

Burnley Technology, Inc.



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15 June 1994

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Subject: Reply to Notice of Nonconformance

Dear Sir,

We are writing in response to the Notice of Nonconformance dated 17 May 1994, Docket 07100750.

A.1. Subsequent to the Inspection of 29 March 1994, the President of Burnley Technology, Inc. has reviewed the records provided by RTS Technology, Inc. relating to the fabrication of 10 Model 420 Type B Packages.

These packages were fabricated between 5 March 1990 and 21 January 1991. They were fabricated under USNRC Certificate of Compliance Number 6717, Revision 7. (Certificate of Compliance Number 9245, Revision 0 was issued on 30 March 1992).

USNRC Certificate of Compliance Number 6717, Revision 7 describes the package as a radiographic device within an overpack. The referenced drawing, Nuclear Packaging, Inc. Drawing No. SK-D-1, Rev. 2, specifies this overpack. The certificate further states that the contents must be secured within a single snug-fitting inner radiographic device which has a metal outer wall and meets the requirements of DOT Specification 7A packaging.

RTS Technology, Inc., through a series of subcontractors, fabricated the inner radiographic device to meet the requirements of DOT Specification 7A packaging. The Model 425 inner package was tested and evaluated against this specification and found to satisfy these requirements.

RTS purchased the Model 6717-B packages from Source Production and Equipment Co., Inc. Although RTS Technology, Inc. has been unable to produce a Purchase Order for the procurement of these packages in which the provisions of 10 CFR 71 were invoked, we have determined that Source Production and Equipment Co., Inc. operates under a USNRC Quality Assurance Program, Approval Number 102 which permits fabrication of Type B packages.

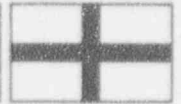
Subsequent to the fabrication of these initial 10 packages, RTS Technology, Inc. was issued USNRC Certificate of Compliance Number 9245, Rev. 0 on 30 March 1992. The drawings provided to the USNRC during the approval process for this Certificate of Compliance, and which were subsequently referenced in this Certificate of Compliance reflected the as-built condition of these 10 initial packages. As these drawings reflect the as-built condition which was reflected in the Certificate of Compliance, we have concluded that these initial packages comply with the requirements of this certificate.

Any subsequent packages fabricated under this Certificate of Compliance will be manufactured in accordance with the certificate and the Burnley Technology, Inc. Quality Assurance Program.

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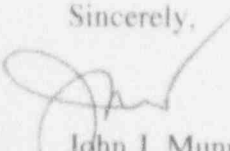
- A.2. Burnley Technology, Inc. did not properly evaluate and approve RTS Technology, Inc. as a vendor to perform a special process using a two-part mixable foam. RTS Technology, Inc. has agreed to remove from service the two Model 420 overpacks which were foamed during this operation and return them to Burnley Technology, Inc. Burnley Technology, Inc. will dispose of these overpacks. We are advised that these two overpacks are presently outside of the United States, and will be removed from service immediately upon their return. We expect this to be completed no later than 1 September 1994.
- A.3. Oversight of RTS Technology, Inc. during the fabrication and repair of two Model 420 overpacks was inadequate. RTS Technology, Inc. has agreed to remove from service the two Model 420 overpacks which were foamed during this operation and return them to Burnley Technology, Inc. Burnley Technology, Inc. will dispose of these overpacks.

Any future fabrication and repair of overpacks involving a special process using a two-part mixable foam will be controlled by a special process procedure and will be performed only by vendors which are properly evaluated and approved in advance of the operation.

- F.1. An assessment of the QA program had not been performed since the inception of the program on 22 September 1992. Burnley Technology, Inc. had not performed any design, or manufacturing activities since this inception. However, in view of the clarification of the requirements provided during the inspection, a complete assessment of the QA program is presently being conducted. This is expected to be completed by 30 September 1994.
- F.2. An audit of the QA program had not been performed since the inception of the program on 22 September 1992. Burnley Technology, Inc. had not performed any design, or manufacturing activities since this inception. However, in view of the clarification of the requirements provided during the inspection, an audit will be conducted subsequent to the complete assessment of the QA program described in item F.1. This is expected to be completed by 30 November 1994.

We trust that this provides the information required by your Notice of Nonconformance. We hope that this information is satisfactory. If we can provide any additional information, please contact us.

Sincerely,


John J. Munro III
President

xc: Mr. Robert L. Baer, Chief
Source Containment and Devices Branch
Division of Industrial and Medical Nuclear Safety
Office of Nuclear Material Safety and Safeguards
U. S. Nuclear Regulatory Commission
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