



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

June 16, 2023

Jared Bower
Chief Executive Officer
Robatel Technologies, Inc.
5115 Bernard Drive, Suite 304
Roanoke, VA 24018

SUBJECT: ROBATEL TECHNOLOGIES, INC. - U.S. NUCLEAR REGULATORY
COMMISSION INSPECTION REPORT NO. 71-0952/2023-201

Dear Jared Bower:

On April 25, 2023, through April 27, 2023, the U.S. Nuclear Regulatory Commission (NRC) conducted an announced onsite team inspection at Robatel Technologies Inc. (RT) in Roanoke, VA. The purpose of the inspection was to verify and assess the adequacy of RT's activities associated with the transportation of radioactive material to determine if they were performed in accordance with the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 71, "Packaging and Transportation of Radioactive Material," and RT's NRC-approved Certificate of Compliance (CoC) and Quality Assurance Program (QAP).

The purpose of the inspection was to verify and assess the adequacy of activities related to the design, procurement, repair, and any modification and maintenance for transportation packaging of radioactive material to determine if RT performed these activities in accordance with the requirements of 10 CFR Part 71, "Packaging and Transportation of Radioactive Material," and selected portions of 10 CFR Part 21, "Reporting of Defects and Noncompliance."

The inspection examined activities conducted under RT's NRC-approved QAP as they relate to public health and safety, and to confirm compliance with the Commission's rules and regulations and with the conditions of the applicable CoC. Within these areas, the inspection consisted of selected examination of quality assurance procedures, procurement and maintenance records and interviews with personnel. The enclosed report presents the results of this inspection.

Based on the results of this inspection, the NRC inspection team determined that two Severity Level IV (SLIV) violations of NRC requirements occurred. The NRC is treating these violations as non-cited Violations (NCVs), which is consistent with section 2.3.2 of the Enforcement Policy. The NRC inspection team describe these NCVs in the enclosed inspection report.

If you contest these violations, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington DC 20555-0001, with copies to: (1) the Director, Office of Nuclear Materials Safety and Safeguards; and (2) the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with 10 CFR 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

A handwritten signature in black ink that reads "Natreon J. Jordan". The signature is written in a cursive style with a large initial 'N' and 'J'.

Natreon Jordan, Chief
Inspection and Oversight Branch
Division of Fuel Management
Office of Nuclear Material Safety
and Safeguards

Docket No. 71-0952

Enclosure:
NRC Inspection Report No.
71-0952/2023-201

SUBJECT: ROBATEL TECHNOLOGIES, INC. - U.S. NUCLEAR REGULATORY
COMMISSION INSPECTION REPORT NO. 71-0952/2023-201

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***via email**

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**U.S. NUCLEAR REGULATORY COMMISSION
Office of Nuclear Material Safety and Safeguards
Division of Fuel Management**

Docket: 71-0952

Report.: 71-0952/2023-201

Enterprise Identifier: I-2023-201-0024

Certificate Holder: Robatel Technologies, Inc.

Location: Roanoke, VA

Inspection Dates: April 25, 2023, through April 27, 2023

Inspection Team: Earl Love, Senior Transportation and Storage Safety Inspector'
Team Leader
Jeremy Tapp, Transportation and Storage Safety Inspector
Nathan Audia, Safety Inspector

Approved By: Natreon Jordan, Branch Chief
Inspection and Oversight Branch
Division of Fuel Management
Office of Nuclear Material Safety
and Safeguards

Enclosure

U.S. NUCLEAR REGULATORY COMMISSION
Office of Nuclear Material Safety and Safeguards
Division of Fuel Management

EXECUTIVE SUMMARY

Robatel Technologies, Inc.
NRC Inspection Report 71-0952/2023-201

On April 25, 2023, through April 27, 2023, the U.S. Nuclear Regulatory Commission (NRC) conducted an announced onsite team inspection at Robatel technologies, Inc. (RT). The purpose of the inspection was to verify and assess the adequacy of activities related to design, procurement, repair, and any modification and maintenance for transportation packaging, RT-100 (NRC Certificate of Compliance 71-9365, Revision 2) to determine if RT performed these activities in accordance with the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 71, "Packaging and Transportation of Radioactive Material," and selected portions of 10 CFR Part 21, "Reporting of Defects and Noncompliance."

