, Division of Reactor Inspection and Licensee Performance, Office of Nuclear Reactor Regulation, 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.

Dated at Rockville, Maryland
this 31st day of May 1994.