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

October 12, 2023

Richard Wassenaar
Director, Regulatory and EHS
Nordion (Canada) Incorporated
447 March Road
Ottawa, Ontario K2K1X8
Canada

SUBJECT: NORDION (CANADA) INC. - U.S. NUCLEAR REGULATORY COMMISSION INSPECTION REPORT NO. 71-0703/2023-201

Dear Richard Wassenaar:

On June 19, 2023, through June 20, 2023, the U.S. Nuclear Regulatory Commission (NRC) conducted an announced onsite team inspection at Nordion (Canada) Incorporated (Nordion) near Ottawa, Ontario Canada. The inspection team continued the inspection activities with an in-office review while the team waited for Nordion to provide additional information on their quality assurance program (QAP) changes. The enclosed report presents the results of this inspection. The team discussed the preliminary results of this inspection with you and other Nordion representatives on June 20, 2023, and completed the inspection activities on August 3, 2023. The team leader exited on August 29, 2023 since there were no changes after the review of the additional information.

The purpose of the inspection was to verify and assess the adequacy of activities related to Nordion's transportation 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." The inspection team verified that the transportation packagings for which Nordion is the registered user, comply with their user only quality assurance program in the areas of procurement, repair, and maintenance, as applicable.

The inspection scope included observations of maintenance activities, documentation reviews, and interviews with personnel to determine that the transportation packaging Nordion uses was in accordance with the commitments and requirements specified in the safety analysis report for packaging, and Nordion's NRC-approved QAP requirements. The inspection team limited the inspection activities to specific sections of the inspection procedure because of Nordion's user-only status for transportation packagings.

Based on the results of this inspection, the NRC inspection team determined that one Severity Level IV violation of NRC requirements occurred because Nordion did not submit a description of a change that reduced commitments to their NRC-approved QAP. The NRC is treating this violation as a Non-Cited Violation (NCV), which is consistent with section 2.3.2 of the NRC Enforcement Policy. The NRC inspection team describes this NCV in the enclosed inspection report.

If you contest this violation, 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. In accordance with 10 CFR 2.390, "Public inspections, exemptions, requests for withholding," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room (PDR) or from the Publicly Available Records component of the NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC website at http://www.nrc.gov/reading-rm/adams.html. The PDR is open by appointment. To make an appointment to visit the PDR, please send an email to PDR.Resource@nrc.gov or call 1-800-397-4209 or 301-415-4737, between 8 a.m. and 4 p.m. eastern time (ET), Monday through Friday, except Federal holidays.

Sincerely,

Signed by Rivera-Varona, Aida
on 10/12/23

Aida Rivera-Varona, Chief
Inspection and Oversight Branch
Division of Fuel Management
Office of Nuclear Material Safety
and Safeguards

Docket No. 71-0703

Enclosure:
NRC Inspection Report No.
71-0703/2023-201

SUBJECT: NORDION CANADA, INC. - U.S. NUCLEAR REGULATORY COMMISSION INSPECTION REPORT NO. 71-0703/2023-201

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

Docket:	71-0703
Report.:	71-0703/2023-201
Enterprise Identifier:	I-2023-201-0042
Certificate User:	Nordion Canada, Incorporated
Facility:	Nordion (Canada)
Location:	Ottawa/Kanata, Ontario Canada
Inspection Dates:	June 19, 2023, through August 3, 2023
Inspection Team:	Marlone Davis, Senior Transportation and Storage Safety Inspector, Team Leader Matthew Learn, Senior Transportation and Storage Safety Inspector Azmi Djapari, Transportation and Storage Safety Inspector (Trainee)
Approved By:	Aida Rivera-Varona, 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

Nordion Canada, Inc.
NRC Inspection Report 71-0703/2023-201

On June 19, 2023, through June 20, 2023, the U.S. Nuclear Regulatory Commission (NRC) conducted an announced onsite team inspection at Nordion Canada (general licensee) near Ottawa, Canada. The inspection team continued the inspection activities with an in-office review while the team researched the history of the NRC's approval of the quality assurance program description (QAPD) since Nordion requested a full scope review, and later withdrew the application while making changes to their NRC approved QAPD. The team discussed the preliminary results of this inspection on June 20, 2023, and completed the inspection activities on August 3, 2023.