Based on the results of this inspection, the NRC inspection team assessed that the implementation of RT's quality assurance (QA) program did not meet certain NRC requirements in the areas of corrective action and instructions, procedures, and drawings. This resulted in two Severity Level IV (SLIV), non-cited violations (NCV) of NRC requirements. The violations are summarized in the sections below and described in detail in the Report Details section of this inspection report.

Quality Assurance Program

The team determined that RT conducted quality related activities on the transportation packaging in accordance with the Certificate of Compliance (CoC), as well as their Quality Assurance Manual (QAM), and had effective implementing procedures in place. (Section 1.1)

10 CFR Part 21

The team determined that RT conducted maintenance activities under a QA program that had provisions in place for reporting defects which could cause a substantial safety hazard, as required by 10 CFR Part 21. The team noted that RT's personnel were familiar with the reporting requirements of 10 CFR Part 21, and the RT personnel complied with 10 CFR 21.6, "Posting requirements." (Section 1.2)

Design Control

The team determined that for the RT-100, all the current design control related procedures contained adequate steps, detail, and the required independent reviews to ensure proper quality and to adequately implement the design control portion of the RT QA program consistent with the design commitments and requirements documented in the safety analysis report (SAR) and transportation packaging CoC No. 9365. (Section 1.3)

Maintenance Control

The team determined that the RT-100 packaging is subjected to routine inspection and periodic maintenance to ensure its compliance with the SAR and standards as required CoC 71-9365, Revision 2. The team concluded that RT failed to establish and maintain activities associated with QA documentation controls in accordance with their NRC approved QA program. The team identified one example of a SLIV NCV of NRC requirements; specifically, 10 CFR 71.133, "Corrective Action," for failing to adequately determine the condition (significant vs adverse) of a weld repair within in their corrective action program and if required, evaluate the cause and actions to prevent recurrence. (Section 1.4)

Procurement Control

The team determined that, except for one non-cited SLIV violation, materials, components, and contracted maintenance activities met purchase order requirements and RT maintenance procedures. The team also determined that procurement activities conform to the design commitments and requirements contained in the SAR and CoC. With respect to the violation, the team determined RT's review and approval of certain cask maintenance procedures, along with certification of personnel performing review and approval of an examination procedure, was not apparent. The team determined that this was a SLIV NCV of NRC requirements. Specifically, in violation of 10 CFR 71.150, "Instructions, procedures, and drawings," for RT's failure to confirm that important nondestructive examination activities will be satisfactorily accomplished. (Section 1.5)

Non-Conformance and Corrective Action

The team concluded that RT effectively implemented its nonconformance control and corrective action program and had adequate procedures in place to ensure compliance with the applicable regulations and QA program requirements. (Sections 1.6 and 1.7)

Audit Program

The team concluded that RT had an adequate audit program in place to schedule, evaluate, and document the results. The team determined that RT appropriately identified issues and documented them in the corrective action program as required. (Section 1.8)

REPORT DETAILS

1.0 Design, Fabrication, Testing, and Maintenance of Transportation Packagings (Inspection Procedure (IP) 86001)

1.1 Quality Assurance Program

1.1.1 Inspection Scope

The team of NRC inspectors reviewed how Robatel Technologies, Inc. (RT) performed work under its NRC-approved Quality Assurance Program (QAP), Quality Assurance Program Description (QAPD), Revision 4 dated 2021 and various quality implementing procedures to assess the effectiveness of their QAP implementation. The team conducted reviews of RT's quality procedures (QP) and work instructions to determine whether RT adequately controlled and implemented activities under their NRC-approved QAP and activities subject to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 71 regulations. The team reviewed procedures to verify if RT clearly defined and documented the quality program authorities and responsibilities and that the quality assurance organization functioned as an independent group. The team also reviewed procedures for the use of a graded approach for identifying important-to-safety (ITS) components. The team reviewed procedures and documents regarding training, qualification, and certification of personnel involved in quality activities. The team reviewed the following QAPDs and QPs:

- QAPD, Section 1.0, Organization, Revision 4
- QAPD, Section 2.0, Quality Assurance Program, Revision 4
- QAP, Section 1.0, Organization, Revision 6
- QAP, Section 2.0, Quality Assurance Program, Revision 6
- QAP, Section 17.0, Quality Assurance Records, Revision 6
- QP-02-01, Quality Training, Revision 6
- QP-05-01, Quality Assurance Procedures, Revision 3

1.1.2 Observations and Findings

The team assessed that RT had a QAP and implementing procedures in place that were generally effective in conducting activities in accordance with their transportation package Certificate of Compliance (CoC) for the RT-100 as well as their NRC-approved QAP. The team verified that the quality program authorities and responsibilities were clearly defined and documented, and the quality assurance organization functioned as an independent group. The team also verified that RT's quality assurance (QA) procedures discussed a graded approach for identifying ITS components quality categories. The team determined that for the sample of RT training records reviewed, that all personnel completed the required training.

No findings were identified.

Conclusions

The team concluded that RT had adequate quality assurance controls and independence related to other activities. The team also determined that RT conducts its

training of personnel and uses a graded approach for ITS components in accordance with their NRC approved QAP.

1.2 10 CFR Part 21

1.2.1 Inspection Scope

The team reviewed the 10 CFR Part 21 standard procedure QP-15-02, "10 CFR 21 Requirements," Revision 5 to verify whether provisions were in place for reporting defects that could cause a substantial safety hazard and to complete the required notification in a timely manner. The team interviewed personnel to verify if they were familiar with the implementing procedure. The team also verified that RT complied with 10 CFR 21.6, "Posting requirements."

1.2.2 Observation and Findings

The team assessed that RT has provisions in place for evaluating deviations and reporting defects that could cause a substantial safety hazard, as required by 10 CFR Part 21. The team noted that the 10 CFR Part 21 posting at RT's facility met the applicable requirements of 10 CFR Part 21.

No findings were identified.

1.2.3 Conclusions

The team determined that provisions are in place for reporting defects which could cause a substantial safety hazard, that personnel were familiar with the reporting requirements of 10 CFR Part 21; and that RT complied with 10 CFR 21.6, "Posting requirements."

1.3 Design Controls

1.3.1 Inspection Scope

The RT-100 package is a mature design. Since 2013, there has not been any new orders placed for this system which would require new fabrication. The team reviewed CoC No. 071-9365, Revision 2, and associated licensing drawings for the RT-100 transportation package. The inspection team noted by letter, dated August 29, 2022 (Agencywide Documents Access and Management System [ADAMS] Accession No. ML22262A264), as supplemented November 22, 2022 (ADAMS Accession No. ML22335A081), that RT applied to amend CoC No. 9365 for the Model No. RT-100 package to add activated hardware as new contents and provide flexibility to ship filters of varying activities.

1.3.2 Observations and Findings

The inspection team reviewed the design control section of the RT QAP and the RT implementing procedures that address design controls. This was done to verify that they were being properly implemented at RT for the RT-100 package design. The team reviewed procedure CG-EN-PR-201, "Design Control," Revision 1.

1.3.3 Conclusions

The inspection team determined that all the current design control related procedures contained adequate steps, detail, and the required independent reviews to ensure proper quality and to adequately implement the design control portion of the RT QAP.

1.4 Maintenance

1.4.1 Inspection Scope

The team reviewed selected records and interviewed personnel to verify that RT effectively implements a maintenance control program in accordance with their NRC-approved OAP, CoC conditions, and the requirements of 10 CFR Part 71 for the transportation of radioactive material.

1.4.2 Observations and Findings

The team reviewed CoC No. 071-9365, Revision 2, and associated licensing drawings for the RT-100 transportation package. Currently, there are four (4) RT-100 cask systems in service, of which, as the CoC holder, RT is responsible for performing maintenance on all four cask systems on an annual basis. The team noted that RT subcontracts maintenance activities to Engineered Products Division (EPD), a division of NFT, Carlsbad, NM. Final maintenance records are maintained at RT's corporate facility in Roanoke, VA. The team verified that EPD was audited and approved by RT to provide cask maintenance and welding services in accordance with the RT-100 SAR and RT approved QPs.

