

APPENDIX B

Limitorque Corporation
Docket No. 99900904/82-02

NOTICE OF NONCONFORMANCE

Based on the results of an NRC inspection conducted on November 30-December 3, 1982, it appears that certain of your activities were not conducted in accordance with NRC requirements as indicated below:

- A. Criterion II of Appendix B to 10 CFR Part 50 states, in part, ". . . shall establish . . . a quality assurance program which complies with the requirements of this appendix The quality assurance program shall provide control over activities affecting the quality of the identified structures, systems, and components, to an extent consistent with their importance to safety"

Contrary to the above, the established quality assurance program as defined by the Nuclear Qualification Facility Quality Assurance Manual (QAM), issued February 28, 1982, Revision 1, did not comply with Appendix B to 10 CFR Part 50 in regard to providing necessary controls over applicable activities as evidenced by the following examples:

1. The QA program did not address the indoctrination and training of personnel performing test activities in accordance with Criteria II and XVIII. No procedures have been written to provide for training of test personnel or qualification of auditors.
2. The QA program did not establish measures, in accordance with Criterion IV, to assure that design bases such as seismic test conditions were included or referenced in documents for procurement. It was noted that purchase order No. 065408 for seismic testing did not identify the applicable frequencies, durations, axes, etc., that were included in the test plan.
3. The QA program did not establish measures, in accordance with Criterion IV, to assure that purchase orders are reviewed and approved for adequacy prior to release. Purchase orders for seismic and irradiation testing had not been reviewed and approved for adequacy.
4. The QA program did not establish measures, in accordance with Criterion VII, to include provisions for the furnishing of objective evidence of quality for testing services and for evaluation of the adequacy of calibration services. The purchase order issued for seismic testing did not require furnishing of test reports by the vendor. Calibration services were provided by a vendor who was listed in the approved vendor list; however, no criteria had been established (e.g., source survey, historical evaluation, or other) with respect to the basis for inclusion in this list.

5. The QA program did not establish measures, in accordance with Criterion VIII, for the identification and control of parts and components to assure that identification is maintained by part number, serial number, or other identifiers. It was noted that one motor installed on test actuator Serial No. 342835 did not have a unique identification number.
6. The QA program did not require, in accordance with Criterion XVI, that the cause be determined if significant conditions adverse to quality were identified and that corrective action be taken to preclude repetition.

- B. Criterion V of Appendix B to 10 CFR Part 50 states, in part, "Activities affecting quality . . . shall be accomplished in accordance with . . . instructions, procedures, or drawings"

Limatorque IEEE Std 382 PWR Qualification Test Plan, Project 681063, Revision 3 (written to implement IEEE Std 382), Section 3.1.2 states, in part, "Purchase order documentation: The following information will be presented to the vendor prior to delivery of test sample(s): A complete description of the services required"

Contrary to the above, Limatorque purchase order No. 063274 dated June 29, 1982, issued to the subcontractor for irradiation services, did not describe the test plan requirements or the applicability of Section 5.5.6 of IEEE Std 382 requirements in regard to air equivalent dose.

- C. Criterion V of Appendix B to 10 CFR Part 50 states, in part, "Activities affecting quality . . . shall be accomplished in accordance with . . . instructions, procedures, or drawings"

Limatorque IEEE 382 PWR Qualification Test Plan, Project 681063, Revision 3, Section 5.1.7 states, in part, "Auditable file: Include all summary sheets, raw data and other pertinent data accumulated during the thermal and mechanical aging in the file section marked Mechanical and Thermal Aging."

Contrary to the above, Limatorque did not maintain an auditable file to include summary sheets, raw data, and pertinent data accumulated during the thermal aging of a replacement limit switch to valve actuator No. 342836, which was undergoing testing on June 25, 1982.

- D. Criterion V of Appendix B to 10 CFR Part 50 states, in part, "Activities affecting quality . . . shall be accomplished in accordance with . . . instructions, procedures, or drawings"

Paragraph C.3 in Section II of the QAM states in regard to irradiation and seismic services, "Purchase orders for both of these services are to invoke the requirement for QA per 10 CFR 50 Appendix B as applicable."

Contrary to the above, purchase orders for irradiation services (No. 063274) and seismic testing (No. 065408) did not invoke applicable 10 CFR Part 50, Appendix B criteria.

- E. Criterion V of Appendix B to 10 CFR Part 50 states, in part, "Activities affecting quality . . . shall be accomplished in accordance with . . . instructions, procedures, or drawings"

Section VII, paragraph B.2, of the QAM states, in part, "In the event deviations are noted the Assistant Chief Test Engineer, Vice President of Engineering and Special Projects Engineer will discuss the deviation to determine what effect, if any, the deviation would have on the qualification. At the conclusion of the meeting, a memorandum to all concerned will be written" Section VII, paragraph C.3, states the same in terms of anomalies.

Contrary to the above, required memoranda had not been written in regard to the several deviations/anomalies which were noted in the test logs for actuator Serial No. 342835. Recorded examples of deviations/anomalies included broken gear teeth, motor failures, as received motor shaft damage, thermal aging, oven failure, and duplication of thermal aging cycles. Review of test logs for actuator Serial No. 342836 also identified deviations/anomalies for which memoranda were not issued.