The purpose of the inspection was to verify and assess the adequacy of activities related to Nordion's (licensee) transportation 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." The inspection team verified that the transportation packagings for which Nordion is the registered user, comply with their user only quality assurance program in the areas of procurement, testing, and maintenance, as applicable.

The inspection scope included observations of maintenance activities, documentation reviews, and interviews with personnel to determine that the transportation packaging the licensee uses was in accordance with the commitments and requirements specified in the safety analysis report for the packaging, and the licensee's NRC-approved quality assurance program (QAP) requirements. The inspection team limited the inspection activities to specific sections of the inspection procedure because of the licensee's user-only status.

Quality Assurance Program

The team determined that the licensee conducted quality related activities on the transportation packaging in accordance with their NRC approved quality assurance program (QAP). However, the licensee made changes to the QAPD and overall program that reduced commitments in their QAP as approved by the NRC (section 1.1).

10 CFR Part 21

The team determined that provisions are in place for reporting defects which could cause a substantial safety hazard, personnel were familiar with the reporting and posting requirements of 10 CFR Part 21 although the posting requirements are not applicable to Nordion Canada since the facility is outside the United States and has a limited scope user only QAP with no fabrication activities (section 1.2).

Maintenance and Testing

The team determined, for the items selected for observation and review that the licensee performed maintenance and testing in accordance with approved safety analysis report for packaging (SARP), written procedures, and specifications, as applicable (section 1.3).

Procurement

The team determined that maintenance materials, components, and other equipment received by the licensee for maintenance activities met procurement specifications, and specifications conform to the requirements in the SARP (section 1.4).

Non-Conformance and Corrective Action

The team concluded that the licensee effectively implemented its nonconformance and corrective action control programs and has adequate procedures in place to ensure compliance with applicable regulations and quality assurance requirements (section 1.5).

Personnel Training and Quality Assurance Oversight

The team determined that the licensee had trained and qualified individuals performing activities affecting quality and that Nordion management provided appropriate oversight of quality related activities, as applicable (section 1.6).

Audit Program

The team determined for the most part that the licensee performed internal audits as scheduled of their QAP for the transportation packagings being used and resolved deficiencies if identified in a timely manner (section 1.7).

REPORT

DETAILS

1.0 Applicable portions of Inspection Procedure 86001 - Design, Fabrication, Testing, and Maintenance of Transportation Packagings

1.1 Quality Assurance Program

1.1.1 Inspection Scope

The NRC inspection team reviewed the licensee's limited scope NRC-approved quality assurance program and associated implementing procedures to verify that the licensee was conducting activities as described in the NRC approved quality assurance program description and two other quality plans that work together to provide an overall quality assurance program (QAP) for transportation packaging activities. The team also reviewed the QAP authorities and responsibilities to determine if they were clearly defined and documented, and the quality assurance organization functioned as an independent group. The team reviewed the following documents:

- IN/QA 0224 Z000, "Radioactive Material Transport Package Quality Plan," Revision 12
- IN/QA 0562 A000, "Sealed Source Quality Plan," Revision 8
- QSF-00, "Quality Plan," Revision 35
- QAG-03, Management Review, Revision 17
- QAP AP-45, "Change Control Procedure," Revision 30

Additionally, the team reviewed the QAP to determine if changes were made and if so, whether Nordion performed those changes in accordance with the requirements of 10 CFR 71.106, as applicable.

1.1.2 Observation and Findings

The team assessed that the licensee currently has an adequate QAP that included applicable implementing procedures in place to conduct effective quality activities in accordance with the transportation packaging safety analysis report, and 10 CFR Parts 21 and 71 requirements. The team verified that the licensee clearly defined and documented the quality program authorities and responsibilities and that the quality assurance organization functioned as an independent group as described in the licensee's quality plans.