The team assessed RT's maintenance activities related to four (4) RT-100 packagings (Cask Model Nos. 1-4) performed at various intervals during fiscal year 2022 and 2023. The evaluation included a review of maintenance requirements identified in the SAR and CoC, RT's annual maintenance procedure, maintenance records and travelers, and inspector/examiner qualifications. Overall, RT used qualified spare part ITS components to conduct annual maintenance activities for the RT-100 packagings. The team noted that inspections were comprehensive and met acceptance criteria for inspection (e.g., visual weld) and examinations (e.g., liquid penetrant and helium leakage) identified within procedures. The team verified that RT appropriately inspected critical attributes of the cask, including primary and secondary lids, as well as the lifting yokes. The team also verified that maintenance personnel and technicians recorded the proper information on the applicable traveler, as required by RT's maintenance procedure, and that maintenance record data packages included records traceable to materials, measuring and test equipment, primary and secondary lid plate containment O-ring seal leak test reports, visual test reports, liquid penetrant test reports, spare parts (e.g., O-rings, and replacement quick disconnect valve) report, penetrant materials and helium gas certification, and equipment calibration records (e.g., gas leak standard, vacuum gauge, and load cell). The team reviewed the following documents:

- Cask Model RT-100 2019 Annual Maintenance Serial No. 1, including Weld Repair of Tie-Down Arm RT-100 – Cask # 1 – NCR 2014-017-NC05, Completion 01/28/2019
- Cask Model RT-100 2022 Annual Maintenance Serial No. 1, Completion Date: 01/10/2023 (Due: 11-15 DEC 2023)

- Cask Model RT-100 2023 Annual Maintenance Serial No. 2, Completion Date: 04/05/2023 (Completed: 27-31 MAR 2023)
- Cask Model RT-100 2022 Annual Maintenance Serial No. 3, Completion Date: 05/12/2022 (Due: 15-19 MAY 2023)
- Cask Model RT-100 2022 Annual Maintenance Serial No. 4, Completion Date: 07/21/2022 (Due: 24-28 JUL 2023)
- OP-14-01, Revision 4, "Inspection, Test and Operating Status Control"
- 2014-017-PR-MT-007, Revision 2, "Annual Maintenance Procedure for Transport Cask Model RT-100" Revision 2
- 2013-015-PR-CB-003, Revision 3, "Periodic and Maintenance Leak Test Procedure for Transport Cask Model RT-100"
- 2013-015-PR-CB-001 Revision 5, "Handling Procedure for RT-100 Transport Cask"
- 2014-017-PR-MT-005 Revision 0, "Liquid Penetrant Examination Procedure for Transport Cask Model RT-100"
- 2014-017-PR-MT-006 Revision 0, "Visual Inspection Procedure for Transport Cask Model RT-100"
- 2014-017-PR-MT-007 Revision 2, "Annual Maintenance Procedure"
- EPD-LT-RT100-1 Revision 0, "RT100 MSLT Procedure Qualification"
- EPD-LT-RT100-2 Revision 0, "RT-100 Periodic Maintenance Leak Testing"
- EPD-PT-ASME-1 Revision 2, "Liquid Penetrant Testing"
- EPD-VT-ASME-1, Revision 0, "Visual Testing"

