

ORGANIZATION: LIMITORQUE CORPORATION  
LYNCHBURG, VIRGINIA

REPORT NO.: 99900904/82-02	INSPECTION DATE(S) 11/30-12/8/82	INSPECTION ON-SITE HOURS: 78
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CORRESPONDENCE ADDRESS: Limitorque Corporation  
ATTN: Mr. T. Mignogna  
President  
5114 Woodall Road  
Lynchburg, VA 24506

ORGANIZATIONAL CONTACT: Mr. J. B. Drab, Special Projects Engineer  
TELEPHONE NUMBER: (804) 528-4400

PRINCIPAL PRODUCT: Electric motor operated valve actuator assemblies.

NUCLEAR INDUSTRY ACTIVITY: Limitorque Corporation supplies safety-related electric motor operated valve actuator assemblies for valve operation to the nuclear industry. This represents approximately 5 percent of their total production.

ASSIGNED INSPECTOR: A. R. Johnson 2/18/83  
A. R. Johnson, Equipment Qualification Section (EQS) Date

OTHER INSPECTOR(S): W. M. McNeill, Reactive and Component Program Section  
L. D. Bustard, NRC Consultant (Sandia National Laboratories)

APPROVED BY: H. S. Phillips 2/18/83  
H. S. Phillips, Chief, EQS Date

INSPECTION BASES AND SCOPE:

- A. BASES: 10 CFR Part 50, Appendix B and 10 CFR Part 21.
- B. SCOPE: The purpose of the inspection was: (1) to review the Limitorque Nuclear Qualification Facility Quality Assurance Manual (QAM) and supplemental procedures, and (2) to verify the implementation of the QA program. All of the 10 CFR Part 50, Appendix B criteria were inspected except control of special processes.

PLANT SITE APPLICABILITY:

Not identified.

DESIGNATED ORIGINAL  
Certified By Rheanne Clark

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A. VIOLATIONS:

Contrary to the requirements of Section 21.31 of 10 CFR Part 21, Limitorque failed to assure that purchase orders issued to Isomedix (No. 065294 for irradiation services) and Acton Environmental Testing (No. 065408 for seismic testing) specified that the provisions of 10 CFR Part 21 were applicable.

B. NONCONFORMANCES:

1. Contrary to Criterion II of Appendix B to 10 CFR Part 50, the established quality assurance program as defined by the Nuclear Qualification Facility QAM 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:
  - a. 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 nor qualification of auditors.
  - b. 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.
  - c. 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.
  - d. 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.

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<p>e. 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 additionally noted that one motor installed on test actuator Serial No. 342835 did not have a unique identification number.</p> <p>f. 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.</p> <p>2. Contrary to Criterion V of Appendix B to 10 CFR Part 50 and Section 3.1.2 of IEEE 382 PWR Qualification Test Plan, Project 681063, Revision 3, Limitorque 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.</p> <p>3. Contrary to Criterion V of Appendix B to 10 CFR Part 50 and Section 5.1.7 of IEEE 382 PWR Qualification Test Plan, Project 681063, Revision 3, Limitorque 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.</p> <p>4. Contrary to Criterion V of Appendix B to 10 CFR Part 50 and Section II, paragraph C.3 of the QAM, purchase orders for irradiation services (No. 063274) and seismic testing (No. 065408) did not invoke applicable 10 CFR Part 50, Appendix B criteria.</p> <p>5. Contrary to Criterion V of Appendix B to 10 CFR Part 50 and Section VII, paragraphs B.2 and C.3 of the QAM, 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.</p>		

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C. UNRESOLVED ITEMS:

None

D. STATUS OF PREVIOUS INSPECTION FINDINGS:

1. (Closed) Open Item (82-01): Limatorque reviewed the evaluation documented in Reliance Electric Corporation report of September 7, 1982, regarding LOCA/HELB qualification test failure of a Limatorque valve actuator assembly on August 23, 1982, and on a retest on September 14, 1982.

