

APPENDIX A

Southwest Research Institute
Docket No. 99900909/83-01

NOTICE OF NONCONFORMANCE

Based on the results of an NRC inspection conducted on October 11-14, 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. Nuclear Quality Assurance Procedure 13-1, paragraph 13.3.1(1), Revision 2, dated February 26, 1982, states, in part, "Failure to meet significant requirements contained in applicable procedures, instructions, specifications, . . . requires that a DNR [Deviation and Nonconformance Report] be written."

Contrary to the above, there was no documented objective evidence that DNRs were filled out for deviations from test procedures for testing documented in Report No. SWRI-7124, dated August 5, 1983. Examples of the above are:

1. Table 5.2 of Test Plan SWRI-06-7124, Revision 2, dated February 28, 1983, required a radiation aging exposure of 82.5 megarads for each Seitz safety relief valve; however, review of data in the test report indicated that the test valve No. C-3 received only 66.5 megarads of radiation during radiation aging. No DNR documenting this deviation from test plan requirements was available for review during the inspection.
2. Review of the test report stated that contact resistance values obtained during performance checks conducted on Namco limit switch No. B-1 on October 20, 1982, were higher than Test Plan SWRI-06-7124 acceptance values. No DNR documenting this deviation from test plan requirements or the corrective action taken regarding it were available for review during the inspection.

- B. Nuclear Qualification Test Plan SWRI-06-7124, paragraph 5.5, Revision 2, dated February 28, 1983, states, in part, "This baseline performance test shall demonstrate that the requirement complies with the operability requirement described in Tables 2.2-1 to 2.2-3."

Table 2.2-1 of Appendix B to SWRI-06-7124 states, in part, "Response Time: Max, 2.0 sec. to reach 63% of a step change"

Contrary to the above, review of Test Report No. SWRI-06-7124 did not identify that a response time verification was ever performed on the Pyco temperature elements nor was there any documented objective evidence releasing SWRI from this test requirement.