J.L. SHEPHERD & ASSOCIATES
1010 ARROYO AVE., SAN FERNANDO, CALIFORNIA 91340-1822
818-898-2361 FAX 818-361-8095

January 7, 1993

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Reference: A Reply to a Notice of Nonconformance, Docket No. 71-0122
Additional submittals as referenced in our letter of December 3, 1992.

Per the above referenced Notice of Nonconformance, the two notice of nonconformances are addressed below.

B. 10CFR71.137 "Audits."
J.L. Shepherd and Associates admits incompletion of alleged nonconformance.
Reply: As we went on-line with a new computer system, we were trying to work out "bugs" and incorporate each applicable area into the QA Program Plan, with specific audits. We started this process, with documentation (see the enclosed Audit) but did not complete the process formally in accordance with our Program Plan.

Corrective Steps: we have had a Preaudit Conference (results enclosed), and are in the process of completing our internal audit. We will be pleased to forward reports as the Audit is completed. **(RESULTS ENCLOSED.)**

J.L. Shepherd, President

JLS/mfs
CC: Branch Chief, Transportation Branch, Office of Nuclear Material Safety & Safeguards (NMSS)

110081

NT02

DECEMBER 30, 1992 - JLS&A YEARLY INTERNAL AUDIT - POSTAUDIT CONFERENCE

Postaudit Time: 2:30 PM.

Attendees:
JL Shepherd, MF Shepherd, DC Shepherd, JS Shepherd, Q Pho, D. Tran, V Towne, M Pauls, L Weiss, K Thoune, RN Donelson, P Shepherd, J Fuzzell, B Peabody, N Pho

Working Groups & Postaudit Review Synopsis:

1. Organization Chart:
   - MF Shepherd, reviewer
   - K Thoune, head of audit review group
   - Audit showed that the following are current:
     - organizational chart
     - job descriptions
     - training documentation
     - resumes
   - Audit showed that all QC/QC personnel have reportability to upper management.
   - The computer program does not directly effect QA/QC personnel or job descriptions, payroll reflects all personnel.

2. QA Program Plan:
   - MF Shepherd, reviewer
   - Q Pho & M Pauls, heads of audit review group
   - Audit of QA Program Plan for discrepancies, nonconformances, changes needed.
   - No discrepancies found in our commitment - all 18 points.
   - The Program Plan appears in WordStar word processing, not the RealWorld program, and does not impact the QA/QC program. Program Plan, with current revisions is stored in the Network, on floppy disks and appears on Network back-up tapes.
   - The Program Plan is currently approved until 1995.

3. Design Control:
   - JL Shepherd, reviewer
   - V Towne, head of audit review group
   - Procedures for design documentation & changes seem to be adequate & pertinent departments are made aware of changes.
   - No pertinent changes have been made which involve licensing authorities this year, past changes & notifications to the State of California re. devices seem adequate.
   - A random audit of vellum files and 20 closed &/or open jobs showed that vellums are correctly filed & current drawings are part of job files.
   - The Autocad system operates the same as manual drawings - all are reviewed & signed off, as are all revisions & changes.

4. Procurement Document Control:
   - Q Pho, reviewer
   - L Weiss, head of audit review group
   - A random audit of 30 PO's showed that
     - references & specifications appeared when necessary,
     - Subpart H criteria & right of access clause stamps appeared on PO's,
     - drawings, specs, etc, were referenced & sent with PO as required,
     - Bills of Materials contained proper references & request for certs, etc.

changes were reviewed by appropriate departments
incoming purchases are checked for certs & verification of specs from PO,
nonconforming parts are sent back to vendors
reason for vendor mess up is reviewed
the computer system does not change the QA/QC requirements for PO's -
those are hand stamps carried over from manually typed PO's & past computer generated PO's.

5. Manufacturing Control:
JL Shepherd, reviewer
JS Shepherd & N Pho, heads of audit review group
Areas of audit covered:
Random spot checks of different manufacturing procedures (welding, machining, assembly) showed that procedures are followed.
Review of manufacturing procedures, instructions & drawings showed that they are prepared, approved, reviewed & controlled. Some did not have the new QAM/QP info - a review of our commitments showed that we are only revising documents & instructions, etc., as the need arises - these were previously approved under past program approvals & we did not commit to unilateral revision of documents.
Audit of important to safety items procedures, instructions, drawings. etc., include tolerances & workmanship.
Audit of QA/QC inspection reports showed that tolerances, etc. have been documented & met. Acceptance criteria called out also.
A review of Job Entry (previously audited in 1991 for QA/QC applicability) was checked. The computer program itself does not impact QA/QC documentation - signoffs & lists are added by acetate copy to the computer information sheet, subject to new QAM/QP review & approvals.
Audit showed that 10CFR71 procedures are part of manufacturing procedures & followed during manufacturing.
Audit showed that shipping container packages had proper unloading/loading & DOT procedures and that they are followed.
The computer program does not effect this section at all.