The NRC inspector reviewed a report issued by Limatorque during this inspection. Memorandum to C. M. Cox from J. B. Drab, dated October 1, 1982, entitled "Disposition of Anomaly - Class LR Motors" concluded the following: Limatorque concluded that the integrity of the epoxy/resin system was impaired during the thermal/radiation aging. Arcing occurred during exposure to moist environment. Limatorque will require the motor manufacturer to modify the coil head structure to assure that the insulation integrity is retained.

2. (Closed) Open Item (82-01): The Limatorque evaluation of a limit switch malfunction during a LOCA/HELB environmental qualification test on August 23, 1982, indicated a momentary false indication that the actuator had reached the full open position. The switch malfunction was caused by the loose bolting of the drive cartridge. The Limatorque disposition of this anomaly was that this occurrence was an isolated random failure.

The NRC inspector reviewed a report issued by Limatorque during this inspection. Memorandum to C. M. Cox from J. B. Drab, dated October 20, 1982, entitled "Disposition of Anomaly - Analysis, Limit Switch Anomaly (Random Occurrence) #681063" concluded the following: Two fasteners in the limit switch cartridge were loose permitting the cartridge to shift causing improper gear mesh. It was concluded by Limatorque that the cartridge became loose during handling and/or shipment that occurred between the aging test steps and/or during the accelerated plant vibration testing (in excess of 100 hz). The Limatorque evaluation further concluded that either the excessive handling/shipping (by others) or extreme simulated mechanical wear prestressing testing requirements, or both, created this random problem.

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3. (Closed) Open Item (82-01): The Limitorque QAM was examined by the NRC inspector; however, an indepth review was to be accomplished during a future NRC inspection.

The QAM review was performed during this inspection.

E. OTHER FINDINGS OR COMMENTS:

1. QA Manual Review: The Limitorque Corporation Nuclear Qualification Facility QAM, issued February 28, 1982, Revision 1, did not fully establish the quality assurance program for environmental qualification testing of safety-related electrical equipment at the Lynchburg, Virginia, facility (refer to paragraph B.1 of this report for nonconformances). The QAM addressed 17 applicable criterion, out of a total of 18 (Criterion IX, "Control of Special Processes," was not applicable), to meet the requirements of 10 CFR Part 50, Appendix B. The NRC inspection team reviewed the entire QAM, including the Nuclear Qualification Facility Internal Audit Procedure (dated February 26, 1982); IEEE 382 PWR Qualification Test Plan, Project No. 681063 (Revision 4); and Qualification Test Procedure, IEEE 382-80 Test Parameters, Project No. 681063 (Revision 4).
2. QA Program Implementation Review: The NRC inspection team performed an inspection of the Limitorque QA program implementation of 17 out of 18 applicable criteria of 10 CFR Part 50, Appendix B. During the inspection, 62 documents (listed in Appendix D to this report) were examined by the NRC inspection team.
  - a. The NRC inspectors evaluated the QA program implementation and determined the following:
    - (1) Organization: Organizational structures were reviewed, including functional responsibilities and authorities. Lines of communication with authority and organizational freedom of the QA administrator and special projects engineer existed. Both reported directly to the executive vice president.
    - (2) QA Program: The established quality assurance program did not provide the necessary controls over applicable activities (see B.1.a above). Indoctrination and training of test personnel were given by the chief test engineer. Auditor training had not begun.

- (3) Design Control: Documented test results as documented were being evaluated by the responsible design organization (Limitorque Corporation, Manufacturing Facility Engineering) to assure that test requirements and design interfaces for Limitorque's prospective customers have been met.
- (4) Procurement Document Control: The QAM failed to address how technical and regulatory requirements are included in purchase orders (see A and B.1.b above). It was also noted that these purchase orders were not subject to a QA review and approval (see B.1.c above).

