APPENDIX B

Unibraze Corporation Decket No. 99900793/83-01

NOTICE OF NONCONFORMANCE

Based on the results of an NRC inspection conducted on January 10-14, 1983, it appears that certain of your activities were not conducted in accordance with NRC requirements as indicated below:

Criterion V of Appendix B to 10 CFR Part 50 states, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

Nonconformances with these requirements are as follows:

A. Paragraph 5.3.2 of Section 5.0 of the Identification and Verification Manual (IVM), "Identification, Inspection and Control of Incoming Materials," Revision 2, dated February 26, 1982, states, in part, ". . . each heat and lot of material is given a unique Unibraze control number."

Subparagraph 5.3.2.1 states, "Tagging. Each package or container of the material will be tagged with the control number, material description and weight."

Contrary to the above, a review of documentation and material for three inprocess nuclear contracts revealed that certain reels of wire were not identified with tags containing a control number, material description, and weight for two of the contracts; i.e., three reels from Contract No. N-202 and three reels from Contract No. N-207 which were held, respectively, in the controlled material and nonconforming material hold areas.

B. Paragraph 4.4.2 of Section 4.0 of the IVM, "Control of Purchased Material," Revision 2, dated February 26, 1982, states, in part, "The testing will be accomplished by a vendor . . . who has been surveyed ... and audited by Unibraze."

Contrary to the above, a review of the QA record files revealed that two vendors (Ohio Counting Scales and Eli Whitney Metrology Lab) performing testing services had been neither surveyed nor audited by Unibraze.

C. Paragraph 7.9 of Section 7.0 of the IVM, "Measuring and Test Equipment," Revision 1, dated April 17, 1981, states, in part, "... Purchase orders sent to calibration subcontractors for services will indicate the applicable calibration procedure or standard to be used."

8303280213 830228 PDR 04999 EMV**** 99900793 PDR Contrary to the above, a review of the QA record files revealed that a purchase order had not been sent nor had the applicable calibration procedure or standard to be used been otherwise provided to Ohio Counting Scales who had performed calibrations of weighing scales since 1975.

D. Section QCF-8 of Procedure QCP-12-76-2, "Status Tag Procedures," dated September 30, 1980, states, in part, "The Reject Tag QCF-8 will be attached immediately if the action is to reject. . . The individual responsible for each operation . . . will . . . sign their respective form as the operation is completed."

Contrary to the above, a review of material in the nonconforming material hold area revealed that a reject tag attached to a reel of material for nuclear Contract No. N-207 was not signed by the individual responsible for attaching the tag.

E. Paragraph 12.1.3 of Section 12.0 of the IVM, "Audits," Revision 2, dated February 26, 1982, states, in part, "All audits will be conducted using internal audit procedures. . . ."

Paragraph 12.1.4 states, in part, "An audit report will be distributed to the manager of the area being audited. . . ."

Contrary to the above, a review of internal audit activities for 1981 and 1982 revealed that: (1) an internal audit procedure did not exist, and (2) internal audit reports for 1981 and 1982 were not distributed to the applicable manager(s) of the areas being audited.