6. Document Control:
MF Shepherd, reviewer
D Tran & L Weiss, heads of audit review group
Review showed that QA/QC documents & revisions are subject review & approval by the appropriate dept's. Note - previously approved QA documents which have not been revised with new QAM/QP matrix info, will be revised as changes occur.
All JLS&A QA/QC documents are on site already - we only have one plant. For field work, copies of pertinent QA/QC documents &/or procedures are sent as part of the trip package.
All current QAM/QP documents are in the word processing program, floppies & on hard disk backup tapes.

7. Control of Purchased Materials, Parts & Components:
Q Pho, reviewer
D Shepherd, head of audit review group
Vendor selection process reviewed - is controlled by the appropriate dept.
Designated vendor QA programs have been audited or we have audit approvals by other companies/gov't. agencies on file. In 1993, we need to review whether these approvals have expired & obtain current copies. No new vendors requiring audits

in 1992.
No visits to vendors for QA compliance were required in 1992.
Receivers for PO's are kept on file with certs, etc.
Material Rejection forms are kept on file for purchased parts.
Repair or replacement documentation on purchased parts is kept as part of the Receiver files. Note: per FDA, we now track timers by SN in a log.
Items that are improperly identified or that don't correspond to PO description are held aside by the appropriate dept. until dispositioned.
Certs of conformance are acceptance tags at JLS&A & are attached to items.
Nonconforming items are held in a separate location from approved inventory.
PO's, receivers & certs are kept in specifi files.
The computer program doesn't effect QA/QC in this section.

8. ID & Control of Materials, Parts & Components
D Tran, reviewer
V Towne, head of audit review group
We have established procedures for part I.D.
A random spot check of approx. 40 received &/or fabricated showed I.D. &/or marking to QA.
Nonconforming parts are kept separate form inventory.
Noninspected parts are kept separate from inventory.
The receiving & inspections areas do not hurt or interfere with items.
Inventory items are checked for proper job before release - they are marked with Job # when taken from inventory & put into work in process.
Inventory items are not put into computer until inspected & accepted - so QA/QC functions are not really effected.

9. Special Processes:
RN Donelson, reviewer
JS Shepherd, head of audit review group
Special processes are controlled & current personnel & procedures are on file.

10. Inspection Control:
J Fuzzell, reviewer radiological
Q Pho, reviewer nonradiological
B Peabody, head of radiological audit review group
N Pho, head of nonradiological audit review
QA/QC inspections are documented, usually by checklists.
Work was found to be held for inspections.
On important to safety items, inspections, wipe tests, rad. surveys, log entries & document evaluations are performed & documented. note: audited quarterly by outside HP, per St. of CA license.
If direct control of processing methods isn't possible, forms, lists, etc., for radiological must be approved by senior personnel.
Final inspections - check integrity thru review of specs, PO's, records & inspections.
Competed items are stored in such a manner as to protect them from physical or environmental damage.
A review of inspectors training file shows that inspectors are qualified per JLS&A's criteria.
The computer programs do not effect this section - documents on word processing - with backups as listed above.

11. Test Control:
    RN Donelson, reviewer
    Q Pho, head of audit review group
    Prototype testing is performed according to regulatory and/or ANSI criteria & documented, files reviewed.
    A random check of 10 files showed that repairs & replacements met original specs.
    Testing procedures per regulatory or ANSI guidelines includes specs as called out in QA Program Plan.
    A review of all shipping container files shows that applicable NRC, DOT & IAEA criteria, including certificates, are current.
    Under our State of CA license & NRC approval - containers remain free of contamination & radiation, as documented by wipe test logs & certs.
    The computer program has no direct effect on this section.

12. Calibration Equipment:
    D Shepherd, reviewer
    P Pho, head of audit review group
    A check of radiation survey instruments show that they are calibrated & certified quarterly, with S.N. & date of next calibration.
    A check of other measuring & test equipment show that they are calibrated yearly, with S.N.& date of next calibration.
    Certs with NIST, ANSI etc., traceability kept on file.
    No instruments found to be out of calibration within 1991-1992 time frame.
    PO's for outside vendor calibration were examined & found to meet all PO requirements.
    PO's are the only computer interface with this section.

13. Handling, Shipping & Storage:
    J Fuzzell, reviewer radiological
    Q Pho, reviewer nonradiological
    P Peabody, head radiological audit review group
    P Shepherd, head nonradiological audit review group
    A review of personnel & their qualifications who do special handling, storage & shipping shows that they are qualified & trained.
    A review of final inspections show that they are performed & documented per NRC, DOT & IAEA (when applicable) specs before shipment.
    All shipping paperwork is reviewed & verified by management.
    10CFR21.6 posting has been accomplished.
    The computer program does not effect this section, except for word processing.

14. Inspection, Test & Operating Status:
    D Tran, reviewer
    N Pho, head audit review group
    A review of files showed that documentation concerning, inspection, test & operating status of shipping containers is sent to the appropriate departments, customers & other organizations, as required.
    Inspection tags & I.D. are noted & checked when removed.
    The computer program doesn't effect this section.

