

APPENDIX B

National Technical Systems
Testing Division
Docket No. 99900907/83-01

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."

- A. Paragraph 4.3.1.2 of Quality Procedures Manual (QPM), Revision C, dated July 7, 1982, states, in part, "The test technician shall sign and date all data sheets."

Paragraph 4.3.3.5 of QPM, Revision C, dated July 7, 1982, states, in part, "The acceptance blocks of the data sheet shall be completed as follows: Test By - The technician shall sign his name in this space."

Contrary to the above, data sheets on Master Job Order (MJO) No. 548-9247 were not signed by the test technician.

- B. Paragraph 12.5 of QPM, Revision C, dated July 7, 1982, states, in part, "When all necessary corrective action has been accomplished, all the data concerning the audit shall be enclosed in a file folder which shall be identified as to the activities audited and the date of the audit; and shall be retained as a record of a closed-out audit."

Contrary to the above, there was no documented objective evidence in the file folders that corrective action had been accomplished relative to audit deficiencies identified during audits conducted at National Technical Systems (NTS) Saugus, California, and NTS Hartwood, Virginia.

- C. Paragraph 14.4.2 of QPM, Revision C, dated July 7, 1982, states, in part, "The Quality Control Department shall annually review all SOP's [Standard Operating Procedures] to determine their current status and effectiveness."

Contrary to the above, there was no documented objective evidence that the required annual review of all SOP's had been or were being performed.

- D. Element II of the Appendix to QPM, Revision C, dated July 7, 1982, states, in part,

- "1. The Quality Control Department will be responsible for administering competency tests for each job classification in specialized areas before allowing employees to function in the related job capacity, and shall maintain records of test results for all employees.
- "2. The qualifications of personnel will be documented and maintained by the Quality Control Department, and will provide the following information: A) . . . B) . . . C) activities certified to perform."

Contrary to the above:

1. There was no documented objective evidence that the competency tests for each job classification in specialized areas had been administered.
2. There was no documented objective evidence in the qualification of personnel files to indicate that any personnel had been certified to perform in any specialized areas even though employees were working in specialized areas.

- E. Element XI of the Appendix to QPM, Revision C, dated July 7, 1982, states, in part, "Testing programs shall be planned and controlled by utilization of the Job Traveler form . . . except that the requirement in paragraph 2.4.3 for inspection stamp impressions or initials by ' . . . the cognizant Test Engineer and/or the QA Manager . . .' is modified to make it mandatory for the QA Manager to also stamp or initial the Job Traveler form as each test or other operation is properly accomplished."

Contrary to the above, the QA Manager was not stamping or initialing job travelers as each test or other operation was properly accomplished.

- F. Element XVII of the Appendix to QPM, Revision C, dated July 7, 1982, states, in part, "Because test records are considered to be evidence of activities pertaining to quality, they shall be legible, identifiable, and retrievable, . . ."

"Test records include, but are not limited to: a) b) receiving inspection reports."

Contrary to the above, receiving inspection reports were not available for the actuator and multileaf damper being tested in accordance with Test Procedure No. 548-9247-1.

- G. Element XVII of the Appendix to QPM, Revision C, dated July 7, 1982, states, in part, "Test records kept by NTS will be maintained in the contracts office area or in a locked storeroom established for that purpose."

Contrary to the above, test records of closed projects were being maintained in engineering offices and not in locked storerooms as required.