The team noted applicability of RT's annual maintenance procedure includes annual maintenance of cask containment, lifting pocket welds, and lifting yoke. The team reviewed Cask Model No. 1 maintenance records and noted a weld repair was performed on the tie-down arm. The team noted that objective evidence could not be furnished that the condition was evaluated for appropriate actions. Specifically, RT's QAPD Section 16, "Corrective Action," requires that conditions adverse to quality (e.g., deficiencies, deviations, defective material) be documented in corrective action reports (CARs) to evaluate the cause and actions of significant conditions adverse to quality (SCAQ) to prevent recurrence. Contrary to this, although the weld deficiency was repaired, RT failed to disposition the condition (significant vs adverse) and if required, evaluate the cause and actions to prevent recurrence. The team determined that this was a violation of NRC requirements. Specifically, 10 CFR 71.133, "Corrective Action," states, in part, that the licensee, certificate holder, and applicant for a CoC shall establish measures to assure that conditions adverse to quality are promptly identified and corrected. In the case of a SCAQ, the measures must assure that the cause of the condition is determined, and corrective action is taken to preclude repetition. The identification of SCAQ, the cause of the condition, and the corrective action taken must be documented and reported to appropriate levels of management. The inspectors determined that this violation was more than minor because if left uncorrected it could prevent RT from being able to take appropriate action on safety-significant activities. The team dispositioned the violation in accordance with Section 2.3.2 of the NRC Enforcement Policy and characterized the finding as a SLIV non-cited violation (NCV). The team noted that RT entered this issue into their corrective action system for resolution as 2023-CAR-57. **(71-0952/2023-201-01)**

1.4.3 Conclusion

Overall, the team verified that the RT-100 packaging's is subjected to routine inspection and periodic maintenance to ensure its compliance with the SAR and standards as required CoC 71-9365, Revision 2. In addition, except for the SLIV NCV noted above, requirements of the RT QAP and procedures were satisfactorily implemented to direct required maintenance periods.

1.5 Procurement Controls

1.5.1 Inspection Scope

The team reviewed RT's procurement of ITS materials and services, which included the review of procurement documents, drawings and procedures, and receipt inspection records. The team reviewed the following section of RTs QAP for Packaging and Transportation of Radioactive Material 10 CFR 71 Subpart H, Revision 6, and implementing procedures:

- Section 7.0, "Control of Purchased Material, Equipment, and Services"
- QP-04-01, "Procurement Document Control," Revision 8
- QP-07-01, "Supplier Control," Revision 6
- QP-07-04, "Robatel Technologies Spare Parts Receipt Inspection," Revision 1

The procedures were reviewed to verify if they were properly implemented. Additionally, the team reviewed RT's approved suppliers list (ASL) dated April 2023, to determine if materials and services were being procured from qualified suppliers, and that the suppliers were being acceptably qualified.

1.5.2 Observations and Findings:

The team selected a sample of qualified suppliers and ITS materials for review. The team reviewed the procurement documents specific to the RT-100 spare parts available for use during cask maintenance. The team selected a sample of qualified suppliers and ITS materials for review. This sample included Escudier, which supplied O-rings, and Robatel Industries (RI), Genas France, the fabricator of the RT-100 packagings. The team reviewed RT purchase order (PO) No. 173, dated February 2020, to verify the adequacy and traceability of the Secondary Lid Outer O-Ring, which is designated as an ITS, category A (ITS-A) component. The team verified that the component was traceable through procurement specifications, standards, and acceptance criteria, including inspection and test records for acceptability. The team also observed that various ITS-A commercial grade dedication plans, including critical characteristics and associated activities performed by RI and received and accepted by RT, met design requirements.

The team reviewed RT's PO No. 185, dated 05/21/2021, issued to NFT-EPD, LLC for performance of annual cask maintenance services for RT-100 cask nos. 1, 2, 3, and 4 in accordance with the RT-100 SAR and RT procedures. The team noted, PO No. 185, invoked a restriction that procedures and personnel used on cask maintenance work to be reviewed and approved by RT, prior to the work being performed. Further, RT's procurement control QP (No. QP-04-01) requires RT supplier documentation approval. Contrary to these requirements, RT's review, and approval of certain cask maintenance EPD examination procedures were not documented. In addition, documentation of qualification and certification of nondestructive examination Level III personnel

performing review and approval of helium leak testing procedure (No. 2013-015-PR-CB-003) utilized during RT-100 casks annual maintenance was not apparent. The team determined that this was a violation of NRC requirements. Specifically, 10 CFR 71.150, "Instructions, procedures, and drawings," states, in part, that the licensee, certificate holder, and applicant for a CoC shall prescribe activities affecting the quality by documented instructions, procedures or drawings of a type appropriate to the circumstances, and shall require that these instructions, procedures, and drawings be followed. The team determined that this violation was more than minor because if left uncorrected it could prevent RT from confirming that important NDE activities will be satisfactorily accomplished. The team dispositioned the violation in accordance with Section 2.3.2 of the NRC Enforcement Policy and characterized the finding as a SLIV NCV. The team noted that RT entered this issue into their corrective action system for resolution as 2023-CAR-59. **(71-0952/2023-201-02)**