15. Control of Nonconforming Material, Parts or Components:
    D Shepherd, reviewer
    V Towne, head audit review group
    Procedures for receiving & inspection were reviewed - nonconforming parts are kept

separate from inventory & the appropriate departments are notified.
A review of 10 files showed that reworked/repaired items were re-inspected to the original criteria.
10CFR21.6 postings requirement have been met.
Purchased parts are traced thru the computer system, rejected parts are sent back - before the inventory process is started, thru purchasing.

16. Corrective Action:
JL Shepherd reviewer
Q Pho, head audit review group
Material rejections are submitted to the proper departments so returns to vendor or production rework can be accomplished.
Audit corrective actions are reviewed in postaudits.
The computer program doesn't effect this section.

17. QA Records:
RN Donelson, reviewer
J Fuzzell, head radiological audit review group
P Shepherd, head nonradiological audit review group
The following records were reviewed for quality & safety:
drawings, specifications, PO's, operating logs, reviews, tests, audits, mat'l. analysis, personnel qualifications, procedures, nonconformances & corrective actions.
Permanent records are legible & complete & documents are retrievable.
Records are preserved & filed in metal cabinets - some special records are controlled directly by departments.

18. Audits:
MF Shepherd, reviewer
M Pauls, head audit review group
This audit was conducted in the prescribed manner - except that we didn't meet at a local cantina, everyone was disappointed.
Lead auditor & auditor qualifications have been established & are on file.
Preaudit conference was scheduled.
Postaudit conference was scheduled.
Audit was performed in a timely manner.
Audit results are in work processing, with backups.

All agree that we should audit sections on a monthly basis.
It has been determined that the review groups for the year be established at the next Preaudit meeting. All agreed that the next Preaudit meeting will take place on Jan 15, 1993, at 3:00 pm.

Notes taken by M Pauls.

MIP/mp
1/5/93

FINAL COMPLETION CHECKLIST FOR INTERNAL AUDITING OF JLS&A'S QA/QC PROGRAM

10CTR SUBPART H CRITERIA TITLE	HEAD OF AUDIT REVIEW GROUP	MANAGEMENT REVIEWER	DATE COMPLETED
1. Organization Chart & Job Descriptions	K. THOWNE	M.F. SHEPHERD	10/27/92 K.T. MFS
2. QA Program Plan	Q. PHO M PAULS	M.F. SHEPHERD	11/20/92 MP. IMFS
3. Design Control	V. TOWNE	J.L. SHEPHERD	11/9/92 VT JLS
4. Procurement Document Control	L. WEISS	Q. PHO	11-19-92 LW
5. Manufacturing Control	J.S. SHEPHERD N. PHO	J.L. SHEPHERD	7 Dec '92 JSS/LSNP DT
6. Document Control	D. TRAN L. WEISS	M.F. SHEPHERD	11-17-92 LW IMFS
7. Control of Purchased Mat'ls, Parts & Comp.	Q. PHO	D. SHEPHERD	11-26-92 DT TDS
8. ID & Control of Mat'ls, Parts & Comp.	V. TOWNE	D. TRAN	11/27/92 VT DT
9. Control of Special Processes	J.S. SHEPHERD	RN. DONELSON	JS 11/18/92 RND
10. Inspection Control	G. PEABODY - RAD. N. PHO - NONRAD.	J. FUZZELL - RAD Q. PHO - NONRAD.	JF 11-16-92 BLP NP
11. Test Control	Q. PHO	R.N. DONELSON	11-20-92 RND
12. Calibration Equipment	N. PHO	D. SHEPHERD	11/27/92 TDS NP
13. Handling, Shipping & Storage	B. PEABODY - RAD P. SHEPHERD - NON RAD	J. FUZZELL - RAD. Q. PHO - NON RAD	11-10-92 JF 11-11-92 BLP LW
14. Inspection, Test & Operating Status	N. PHO	D. TRAN	DT 12/8/92 NP.
15. Control of Nonconform. Mat'l, Parts & Comp.	V. TOWNE	D. SHEPHERD	12/2/92 VT TDS
16. Corrective Action	Q. PHO	J.L. SHEPHERD	12-04-92
17. QA/QC Records	J. FUZZELL - RAD P. SHEPHERD - NON RAD	RN DONELSON	11-20-92 RGND 11-3-92 DT
18. Audits	M PAULS	MF SHEPHERD	12/7/92 MP/IMFS

PREAUDIT REVIEW DATE: 10/26/1992
AUDIT COMPLETION DATE: 12/07/1992
POST AUDIT REVIEW DATE: 12/30/1992
POSTAUDIT MANAGEMENT REVIEW DATE: 12/7/92

J.L. SHEPHERD, PRESIDENT

QAM/QP 18.0 Audits, Implementing Procedure, QA-RM-001-A, Rev. 3, 10/10/90
Rev. 0, Appr.:JLS 10/1/92, Location: MFS WordStar, QA18AUDL
QAM/QP 6.0 Document Control. Any revision to this document must be numbered, dated & approved.

