

ORGANIZATION: NATIONAL TECHNICAL SYSTEMS
TESTING DIVISION
SAUGUS, CALIFORNIA

REPORT NO.:	99900907/83-01	INSPECTION DATE(S)	1/10-14/83	INSPECTION ON-SITE HOURS:	68
CORRESPONDENCE ADDRESS: National Technical Systems Testing Division ATTN: Mr. W. L. Traw, Division Vice-President & Facility Manager 20988 W. Golden Triangle Road Saugus, California 91350 ORGANIZATIONAL CONTACT: Mr. B. Ely, Manager, Quality Control TELEPHONE NUMBER: (805) 259-8184					
PRINCIPAL PRODUCT: Equipment Testing NUCLEAR INDUSTRY ACTIVITY: Approximately 15% of the facility capacity and total man-hours are involved in testing of equipment for the nuclear power industry.					
ASSIGNED INSPECTOR:		<u>G. T. Hubbard</u>		<u>March 4, 1983</u>	
		G. T. Hubbard, Equipment Qualification Section (EQS)		Date	
OTHER INSPECTOR(S): A. L. Smith, EQS J. J. Benson, Consultant, Sandia National Laboratories					
APPROVED BY:		<u>H. S. Phillips</u>		<u>March 4, 1983</u>	
		H. S. Phillips, Chief, EQS		Date	
INSPECTION BASES AND SCOPE: A. <u>BASES</u> : 10 CFR Part 50, Appendix B and 10 CFR Part 21. B. <u>SCOPE</u> : The purpose of this inspection was to perform a Quality Assurance (QA) programmatic inspection which included review of National Technical Systems (NTS) QA Manual and verification of the implementation of the QA manual requirements and procedures. The inspection included review of NTS's compliance with 10 CFR Part 21 requirements.					
PLANT SITE APPLICABILITY: Not identified					
				DESIGNATED ORIGINAL Certified By <u>Phianne Clark</u>	

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A. VIOLATIONS:

Contrary to the requirements of Section 21.6 of 10 CFR Part 21, NTS failed to post the current version of 10 CFR Part 21 on their premises.

B. NONCONFORMANCES:

1. Contrary to Criterion V of Appendix B to 10 CFR Part 50 and paragraphs 4.3.2. and 4.3.3.5 of Quality Procedures Manual (QPM), Revision C, dated July 7, 1982, data sheets on Master Job Order (MJO) No. 548-9247 were not signed by the test operator.
2. Contrary to Criterion V of Appendix B to 10 CFR Part 50 and paragraph 12.5 of QPM, Revision C, dated July 7, 1982, NTS had no documented objective evidence in the file folders that corrective action had been accomplished relative to audit deficiencies identified during audits conducted at NTS Saugus, California, and NTS Hartwood, Virginia, facilities.
3. Contrary to Criterion V of Appendix B to 10 CFR Part 50 and paragraph 14.4.2 of QPM, Revision C, dated July 7, 1982, NTS had no documented objective evidence that the required annual review of all Standard Operating Procedures (SOP) had been performed.
4. Contrary to Criterion V of Appendix B to 10 CFR Part 50 and Element II of the Appendix to QPM, Revision C, dated July 7, 1982, there was no documented objective evidence that:
 - a. The competency tests for each job classification in specialized areas had been administered.
 - b. Any personnel had been certified to perform in any specialized areas even though employees were working in specialized areas.
5. Contrary to Criterion V of Appendix B to 10 CFR Part 50 and Element XI of the Appendix to QPM, Revision, C, dated July 7, 1982, the QA Manager was not initialing or stamping the job travelers as required.
6. Contrary to Criterion V of Appendix B to 10 CFR Part 50 and Element XVII of the Appendix to QPM, Revision C, dated July 7, 1982, receiving inspection reports were not available for the actuator and multileaf damper being tested in accordance with Test Procedure No. 548-9247-1.

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7. Contrary to Criterion V of Appendix B to 10 CFR Part 50 and Element XVII of the Appendix to QPM, Revision C, dated July 7, 1982, test records of closed projects were being maintained in engineering offices and not in the locked storeroom as required.

C. UNRESOLVED ITEMS:

None

D. OTHER FINDINGS OR COMMENTS:

1. QA Manual Review: The QA Manual is a quality procedures manual consisting of 14 sections and an appendix that establishes the procedures necessary to comply with the requirements of the 18 criteria of 10 CFR Part 50, Appendix B. The NRC inspector's review of the QPM consisted of an examination of all 14 sections and the complete appendix to the manual.

The NRC inspector did not identify any nonconformances during the manual review.

2. QA Program Implementation: The NRC inspector verified the implementation of the QPM procedures by an examination of representative records and files, by conducting interviews with test personnel, and by visual inspections and observations.