1.5.3 Conclusion:

The team determined that except for the SLIV NCV noted above, that RT's material procurement controls were adequate, and RT was effectively implementing their procurement program.

1.6 Nonconformance Controls

1.6.1 Inspection Scope

The team reviewed selected records and interviewed personnel to verify that RT effectively implemented a nonconformance control program in accordance with the requirements of 10 CFR Part 71 and RT's nonconformance QP. The team requested the nonconformance reports (NCRs) issued since the last NRC inspection in 2018 for review to verify that the NCRs were identifiable, traceable, and that the disposition of the nonconformance was adequate. The team reviewed a sample of NCRs issued since that time to evaluate if the disposition was appropriate, adequately performed as necessary, and properly closed out in accordance with the approved quality procedure.

The team reviewed the following section of RT's QAP for Packaging and Transportation of Radioactive Material 10 CFR 71 Subpart H, Revision 6, and implementing procedures:

- Section 15.0, "Nonconforming Materials, Parts, or Components"
- QP-15-01, "Nonconforming Items," Revision 8

In addition, the team reviewed the requirements for the identification and segregation of non-conforming components, as applicable, and toured the facility to verify that selected non-conforming items met the requirements in QP-15-01 and were adequately controlled, as applicable.

1.6.2 Observations and Findings

The team assessed that RT adequately dispositioned and, if applicable, closed each NCR reviewed in accordance with the requirements of QP-15-01

No findings were identified.

1.6.3 Conclusions

The team concluded that RT effectively implemented its nonconformance control program and had adequate procedures in place to ensure compliance with the applicable regulations and QAP requirements.

1.7 Corrective Actions

1.7.1 Inspection Scope

The team reviewed selected records and interviewed personnel to verify that RT effectively implemented a corrective action program (CAP) in accordance with the requirements of 10 CFR Part 71 and RT's corrective action procedures. The team reviewed the CARs written since the last inspection in 2018 regarding transportation packagings to verify RT completed corrective actions for identified deficiencies in a technically sound and timely manner. The team included a review of the CARs that were opened based on the issues identified during the previous 2018 inspection.

The team reviewed the following section of RT's QAP for Packaging and Transportation of Radioactive Material 10 CFR 71 Subpart H, Revision 6, and implementing procedures:

- Section 16.0, "Corrective Action"
- QP-16-01, "Corrective Action System," Revision 8

1.7.2 Observations and Findings

The team assessed that RT had adequate procedures and controls in place for identifying and writing CARs, documenting corrective action(s) taken, performing causal analyses as necessary, documenting corrective actions and actions taken to prevent recurrence as applicable, performing CAR closure verification, and tracking CARs to closure.

No findings were identified.

1.7.3 Conclusions

The team concluded that, except for the SLIV NCV identified in Section 1.4.2 (71-0952/2023-201-01), RT effectively implemented its CAP and had adequate procedures in place to ensure compliance with the applicable regulations and QAP requirements.

1.8 Audits

1.8.1 Inspection Scope

The team reviewed RT's audit program to determine if RT scheduled, planned, and performed internal and external audits in accordance with the applicable regulations and QAP requirements. The team also reviewed the qualifications, training records, and annual evaluations for RT lead auditors to determine if they met the procedure requirements.