The two recent purchase orders and requisitions for irradiation services (RD-521/063274) and seismic services (RD-547/065408) were reviewed. Appendix B was identified as a requirement that should have been invoked in purchase orders issued to these sub-suppliers of test services; however, the purchase orders reviewed did not invoke Appendix B (see B.4 above).

Limitorque does have on file a memo from the irradiation test sub-supplier certifying its implementation of Appendix B. A similar certification was being requested from the seismic sub-supplier for test services. To date, there have been no changes to these previously referenced purchase orders.

- (5) Instructions, Procedures, and Drawings: The measures established in the QAM identified that the test plan and test procedures are the documents to control activities in equipment qualification. The test plan and test procedure for a current qualification effort project 681063 were reviewed. Although the QAM did not require plans and procedures to have the prerequisites for a given test, the instrumentation to be used, provisions for data acquisition, acceptance limits, and other test information were addressed in the Limitorque test plans and procedures.

The QAM did establish that the Vice President of Engineering and the Special Projects Engineer were to review and approve test plans and procedures. The implementation of the test plan and procedures was inspected by a review of the test documentation. It was observed that test documentation had a number of areas where "white out" had been used and

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authorization for changes to documentation became unclear. It was also observed that limits and parameters were often stated as absolute values (e.g., 300 hours) rather than tolerances (300  $\pm$  3 hours, 300 hours max). Test documentation identified the insulation of the test actuator on the bill of material to a different type than that used:

- (6) Document Control: Plans, procedures, and changes were found to be reviewed and approved by the Vice President of Engineering and the Special Project Engineer as required by the QAM. The control of current documents was verified by review of the test logs because no testing was in progress.
- (7) Control of Purchased Material, Equipment, and Services: The major procurement is for irradiation and seismic services. Materials, namely grease, and other services, namely calibration, used for equipment qualification testing are obtained from the Limatorque manufacturing facility as are the test actuators.

Limatorque controls the suppliers by performing inspections at the suppliers. Test plans require the supplier of test services to issue a report of their test activities and a certification of compliance to the purchase order requirements. The required inspection by Limatorque and required documentation were not identified in purchase orders. The QAM requires the use of approved vendors and an Approved Vendors List. This list was the basis for supplier selection. The QAM did not address the method of source evaluation used to generate the Approved Vendors List (see B.1.d above).

- (8) Identification and Control of Materials, Parts, and Components: The QAM did not address identification of parts and components to be used in testing (see B.1.e above). The test plan and procedure did identify a particular bill of materials to be used. Traceability was not established for certain items such as motors, limit switches, and gears. A number of motors, switches, and gears were used and replaced during the testing. It was observed that because of the lack of unique identification and sparse documentation, it could not always be established which motor, switch, or gear was in use or replaced at a particular time.

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	<p>(9) <u>Control of Special Processes</u>: Limitorque does not perform welding, heat treating, or nondestructive examination on prototype test actuator assemblies. This criteria is not applicable.</p> <p>(10) <u>Inspection</u>: The QAM defined the role of QC/QA as a review of the final test report and to perform internal auditing. The daily or otherwise surveillance of test activities was not a QC/QA function, but was to be performed by the special projects engineer. There was limited documentation of this activity by the special projects engineer.</p> <p>(11) <u>Test Control</u>: Test results were adequately documented and evaluated to assure that test requirements had been satisfied. Data sheets, raw data, and data logging printouts were controlled and reduced to meaningful results and retained in the QA record file for preparation of final test reports. Written test plans and procedures governed the test activity; however, Limitorque purchase order No. 063274 issued to a subcontractor did not describe the test plan requirements or the applicability of Section 5.5.6 of IEEE 382 requirements in regard to air equivalent dose (see B.2 above).</p> <p>(12) <u>Control of Measuring and Test Equipment</u>: The QAM did address calibration controls. Calibration was performed by an outside laboratory. Internal controls, including calibration tags, schedules, and NBS traceability were found to be implemented. The records of seven instruments used during testing were reviewed. On one occasion, it was documented that a load cell was overdue for calibration but was used on a "risk" basis. The subsequent calibration found that no adjustments were necessary. The QAM does not address what is to be done when subsequent calibration identifies instrumentation that is out of tolerance and requires adjustment; e.g., review of measurements made with the instrumentation in question since the last acceptable calibration.</p> <p>(13) <u>Handling, Storage, and Shipping</u>: Limitorque's handling and storage of test items complied with their written procedures addressed in the QAM. The responsibility of shipment to suppliers for test services was handled by the Limitorque Manufacturing Facility Shipping Department supervisor in accordance with the Limitorque Manufacturing QAM (not audited by the NRC inspection team during this inspection).</p>	