Comments concerning the implementation review as related to the 18 criteria of 10 CFR Part 50, Appendix B are as follows:

- a. Organization: Organizational structures were reviewed including functional responsibilities and authorities. The QA Manager reports directly to the Division Vice-President and Facility Manager and has the authority to stop testing or other work when he feels it is necessary.
- b. Quality Assurance Program: The NRC inspector evaluated this criterion by verifying that a QA program was established by the QPM and by verifying the implementation of the 18 criteria of 10 CFR Part 50, Appendix B. Review of QA training records identified one nonconformance (see paragraph B.4) under this criterion.

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- c. Design Control: Even though NTS does not design components or safety-related items, this criterion is applicable to the extent that applicable customers and NRC design requirements are translated into test plans, procedures, and/or programs. The NRC inspector verified that NTS was following their QPM procedures and was translating design requirements into test plans and procedures as specified by customer purchase orders and related technical specifications.
- d. Procurement Document Control: The NRC inspector verified that NTS was complying with their procedures by review of outgoing purchase orders (PO). The review of PO's verified QA involvement in PO review and that appropriate QA and technical requirements are being called out in PO's.
- e. Instructions, Procedures, and Drawings: The NRC inspector verified implementation of this criterion by review of representative test procedures developed in accordance with the procedures of the QPM. Additional verification was achieved by evaluating the implementation of the other criteria described in procedures of the QPM.
- f. Document Control: Review of job travelers, standard operating procedures, and "Change of Procedure" forms showed that NTS was following their QPM procedures describing document control with one exception (see the nonconformance described in paragraph B.3). Documents reviewed showed that they were approved and released by appropriate authorities and the appropriate documents and revisions were being used at the proper locations.
- g. Control of Purchased Material, Equipment, and Services: The NRC inspector verified the implementation of QPM procedures for the control of purchases. This verification was accomplished by an NRC evaluation of vendor audits, completed vendor quality questionnaire forms, the approved vendor list, vendor corrective action requests, and records showing QA review of incoming purchases.
- h. Identification and Control of Materials, Parts, and Components: The NRC inspector evaluated the NTS method of test item identification for material control by observing and inspecting several test items and appropriate documentation including job travelers and

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test data sheets. The use of red "Hold" tags for items that deviated from specification requirements was not observed since no instances of specification deviation occurred during the inspection.

- i. Control of Special Processes: Since no special processes are performed by the Saugus Division personnel, this criterion is not applicable.
- j. Inspection: The NRC inspector verified that NTS was following their QPM inspection procedures with one exception (see the nonconformance described in paragraph B.1). The inspector verified that engineering and QA were involved in test planning, test performance, data recording, and data analysis by reviewing test data, test reports, and observing actual test operations.
- k. Test Control: The NRC inspector evaluated the NTS implementation of their QPM test control procedures which include obtaining customer approval of test plans and reports and the use of a job traveler which is subject to engineering and QC approval prior to testing. Review of test plans, test reports, and job travelers verified that NTS was following their QPM procedures with one exception (see the nonconformance described in paragraph B.5).
- l. Control of Measuring and Test Equipment: The NRC inspector evaluated the NTS calibration system by reviewing calibration records, observing test setups, reviewing general data sheets, and verifying calibration of instruments being used in tests. The system was found to comply with the requirements of their QPM and it provided adequate control of instrumentation as well as traceability to the National Bureau of Standards.
- m. Handling, Storage and Shipping: The NRC inspector verified that NTS was following their QPM procedures by examining receiving inspection sheets and observing of items received by them. The items observed were found to be identified and properly stored for future use.
- n. Inspection, Test, and Operating Status: The NRC inspector verified that the use of job travelers was the same method described in the QPM to indicate test item status. The NRC review of the job travelers was accomplished by comparing job travelers with test procedures. The system appeared to be adequate.

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- o. Nonconforming Materials, Parts, or Components: NTS uses red "Hold" tags and "Notice of Deviation" (NOD) forms, as described in their QPM, to control nonconforming items. The NRC inspector was able to verify proper and adequate use of a representative NOD during the inspection; however, the actual use of red "Hold" tags was not observed.
- p. Corrective Action: The NRC inspector verified the QPM procedures for corrective action were being followed by NTS. This verification was accomplished by examination of the quality control action memo forms folder and vendor calibration folders. Corrective action request forms were found to be adequately completed as required by the QPM.
- q. Quality Assurance Records: The NRC inspector's review of open and closed MJO folders determined that NTS was following their QPM procedures in all cases except two (see the nonconformances described in paragraphs B.6 and B.7).
- r. Audits: The NRC inspector verified that comprehensive internal audits were being performed by NTS and that management was involved in them. The inspector determined by review of audit reports and checklists that the audits were performed according to the QPM with one exception (see nonconformance described in paragraph B.2).