INDIVIDUAL CRITERIA CHECKLIST (18 TITLES)
FOR INTERNAL AUDITING OF JLS&A'S QA/QC PROGRAM

1. ORGANIZATION CHART & JOB DESCRIPTIONS

HEAD OF AUDIT REVIEW GROUP: K. THOUNE K. Thoune
MANAGEMENT REVIEWER: M.F. SHEPHERD M.F. Shepherd
DATE COMPLETED: 10/27/92

QUESTIONS:	YES	NO	COMMENTS
1. Is the Organization Chart current?	✓		
2. Are all QA/QC personnel listed?	✓		
3. Are responsibilities listed?	✓		
4. Is there reporting ability to upper management?	✓		
5. Are resumes & training records on file?	✓		
6. Does the computer program effect this section?		✓	

INDIVIDUAL CRITERIA CHECKLIST (18 TITLES) FOR INTERNAL AUDITING OF JLS&A'S QA/QC PROGRAM

2. QA/QP PROGRAM PLAN.

HEAD OF AUDIT REVIEW GROUP: Q PHO + M. PAULS Maya Pauls
MANAGEMENT REVIEWER: M.F. SHEPHERD Mary F Shepherd
DATE COMPLETED: 11-20-92

QUESTIONS:	YES	NO	COMMENTS
1. Is Plan approval current?	✓		
2. Is approval resubmittal due next year?		✓	
3. Does the computer program effect this section?		✓	

No commitments found that we do not meet. All 18 points.
11/20

INDIVIDUAL CRITERIA CHECKLIST (18 TITLES)
FOR INTERNAL AUDITING OF JLS&A'S QA/QC PROGRAM

3. DESIGN CONTROL .

HEAD OF AUDIT REVIEW GROUP: V. TOWNE Vickie Towne
MANAGEMENT REVIEWER: J. by SHEPHERD
DATE COMPLETED: 11/9/92

QUESTIONS:	YES	NO	COMMENTS
1. Are the procedures adequate for ensuring that all documentation has all pertinent info & conforms to pertinent regulations?	X		
2. Are design change procedures adequate?	X		
3. Are all appropriate departments notified of changes?	X		
4. Review of changes - are they documented?	X		
5. Are changes checked & approved before release?	X		
6. Are licensing authorities notified when pertinent changes occur?	X		No pertinent changes have been made
7. Are design control change procedures controlled?	X		
8. Are vellums filled correctly?	X		
9. Do job files have current drawings?	X		
10. Does the Autocad system have any impact on design procedures?		X	

INDIVIDUAL CRITERIA CHECKLIST (18 TITLES) FOR INTERNAL AUDITING OF JLS&A'S QA/QC PROGRAM

4. PROCUREMENT DOCUMENT CONTROL.

HEAD OF AUDIT REVIEW GROUP: L. WEISS
MANAGEMENT REVIEWER: Q. PHO
DATE COMPLETED: 11-19-92

QUESTIONS:	YES	NO	COMMENTS
1. Are purchasing dept. procedures adequate?	✓		
2. Are the appropriate references & specifications appearing on PO's?	✓		
3. Is Subpart H criteria appearing on PO's?	✓		
4. Are source inspection "right of access" clauses included on PO's?	✓		
5. Do PO's contain the appropriate references, drawings, specifications, procedures, etc?	✓		
6. Do Bills of Materials include appropriate records, certs or test results to accompany order or be retained by vendor?	✓		
7. Are changes to PO's reviewed by the appropriate departments?	✓		
8. Are incoming purchases checked on delivery for verification of specifications?	✓		
9. Are nonconforming parts returned to vendor?	✓		
10. is the offending vendor reviewed?	✓		
11. Does the Realworld computer system effect or change any part of QA/QC Program?		✓	

INDIVIDUAL CRITERIA CHECKLIST (18 TITLES)
FOR INTERNAL AUDITING OF JLS&A'S QA/QC PROGRAM

5. MANUFACTURING CONTROL

HEAD OF AUDIT REVIEW GROUP: J.S. SHEPHERD + N. PHO, J.S. not applicable
MANAGEMENT REVIEWER: J.L. SHEPHERD
DATE COMPLETED: 7 Oct 1992

QUESTIONS:	YES	NO	COMMENTS
1. Are manufacturing procedures being adhered to in accordance with procedures, instructions inspections &/or drawings?	✓		
2. Are manufacturing procedures, instructions, inspections &/or drawings prepared, approved, reviewed & controlled?	✓		
3. In reference to important ~~to~~ safety items, do the procedures, instruction &/or drawings include tolerances, operating limits &/or workmanship?	✓		
4. In reference to important to safety items, does the inspection & acceptance criteria verify that tolerances, operating limits & workmanship have been met?	✓		
5. Do the QA and Radiological Dept's. review inspection plans, test, calibration and special process procedures, drawings &/or specifications and alternates thereto?	✓		
6. What areas are effected by the computer program & have adequate measures been taken to incorporate the program into the QA Program?	✓		* Job Entry for o'pack repair
7. Are 10CFR71 procedures for packages incorporated into manufacturing?	✓		
8. Are repair, rework &/or maintenance of packages established & prescribed to before work begins?	✓		* VIA Work order
9. Are package loading/unloading procedures (rad. surveys, contamination wipe tests, temp. & pres. measurements, package venting, rigging & movement as applicable) established?	✓		
10. Are package procedures established for proper DOT transport (in good condition, adequately secured, identified properly)?	✓		
11. Does the computer program effect this section?	✓		* SAMAS