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(14) Inspection, Test, and Operating Status: The test status for each test item (valve actuator assembly) was appropriately identified by traveler, invoice, approved bill of material, and associated manufacturing QC documentation. A memorandum, initiated by the Nuclear Qualification Facility, was ordered to a proper bill of material from the Limitorque manufacturing facility. The test unit was then fabricated and assembled by the Limitorque manufacturing facility to the requirements of the Limitorque Manufacturing QAM (not audited by the NRC inspection team during this inspection).

(15) Nonconforming Materials, Parts, or Components: The QAM establishes that nonconformances are to be identified as deviations or anomalies. There was no distinction between deviations and anomalies. The QAM also establishes that when deviations or anomalies are identified, a memorandum of understanding is written on the disposition of the problem. The QAM was not clear as to what was to be done when a departure from the test process occurred or when test equipment failed or parts and components were found outside of specification/drawing requirements.

No provisions for tagging and segregation of nonconforming parts were implemented.

A number of test deviations/anomalies were found to be not documented (see B.5 above).

(16) Corrective Action: Corrective action is defined in the QAM only in terms of internal audit findings. Corrective action is not addressed in the QAM regarding test failures, malfunctions, and anomalies (see B.1.f above).

No corrective action reports, in terms of internal audit findings, were maintained in the QA record file.

(17) Quality Assurance Records: Limitorque did not maintain documented test results nor auditable records, involving the thermal aging of limit switches which had been used as replacement items for a broken switch on an actuator assembly undergoing testing. Discussions with Mr. C. Cox, Assistant Chief Test Engineer, confirmed that the thermal aging data file was not maintained (see B.3 above).

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- (18) Audits: An internal audit procedure was established and was issued in February 1982 as part of the QAM. It stated that auditing will be done annually. The most recent equipment qualification activity began in February 1982 and continued until September 1982. No testing activity has been performed since, and there are no firm plans to resume testing in January 1983 when the annual internal audit is scheduled. No annual internal audit has been performed to date.



DOCUMENTS EXAMINED

1	2	TITLE/SUBJECT	3	4
1	4	QA Manual, Nuclear Qualification Facility. Initial Issue Feb 26, 1982	9/21/82	Rev 1
2	3	Limiting IEEE 382 PWR Qualification Test Plan # 681063	9/2/82	Rev 4
3	3	Qualification Test Procedure SMB-00 Actuator, PWR Inside Containment Qualification, IEEE 382-80, # 681063	9/1/82	Rev 4
4	8	Section 206, Energy Reorganization Act of 1974 Publaw 93-438	10/11/74	NA
5	8	Notice, Code of Federal Regulation 10CFR (Part 21) - Attach A	7/24/81	N/A
6	3	Limiting Std Operating Procedure QCP-22, Reporting Defects	5/1/78	N/A
7	8	10 CFR Part 21 - Reporting of Defects and Noncompliance (46FR 57665)	11/25/81	N/A
8	1	Figure 9, MSLB Test Profile, Project # 680034	None	NA
9	1	Figure 2, Gear Limit Switch Compartment, Contact Ident, Proj 680034	None	NA
10	1	Reactor Mgr IEEE Qual Wiring Diagram - Seismic Test I/C 680034	10/7/80	NA
11	1	Figure 6, Pressurization Set up, Project 680063	None	NA
12	1	Figure 10, HELB Test set-up, Project 680063	None	NA
13	1	Figure 5, Reactor Mgr IEEE Qual Wiring Diagram - general, I/C 680034	10/7/80	NA
14	1	Stem Nuts Specification, Project 681063	2/24/82	NA
15	8	Bill of Mat'l, Torque Switch Nuclear # 11500-010-01, SMB-00	None	NA
16	8	Bill of Mat'l, 4-TR.G.L. Switch Assy # 10120-1-3, SMB-00	6/3/82	NA

