

# VENEGAS INDUSTRIAL TESTING LABORATORIES, INC



*New England Laboratories*

*Nashua Industrial Park*

*13 Progress Avenue Nashua, New Hampshire 03062*

*603 - 883 - 0796*

10 August 1994

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

Subject: Reply to a Notice of Violation

Dear Sir,

We are writing in response to the Notice of Violation dated 13 July 1994, Docket 07100100.

- A. Subsequent to the Inspection of 6 June 1994, a notice has been posted in the workplace of Venegas Industrial Testing Laboratories, Inc. describing the regulations of 10 CFR Part 21, the procedures adopted under 10 CFR Part 21, indicating where these regulations and procedures may be examined, and indicating to whom reports should be made. A copy of this Notice to Employees is appended to this letter
- B. The procedures adopted under 10 CFR Part 21 have been revised to specify required time frames for documenting, evaluating, controlling and reporting deviations, failures to comply and defects. A copy of this revised procedure is appended to this letter.
- C. Venegas Industrial Testing, Inc. did not achieve total compliance with the commitments made at the time of inception of the Quality Assurance Program. The company is making a determined effort to achieve total compliance. On 12 April 1994, we contracted with an outside consultant to conduct an audit and evaluation of our Quality Assurance Program. This audit revealed a number of deficiencies and recognized that a number of commitments made in our Quality Assurance Program had not been implemented. Subsequent to this audit, we developed a set of Quality Assurance Procedures which were approved by the President on 27 May 1994. The company is committed to achieving total compliance through the implementation of these procedures.

We have contracted with an outside consultant to perform another audit and evaluation of our Quality Assurance Program before the end of this year, and again during the first half of 1995 to measure our success in reaching this goal.

- D. Indoctrination and training of personnel in the requirements of the newly developed Quality Assurance Procedures Manual was conducted on 31 May 1994. A certificate to that effect is attached to this letter.
- E. As a result of this finding, the torque wrench in question has been removed from service, and tagged as such. This torque wrench will be send for recalibration using a Purchase Order which complies with the requirements of Quality Assurance Procedure 03.01 as soon as a supplier of calibration services has been deemed qualified.

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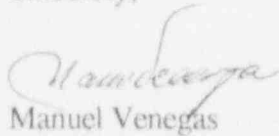
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# VENEGAS INDUSTRIAL TESTING LABORATORIES, INC.

- F. The three procedures of the Operating and Emergency Procedures Manual had been revised on 27 May 1994. These procedures had not been inserted into the manual which had been presented to the inspectors on 6 June 1994. These revised procedures have subsequently been inserted into all active copies of the Operating and Emergency Procedures Manual.
- G. The two suppliers in question, which had not been previously evaluated and qualified, were the supplier of the calibration service which calibrated a torque wrench, and Amersham Corporation which provided replacement parts for transport packages manufactured by Amersham Corporation under a USNRC-approved quality assurance program. As noted in Item E, above, the torque wrench in question has been removed from service, and tagged as such. This torque wrench will be sent for recalibration as soon as a supplier of calibration services has been deemed qualified. Subsequent to the inspection, we have determined that Amersham Corporation is a qualified supplier of replacement parts and services for packages designed and manufactured by Amersham Corporation.

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

Sincerely,



Manuel Venegas  
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  
Washington, DC 20555

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