INDIVIDUAL CRITERIA CHECKLIST (18 TITLES)
FOR INTERNAL AUDITING OF JLS&A'S QA/QC PROGRAM

6. DOCUMENT CONTROL.

HEAD OF AUDIT REVIEW GROUP: D. TRAN & L. WEISS
MANAGEMENT REVIEWER: M.E. SHEPHERD
DATE COMPLETED: 11-17-92

QUESTIONS:	YES	NO	COMMENTS
1. Are all QA/QC documents & revisions subject to review & concurrence by appropriate departments?	✓		
2. Are issuance of QA/QC documents & revisions procedurally controlled?	✓		
3. Does the department which makes a revision to documents supervise the processing of the change or revision?	✓		
4. Are revisions made on all appropriate documents?	✓		
5. Are all pertinent QA/QC documents available at the site where they are to be implemented?	✓		
6. Are revisions current & do they appear on the appropriate documents?	✓		
7. Does the computer program effect this section?		✓	

INDIVIDUAL CRITERIA CHECKLIST (18 TITLES)
FOR INTERNAL AUDITING OF JLS&A'S QA/QC PROGRAM

7. CONTROL OF PURCHASED MATERIALS, PARTS & COMPONENTS.

HEAD OF AUDIT REVIEW GROUP: Q. PHO
MANAGEMENT REVIEWER: D. SHEPHERD
DATE COMPLETED: 11-26-92

QUESTIONS:	YES	NO	COMMENTS
1. Is vendor selection controlled or approved by Engineering, Radiological or QA/QC?	✓		
2. Have designated vendor QA programs been audited?	✓		NCEP TO REVIEW FOR EXPIRED APPROVALS IN 93
3. Do designated vendors QA Programs comply with pertinent elements of 10CFR71, Subpart H or 10CRF21?	✓		
4. Are vendor records reviewed before purchase of similar types of articles?	✓		
5. If required, are vendors selected on the basis of bids & evaluation of 10CFR71, Subpart H compliance?	✓		
6. Do the appropriate department representatives visit a designated vendor to assure QA/QC compliance during fabrication, testing, etc?	✓		
7. Is documentation kept which identifies the purchased part, mat'l., etc., and that pertinent standards, codes, etc. have been met?	✓		
8. Is documentation kept which describes nonconformances of purchased items?	✓		
9. If a nonconforming item has been repaired or replaced, is ... appropriate documentation kept?	✓		
10. Are on-site vendor inspections subject to in-house QA/QC standards?	✓		
11. Is material which is not properly identified or does not correspond to the purchase description controlled by QA or Radiological, until disposition is ascertained?	✓		
12. Are certificates of conformance, concerning acceptance of materials, distributed with item?	✓		
13. Are nonconforming items held separate until a review and disposition of item has been performed?	✓		

7. CONTROL OF PURCHASED MATERIALS, PARTS & COMPONENTS.
PAGE 2,

14. Are records identifying the item, with specific PO requirements & certifications & any nonconformances and resolutions thereof kept in job or other files as permanent records?	✓		
15. Are results of supplier/vendor evaluations kept on file?	✓		
16. Does the computer program effect this section?		✓	

INDIVIDUAL CRITERIA CHECKLIST (18 TITLES)
FOR INTERNAL AUDITING OF JLS&A'S QA/QC PROGRAM

8. I.D. & CONTROL OF MATERIALS, PARTS & COMPONENTS.

HEAD OF AUDIT REVIEW GROUP: V. TOWNS Vicki Towne
MANAGEMENT REVIEWER: P. TRAN Signed
DATE COMPLETED: 11/27/92

QUESTIONS:	YES	NO	COMMENTS
1. Are there standard procedures for identifying part, etc., either as received or fabricated?	X		In House Job #
2. Are received or fabricated parts inspected, identified & marked?	X		
3. Is the identification & marking traceable to QA/QC records?	X		
4. Are nonconforming or noninspected parts kept separate from approved inventory?	X		WITH TAGS- Rejected & Approved
5. Are important to safety items identified & marked & traceable to QA/QC records?	X		
6. Does the receiving area & method of identification for received or fabricated parts in any way interfere with fit, function or quality of an item?		X	
7. Are inventory items verified that they are the proper item for a job before release for fabrication, assembly or installation?	X		
8. Are partial releases of nonconforming or non-inspected items controlled?		X	DONT RELEASE
9. Does the computer program effect this section?		X	Items Inventoried on Computer Only.