No nonconformances were identified during the implementation review of the criteria discussed in paragraphs D.2.a, c-e, g, h, and l-p.

- 3. 10 CFR Part 21 Review: The NRC inspector verified NTS's compliance with the requirements of 10 CFR Part 21 by examining bulletin board postings of 10 CFR Part 21, Section 206 of the Energy Reorganization Act of 1974, and their 10 CFR Part 21 procedures (Element XIX of the Appendix to QPM, Revision C, dated July 7, 1982). The inspector reviewed the NTS 10 CFR Part 21 procedures and verified inclusion of 10 CFR Part 21 in outgoing PO's by review of two PO's. One violation was identified (see violation discussed in paragraph A).

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DOCUMENTS EXAMINED

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1	2	TITLE/SUBJECT	3	4
1	4	Quality Procedures Manual	July 7, 1982	Rev C
2	8	2 - Training Folders	N/A	
3	5	P.O. for calibration services, 631-26151	June 15, 1982	
4	5	P.O. for calibration services, 631-26482	June 10, 1982	
5	8	Master Job Order #528-0835	Apr 7, 1982	
6	8	Approved Vendor List	Dec 21, 1982	Rev B
7	8	2 - Vendor Survey Folders	N/A	
8	8	2 - Calibration Data Reports from Vendors	Dec 18, 1982	
9	8	3 - Calibration Records (Charge Amplifier, Recorder, Accelerometer)	Jul 13, 1982	
10	8	January Calibration Recall List	N/A	
11	7	Ltr PY-GAI/PRC-149 on MJO 548-9247-1/Rev E	Jan, 1983	
12	7	Ltr PY-GAI/PRC-151 on MJO 548-9247-2/Rev E	Jan 5, 1983	
13	8	Quality Control Action Memo Forms Folder	Jan 5, 1983	
14	3	Test Procedure 528-0946	Aug, 1981 thru Oct, 1982	
			Aug 3, 1982	

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 applicabl |

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1	2	TITLE/SUBJECT	3	4
15	8	Analysis Report No. 528-0946	July 30, 1982	
16	8	Analysis Report No. 528-0946	Sep 20, 1982	Rev A
17	3	Test Procedure No. 548-9247-1	Jan 4, 1983 (C)	Rev A-E
18	7	Letter approving Test Procedure 528-0946	Aug 20, 1982	
19	5	P.O. on MJO 528-0880 (# IH 2500-061)	July 14, 1982	
20	5	P.O. # P6979522 for test's per Test Procedure 41-3110C	July 1, 1982	
21	8	Agreement # 8856-J-51D	Apr 15, 1982	
22	8	Agreement # 8856-J-51D	Nov, 1982	Amend #1
23	5	P.O. # 13727 on MJO 548-9247	Sep 2, 1981	
24	5	P.O. # 13727 on MJO 548-9247	Jan 10, 1983	Rev #1
25	7	Audit Ltr on Audit at NTS Saugus (Included Audit Package)	Jan 10, 1983	
26	8	Audit Package for Audit at NTS Hartwood	Apr 7, 1982	
27	8	Audit Package for Audit at NTS Saugus	May 18, 1982	
28	8	NOD (Notice of Deviation) #1 on MJO 548-9247	Nov 11, 1982	
29	8	COP (Change of Procedure) #1 on MJO 548-9247	Sep 7, 1982	
30	8	MJO Folder 528-0924 Closed 1982		

Document Types:

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31	8	MJO Folder 528-0946 Closed 1982		

Document Types:

- Drawing
- Specification
- Procedure
- QA Manual
- Purchas Order
- Internal Memo
- Letter
- Other (Specify-if necessary)

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1	2	TITLE/SUBJECT	3	4
1	4	Quality Procedures Manual	7-7-82	C
2	3	Nuclear Qualification Test on Multileaf Damper with ITT MH91 Actuator (Procedure No 548-9247-1)	1-4-83	E
3	8	Nuclear Qualification Analysis on the above damper	12-1-82	D
4	8	Reference Report: ITT General Controls Report Number 730.1.128, Appendix II, Eng Rept, NH90 Actuators	—	
5	5	Change Order to P.O. for MJO 548-9247	1-10-83	1
6	5	P.O. on MJO 548-9247	9-2-81	G
7	8	General Log Sheet MJO 548-9247-1	1-11-83	
8	8	Test Equipment & Instrumentation List	1-11-83	
9	8	Receiving/Shipping Inspection on MJO 548-9247-2 (Capacitors)	1-11-83	
10	8	Job Traveler on 548-9247-1		

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