The team reviewed the following section of RT's QAP for Packaging and Transportation of Radioactive Material 10 CFR 71 Subpart H, Revision 6, and implementing procedures:

- Section 18.0, "Audits"
- QP-18-01, "Lead Auditor Qualification," Revision 3
- QP-18-02, "Internal Audits and Assessments," Revision 6
- QP-18-03, "Supplier Audits," Revision 7

The team reviewed a sample of audit schedules since 2018 to verify that all 18 QAP criteria were audited, as applicable, each year and completed. The team also reviewed the current ASL list to verify that approved ITS-A suppliers were being audited on the required triennial frequency. The team reviewed and assessed several of the internal audits completed since the last inspection to determine if they were performed in accordance with QPs and whether they used auditors independent of the areas being reviewed. In addition, if there were identified deficiencies, whether RT adequately addressed these deficiencies within the CAP. The team reviewed the current procedure for the qualification of audit personnel and reviewed a sample of lead auditor qualification records to determine if they met the applicable requirements, including those stated in QP-18-01.

1.8.2 Observations and Findings

Overall, the team assessed that for the audits sampled, RT conducted them with qualified and certified personnel and identified observations and findings in the audit reports reviewed. The team noted that RT's internal and external audit implementing procedures are in place and used effectively. The team noted that external audits were performed on the required 3-year periodicity for ITS Category A suppliers.

No findings were identified.

1.8.3 Conclusion

The team concluded that RT had an adequate audit program in place to schedule, evaluate, and document the results. The team determined that RT appropriately identified issues and documented them in the CAP as required.

2.0 Entrance and Exit Meeting

On April 25, 2023, the NRC inspection team discussed the scope of the inspection during an entrance meeting with members of RT staff. The team completed the inspection and conducted an inspection exit meeting on April 27, 2023. Section 1 of the attachment to this report shows the attendance for the entrance and exit meetings.

ATTACHMENT

1. ENTRANCE/EXIT MEETING ATTENDEES AND INDIVIDUALS INTERVIEWED

<u>Name</u>	<u>Title</u>	<u>Affiliation</u>	<u>Entrance</u>	<u>Exit</u>
Earl Love	Team Leader, Senior Transportation & Storage Safety Inspector	NRC	X	X
Jeremy Tapp	Transportation & Storage Safety Inspector	NRC	X	X
Nathan Audia	Safety Inspector	NRC	X	X
Jared Bower	Chief Executive Officer	RT	X	X
Gunars Burvis	Quality Assurance Manager	RT	X	X
Abdulsalam Shakhathreh	Engineering Manager	RT		

2. INSPECTION PROCEDURES (IP) and GUIDANCE DOCUMENTS USED

IP 86001	“Design, Fabrication, Testing, and Maintenance of Transportation Packagings”
NUREG/CR-6314	“Quality Assurance Inspections for Shipping and Storage Containers”
NUREG/CR-6407	“Classification of Transportation Packaging and Dry Spent Fuel Storage System Components According to Importance to Safety”

3. LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

<u>Item Number</u>	<u>Status</u>	<u>Type</u>	<u>Description</u>
71-0952/2023-201-01	Closed	NCV	Failure to evaluate an adverse condition for appropriate corrective actions
71-0952/2023-201-02	Closed	NCV	Failure to comply with procurement control procedure

4. LIST OF ACRONYMS USED

ADAMS	Agencywide Documents Access and Management
ASL	Approved Suppliers List
CAP	Corrective Action Program
CAR	Corrective Action Report
CFR	Code of Federal Regulations
CoC	Certificate of Compliance
EPD	Engineered Products Division
IP	Inspection Procedure
ITS	Important to Safety
ITS-A	Important to Safety – Category A
NCR	Nonconformance Report

Attachment

NCV	Non-Cited Violation
NRC	Nuclear Regulatory Commission
PO	Purchase Order
QA	Quality Assurance
QAP	Quality Assurance Program
QAPD	Quality Assurance Program Description
QP	Quality Procedure
RI	Robatel Industries, Genas France
RT	Robatel Technologies Inc., Roanoke VA
SAR	Safety Analysis Report
SCAQ	Significant Condition Adverse to Quality
SLIV	Severity Level IV

5. DOCUMENTS REVIEWED

Certificate holder and maintenance documents reviewed during the inspection were specifically identified in the Report Details above.