INDIVIDUAL CRITERIA CHECKLIST (18 TITLES)
FOR INTERNAL AUDITING OF JLS&A'S QA/QC PROGRAM

9. CONTROL OF SPECIAL PROCESSES.

HEAD OF AUDIT REVIEW GROUP: J. S. SHEPHERD
MANAGEMENT REVIEWER: R. N. DONELSON
DATE COMPLETED: 18 Nov '92

QUESTIONS:	YES	NO	COMMENTS
1. Are special processes (welding, heat treating, cleaning, nondestructive testing, etc.) procedurally controlled by the foreman in house and by QA at vendor facilities?	✓		
2. Does the equipment, personnel & procedures involved in special processes meet all applicable codes, standards, etc.?	✓		
3. Are records concerning equipment, personnel & processes current & on file?	✓		
4. Does the computer program effect this section?		X	

INDIVIDUAL CRITERIA CHECKLIST (18 TITLES)
FOR INTERNAL AUDITING OF JLS&A'S QA/QC PROGRAM

10. INSPECTION CONTROL - NON RADIOLOGICAL

HEAD OF AUDIT REVIEW GROUP: D. PHO
MANAGEMENT REVIEWER: Q. PHO
DATE COMPLETED: 11/10/92

QUESTIONS:	YES	NO	COMMENTS
1. Are QA/QC inspections documented by written & controlled procedures, instructions or checklists?	√		
2. Is work held for inspections at appropriate phases?	√		
3. Do receiving inspection verify the integrity of important to safety items, i.e. inspections, wipe tests, radiation surveys, log entries & document evaluation?	√		
4. On reusable shipping containers, are inspections performed & are maintenance items identified?	√		
5. On reusable shipping containers, if replacement items are required, is a specific job file established & are design evaluations, purchasing, inspections & acceptance criteria performed before rerelease of the container?	√		
6. Do procedures ensure that indirect control of processing methods, equipment & personnel is verified by documentation if direct supervision is impractical?	√		
7. Do final inspections verify item integrity thru operational check out, reassessment of all idetifiable & traceable records, documents & inspections?	√		
8. Are completed items protected from physical & environmental damage prior to shipment?	√		
9. Do inspectors inspect items, including modifications, repairs or replacements in accordance with original design specifications & are inspections documented?	√		
10. Have inspectors been qualified to applicable codes, standards &/or training programs and are their certifications & qualifications current and on file?	√		
11. Does the computer program effect this section?		√	

INDIVIDUAL CRITERIA CHECKLIST (18 TITLES)
FOR INTERNAL AUDITING OF JLS&A'S QA/QC PROGRAM

10. INSPECTION CONTROL – RADIOLOGICAL

HEAD OF AUDIT REVIEW GROUP: B. PEABODY
MANAGEMENT REVIEWER: J. FUZZELL
DATE COMPLETED: 11-06-92

QUESTIONS:	YES	NO	COMMENTS
1. Are QA/QC inspections documented by written & controlled procedures, instructions or checklists?	✓		
2. Is work held for inspections at appropriate phases?	✓		
3. Do receiving inspection verify the integrity of important to safety items, i.e. inspections, wipe tests, radiation surveys, log entries & document evaluation?	✓		
4. On reusable shipping containers, are inspections performed & are maintenance items identified?	✓		
5. On reusable shipping containers, if replacement items are required, is a specific job file established & are design evaluations, purchasing, inspections & acceptance criteria performed before rerelease of the container?	✓		
6. Do procedures ensure that indirect control of processing methods, equipment & personnel is verified by documentation if direct supervision is impractical?	✓		
7. Do final inspections verify item integrity thru operational check out, reassessment of all idetifiable & traceable records, documents & inspections?	✓		
8. Are completed items protected from physical & environmental damage prior to shipment?	✓		
9. Do inspectors inspect items, including modifications, repairs or replacements in accordance with original design specifications & are inspections documented?	✓		
10. Have inspectors been qualified to applicable codes, standards &/or training programs and are their certifications & qualifications current and on file?	✓		
11. Does the computer program effect this section?		N/A	NO computer input or use necessary for QA/QC

INDIVIDUAL CRITERIA CHECKLIST (18 TITLES)
FOR INTERNAL AUDITING OF JLS&A'S QA/QC PROGRAM

11. TEST CONTROL.

HEAD OF AUDIT REVIEW GROUP: Q. PAO
MANAGEMENT REVIEWER: RN DONELSON
DATE COMPLETED: 11-30-92

QUESTIONS:	YES	NO	COMMENTS
1. Are test programs (prototype, licensing, etc.) established, documented & performed?	✓		
2. Are modifications, repairs or replacements to the original design meet the original specifications or acceptable alternatives?	✓		
3. Do established procedures identify test criteria, including instrument calibration & condition, monitoring, hold points, environmental conditions methods of physical I.D., documentation & acceptance criteria?	✓		
4. Are test programs evaluated & determined to be acceptable by engineering, QA, radiological &/or officers of JLS&A as applicable?	✓		
5. Do shipping containers meet acceptance criteria (applicable NRC or DOT certificates are current, physical inspection of container completed & documented) prior to shipment?	✓		
6. Is there an established program to ensure that containers remain free of excessive contamination & radiation by wipe test?	✓		
7. Does the computer program effect this section?		✓	