## Document Types:

- |                  |                                 |
|------------------|---------------------------------|
| 1. Drawing       | 5. Purchas Order                |
| 2. Specification | 6. Internal Memo                |
| 3. Procedure     | 7. Letter                       |
| 4. QA Manual     | 8. Other (Specify-if necessary) |

## Columns:

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|-----------------------------|
| 1. Sequential Item Number   |
| 2. Type of Document         |
| 3. Date of Document         |
| 4. Revision (If applicable) |

Scope/Module \_\_\_\_\_

DOCUMENTS EXAMINED

1	2	TITLE/SUBJECT	3	4
17	4	Memo to John Goin, Supervisor of Prod Asses from E. Carver	1/28/82	NA
18	8	Bill of Mat'l, Actuator SM9-00, Order No. 681063 #A	12/3/81	NA
19	8	Change Notice #9-5033	6/9/82	NA
20	6	MSLB (Test Anomaly (Motors) Project 681063	10/1/82	NA
21	6	Memo from J.B. Drab to C.M. Cox, Limit Sw Assy Anomaly #681063	10/20/82	NA
22	8	Analysis - limit Switch Anomaly (Random Occurrence) #681063	10/20/82	NA

- Document Types:
1. Drawing
  2. Specification
  3. Procedure
  4. QA Manual

5. Purchas Order
6. Internal Memo
7. Letter
8. Other (Specify-if necessary)

- Columns:
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1	2	TITLE/SUBJECT	3	4
1	6	Letter J.B. Drab to C. Cox, Limit Switch Anomaly Test # 681063	10/20/82	
2	6	" " " # 681063 MSCB test Anomaly (motors)	11/10/82	
3	6	Enclosure to Item #2; Letter from T. Kluk, Balance Co Inspection Report (letter <sup>contents</sup> has been duplicated to remove proprietary information) <sup>discusses</sup> limit torque motor 11	9/24/82	
4	6	Possible enclosure to #2, Letter from T. Kluk, commenting on motor 112-1 (letter <sup>contents</sup> has been duplicated to remove proprietary)	9/3/82	
5	6	Memo J.B. Drab to C.M. Cox, "Project #681063-MSCB test Anomalies"	9/13/82	
6	6	Memo J.B. Drab to C.M. Cox, #681063 MSCB test Anomaly (motors)	10/1/82	
7	6	C. Cox to W. Denkowski; Project 681063 MSCB Environment <del>test</del>	9/21/82	
8	7	C. Cox to W. Denkowski; Project #681063-MSCB Test Anomalies	9/13/82	
9	2	Limit torque IEEE 382 PWR Qualification Test Plan Project #681063	9/14/82	Test 4
10	3	Qualification Test Procedure, SMB-00 Actuator, Project 681063	9/1/82	4
11	7	NRC Docket # 99900904/82-01		Preliminary
12	7	Mailgram to Al Johnson from J.B. Drab	9/17/82	<del>Preliminary</del>
12	7	Mailgram to Al Johnson from J.B. Drab	8/27/82	

Document Types:

- 1. Drawing
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- 5. Purchas Order
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- 8. Other (Specify-if necessary)

Columns:

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1	2	3	4
	TITLE/SUBJECT		
13	80058 - Nuclear Qualification Document	6-29-82	
14	Purchase Order, Limborge to Isomedix RD 521 Cont'd # 063274	8/9/82	
15	Letter David Constantine (Isomedix) to W. Denkowski (Limborge)	9/22/82	Page 3
16	Letter (Laura Tympanich (Isomedix)) to W. Zykes (Limborge)	8/23/82	
17	Limborge IEEE 382 PWR Qualification Test Plan Project # 681063	4/8/74	
18	SEL-9 (Sheet 1 of 2) Limborge Rating Sheet	5/14/82	
19	Reply message from Joe Drab to Chuck Cox/Walt Sykes (Subject was "Containment Qualification - SMB00 O/N 681063")	6-25-82	
20	Reply message from Joe Drab to Chuck Cox	1st page = 8/20/81	
21	Test log for L.P. # 681063 SMB-00-15 382-80 Qnl, Unit # 342835 p11a of p17a R+D Photographic Proofs Log Book #1 (Shows that limit switches were in place during thermal gaging)		
22	Quality Assurance Manual, Nuclear Qualification Facility	2/26/82	
23	Test log for L.P. # 681063 SMB-00-15 382-80 Qnl, # 342836	1st page = 2/13/82	
24	681063 Test Profile including initial gaging to show that events were (Profile is not dated but initial gaging column is start July-date 256)	Completed	

- Document Types:
1. Drawing
  2. Specification
  3. Procedure
  4. QA Manual
- Columns:
1. Sequential Item Number
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  4. Revision (If applicable)
5. Purchase Order  
 6. Internal Memo  
 7. Letter  
 8. Other (Specify-If necessary)





Inspector McNeill  
 Scope/Module Procurement Control

DOCUMENTS EXAMINED

1	2	TITLE/SUBJECT	3	4
4	4	QA Manual Nuclear Qualification Facility	Feb 26, 82	-
681063	8	Limiting IEEE 382 PWR Qualification Test Plan #681063	9/2/82	4
RD-521	7	ISOMEDIX LETTER SUMMARIZE TEST PARAMETERS	Aug 9, 82	-
063214	5	PURCHASE REQUISITION	6-29-82	
	5	PURCHASE ORDER	6-29-82	
RD-547	7	ISOMEDIX LETTER Appendix B USED via QAM of Iso.	9-22-82	
065408	5	PURCHASE REQUISITION	Aug 10, 82	
17710-83	5	PURCHASE ORDER	Aug 31, 82	
17710-1-83	9	SEISMIC TEST REPORT (PRELIMINARY)	8/27/82	
	9	"	9/8/82	
	6	SEISMIC TEST MEMOS	Aug 17 82	
	6	"	Aug 18 82	
	6	"	Sept 282	
RD 509	9	APPROVED VENDORS LIST	July 5 '79	0
		Instructions, Procedures, & Drawings		
681063	3	Qualification Test Procedure	9/1/82	4

- Document Types:
1. Drawing
  2. Specification
  3. Procedure
  4. QA Manual
  5. Purchase Order
  6. Internal Memo
  7. Letter
  8. Other (Specify - if necessary)
  9. Report
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Inspector McNeill

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Scope/Module \_\_\_\_\_

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DOCUMENTS EXAMINED

1	2	TITLE/SUBJECT	3	4
681063	8	Bill of Material FOR ORDER 681063	12/3/81	-
-	9	CALIBRATION/INSTRUMENTATION AGENDA	-	-
	9	QUALIFICATION TEST DATA SHEET		
	9	TEST EQUIPMENT LOG SHEET		
	8	TEST LOG SAM #1 & #2		
	8	CORRESPONDENCE FILE		
	6	AUDIT SCHEDULED	11/10/82	
	6	ANOMALY CORRESPONDENCE FILE		
	9	ANALYTICS CHEM. REPORTS	11/8 & 9/82	-

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- 4. QA Manual
- 5. Purchas Order
- 6. Internal Memo
- 7. Letter
- 8. Other (Specify-If necessary)
- 9. REPORT

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