INDIVIDUAL CRITERIA CHECKLIST (18 TITLES)
FOR INTERNAL AUDITING OF JLS&A'S QA/QC PROGRAM

12. CONTROL OF MEASURING & TEST EQUIPMENT.

HEAD OF AUDIT REVIEW GROUP: D. PHD
MANAGEMENT REVIEWER: P. SHEPHERD
DATE COMPLETED: 11/27/92

QUESTIONS:	YES	NO	COMMENTS
1. Are radiation survey instruments calibrated at 3 month intervals?	√		
2. Are other measuring & test equipment calibrated at yearly intervals?	√		
3. Do all test & measuring equipment have serial numbers?	√		
4. Is the serial number referenced on test data?	√		
5. Is the equipment tagged as to the next date of calibration?	√		
6. Does the calibration of equipment meet applicable standards, NIST, etc.?	√		
7. Are calibration records kept on file?	√		
8. If equipment is found to be out of calibration, are new test or measurements taken to validate previous measurements?	√		
9. Does the computer program effect this section?		√	PC for Calibration when needed.

INDIVIDUAL CRITERIA CHECKLIST (18 TITLES)
FOR INTERNAL AUDITING OF JLS&A'S QA/QC PROGRAM

13. HANDLING, STORAGE & SHIPPING. - NON RADIOLOGICAL

HEAD OF AUDIT REVIEW GROUP: P. SHEPHERD 11-10-92
MANAGEMENT REVIEWER: Q. PHO
DATE COMPLETED: 11-10-92

QUESTIONS:	YES	NO	COMMENTS
1. Do qualified employees perform work related to special handling, preservation, storage, cleaning, packaging & shipping requirements to preclude physical or environmental damage?	✓		
2. Are final inspection performed & documented, per NRC &/or DOT requirements, before shipment is made?	✓		
3. Is shipping paperwork verified that it has been properly prepared?	✓		
4. Is shipment time consistent with safe transportation time?	✓		
5. Has 10CFR21.6 posting requirements been established?	✓		
6. Does the computer program effect this section?		✓	

INDIVIDUAL CRITERIA CHECKLIST (18 TITLES)
FOR INTERNAL AUDITING OF JLS&A'S QA/QC PROGRAM

13. HANDLING, STORAGE & SHIPPING. - RADIOLOGICAL

HEAD OF AUDIT REVIEW GROUP: B. PEABODY BLP
MANAGEMENT REVIEWER: J. FUZZELL JF
DATE COMPLETED: 11-11-92

QUESTIONS:	YES	NO	COMMENTS
1. Do qualified employees perform work related to special handling, preservation, storage, cleaning, packaging & shipping requirements to preclude physical or environmental damage?	✓		
2. Are final inspection performed & documented, per NRC &/or DOT requirements, before shipment is made?	✓		
3. Is shipping paperwork verified that it has been properly prepared?	✓		
4. Is shipment time consistent with safe transportation time?	✓		
5. Has 10CFR21.6 posting requirements been established?	✓		not related to QA/QC procedures
6. Does the computer program effect this section?		N/A	

INDIVIDUAL CRITERIA CHECKLIST (18 TITLES)
FOR INTERNAL AUDITING OF JLS&A'S QA/QC PROGRAM

14. INSPECTION, TEST & OPERATING STATUS.

HEAD OF AUDIT REVIEW GROUP: D. PHO
MANAGEMENT REVIEWER: D. TRAN Director
DATE COMPLETED: 12/8/92

QUESTIONS:	YES	NO	COMMENTS
1. Is the appropriate documentation (& id of inspections, tests & operating status) of shipping containers forwarded to the appropriate departments or organizations (shipping agents, customers, etc.) and receipt acknowledged?	√		
2. Is the removal of inspection or i.d. indicators checked at time of removal?	√		
3. On controlled items, is the removal of inspection or i.d. indicators checked & documented?	√		
4. Are nonconforming parts identified and are they kept in a separate location?	√		
5. Does the computer program effect this section?		√	

INDIVIDUAL CRITERIA CHECKLIST (18 TITLES)
FOR INTERNAL AUDITING OF JLS&A'S QA/QC PROGRAM

15. CONTROL OF NONCONFORMING MATERIALS.

HEAD OF AUDIT REVIEW GROUP: V. TOWNE Vicki Towne
MANAGEMENT REVIEWER: D. SHEPHERD D. Shepherd
DATE COMPLETED: 12/2/92

QUESTIONS:	YES	NO	COMMENTS
1. Are there established procedures for receiving & inspection to assure that the i.d., documentation, segregation of review disposition of nonconforming materials?	X		Rejection Form
2. Are the appropriate departments notified so that the repair or replacement of nonconforming items can be achieved?	X		
3. Are all reworked, repaired or replaced items subject to the original inspection &/or test procedures?	X		
4. Are nonconformance reports evaluated to determine quality trends or problem areas?	X		
5. Has 10CFR21.6 posting requirements been met?	X		
6. Does the computer program effect this section?		X	Purchased Parts are traced thru the system.

INDIVIDUAL CRITERIA CHECKLIST (18 TITLES)
FOR INTERNAL AUDITING OF JLS&A'S QA/QC PROGRAM

16. CORRECTIVE ACTION.

HEAD OF AUDIT REVIEW GROUP: Q. PHO
MANAGEMENT REVIEWER: J. L. SHEPHERD
DATE COMPLETED: 12-04-92

QUESTIONS:	YES	NO	COMMENTS
1. Are corrective actions evaluated and reported to the appropriate departments?	✓		
2. Are corrective action proceedings followed up with reviews to determine effectiveness?	✓		
3. Does the computer program effect this section?		✓	

INDIVIDUAL CRITERIA CHECKLIST (18 TITLES)
FOR INTERNAL AUDITING OF JLS&A'S QA/QC PROGRAM

17. QA RECORDS. - DOE RADIOLOGICAL

HEAD OF AUDIT REVIEW GROUP: P. SHEPHERD 11-20-92
MANAGEMENT REVIEWER: R.W. DOWELSON
DATE COMPLETED: 11-20-92

QUESTIONS:	YES	NO	COMMENTS
1. Do the following QA records furnish documentation concerning the quality & safety of items?			
Drawings:	✓		
Specifications:	✓		
Purchasing Documents:	✓		
Operating Logs:	✓		
Reviews:	✓		
Tests:	✓		
Audits:	✓		
Materials Analysis:	✓		
Personnel Qualifications:	✓		
Procedures:	✓		
Calibration procedures:	✓		
Nonconformances:	✓		
Corrective Actions:	✓		
2. Are records legible & complete?	✓		(PERMANENT) FINAL PAPERWORK COMPLETED
3. Are required records indexed & classified?	✓		
4. Are QA records & documents identifiable & retrievable?	✓		
5. Are QA records subject to storage, preservation & safekeeping?	✓		

INDIVIDUAL CRITERIA CHECKLIST (18 TITLES) FOR INTERNAL AUDITING OF JLS&A'S QA/QC PROGRAM

17. QA RECORDS, - RADIOLOGICAL

HEAD OF AUDIT REVIEW GROUP: J. FUZZELL
MANAGEMENT REVIEWER: R.D. DONELSON
DATE COMPLETED: 11-03-82

QUESTIONS:	YES	NO	COMMENTS
1. Do the following QA records furnish documentation concerning the quality & safety of items?			
Drawings:	✓		
Specifications:	✓		
Purchasing Documents:	✓		
Operating Logs:	✓		
Reviews:	✓		
Tests:	✓		
Audits:	✓		
Materials Analysis:	✓		
Personnel Qualifications:	✓		
Procedures:	✓		
Calibration procedures:	✓		
Nonconformances:	✓		
Corrective Actions:	✓		
2. Are records legible & complete?	✓		
3. Are required records indexed & classified?	✓		
4. Are QA records & documents identifiable & retrievable?	✓		
5. Are QA records subject to storage, preservation & safekeeping?	✓		

INDIVIDUAL CRITERIA CHECKLIST (18 TITLES)
FOR INTERNAL AUDITING OF JLS&A'S QA/QC PROGRAM

18. AUDITS.

HEAD OF AUDIT REVIEW GROUP: M. PAULS M. Pauls
MANAGEMENT REVIEWER: MF SHEPHERD M. Shepherd
DATE COMPLETED: 12/7/92

QUESTIONS:	YES	NO	COMMENTS
1. Are audits conducted in a prescribed manner?	✓		
2. Are audits scheduled?	✓		
3. Have qualifications for lead auditors & audit personnel been established?	✓		
4. Are preaudit conferences scheduled?	✓		
5. Are post audit conferences scheduled?	✓		
6. Is audit reporting & response subject to time restraints?	✓		
7. Are timely responses & followup actions as a result of audits verified?	✓		
8. Does the computer program effect this section?		✓	

NOVEMBER 9, 1992 - JLS&A YEARLY INTERNAL AUDIT - AUDIT CHECKLIST CONFERENCE

Postaudit Time: 2:30 PM.

Attendees:
JL Shepherd, MF Shepherd, DC Shepherd, JS Shepherd, Q Pho, D. Tran, V Towne, M Pauls, L Weiss, K Thoune, RN Donelson, P Shepherd, J Fuzzell, B Peabody, N Pho

Audit Step 1. Due Nov. 9, 1992, all head reviewers for each of the 18 point criteria sections will have evaluated their Audit Inspection List to determine if changes need to be made, for the list to be effective in an internal audit.

No objections or changes were submitted. 3 Sections had been completed.

Suggestion of Preaudit Conference: A yearly on-going audit, alternating 1 per month, 2 per month - to be determined at postaudit conference.

Notes taken by M Pauls.

MIP/mp
11/9/92