However, the team identified that the licensee made changes to their NRC-approved QAP description that reduced the commitments without receiving NRC review and approval prior to implementation.

The team noted that in March of 2012, the licensee applied for a limited scope QAP (Agencywide Documents Access and Management System [ADAMS] Accession number ML12082A163) and received NRC approval of the QAP description as documented in a letter dated July 19, 2012 (ML12213A593). The NRC issued the QAP limited condition approval to the licensee for use of radioactive material packages under approval number 0703 with four conditions on NRC FORM 311 (FORM), revision 10. The NRC later revised the QAP approval FORM to remove expiration dates because the NRC amended regulations that establish requirements that would allow certain changes to

QAPs to be made if those changes would not reduce commitments such as changes to those that involve administrative improvements, clarifications, and editorial changes. The team noted that there were no other NRC approvals since the initial limited condition approval in 2012 although the licensee had submitted a new full scope QAP in 2016 and later withdrew that QAP in 2018.

Therefore, in the current approval the licensee referenced two quality plans as described above INQA 0224-Z000 and INQA 0562 A000, which described how the licensee would implement the 10 CFR Part 71, subpart H criteria that the licensee identified in their QAP description. The team identified two examples where the licensee made changes to the QAP that reduce commitments following a review of their current quality plans.

For the first example, the team identified that for the planned and periodic audits of all aspects of the QAP moved from a 1 year to a 3-year frequency. The team noted that the licensee provided the internal audit frequency for the Quality Compliance and Environment, Health and Safety (EHS) Audit schedules in two procedures CPM 7-03, “Internal Audit Program,” Revision 15 and a newer procedure QAP-AP-77, “Nordion Internal Quality Audit Program,” Revision 2. CPM 7-03 required audits of select specific quality assurance criteria on a minimum frequency of “yearly” as outlined in Appendix 1, “Qualifying Compliance Audit Schedule – Internal Frequency.” However, during the creation of QAP-AP-77, the licensee modified the frequency of audits from annually to triennially as outlined in Appendix A, “Internal Quality Audit Requirements.” Additionally, Nordion's Quality Manual QSF-00, Revision 35 revised its reference from CPM 7-03 to QAP-AP-77, but the transportation specific audits remained in CPM 7-03. A review of the schedules showed that the licensee performed internal audits every three-years. The team noted that this was a reduction in commitments.

For the second example, the team identified that for specific sections referenced in the approved QAP description (e.g., criteria 12 and 14), the commitments made in the approval no longer match the quality plan implementation of the current program. In one instance for inspection test records, the licensee now maintains an electronic database of maintenance records that contain results of the activities, but the database did not include all the items listed in the in the QAP descriptions such as the equipment and material used, signature of personnel conducting the acceptance activity, and date of activity. The team noted that this was a reduction in commitments and did not reflect the licensee’s current practices.

The team also noted that the licensee changed the implementing quality plan reference in the approved QAP description from INQA 0562 A000 to QSF-00 and that there was no configuration control associated with any changes made to the document (i.e., no revision number or change bars to identify changes). The team noted that the licensee missed opportunities to identify these issues during the biennial submittals. The team determined that this was a violation of 10 CFR 71.106, “Changes to quality assurance program.”

As required by 10 CFR 71.106(a) it states, in part, that each quality assurance program approval holder shall submit a description of a proposed change to its NRC-approved quality assurance program that will reduce commitments in the program description as approved by the NRC. The quality assurance program approval holder shall not implement the change before receiving NRC approval.

Contrary to, as of July 31, 2023, the QAP approval holder (Nordion) did not submit a description of proposed changes to its NRC-approved QAP that reduced commitments in the program description as approved by the NRC and implemented those changes before receiving NRC approval. Specifically, Nordion reduced its commitments for audits, and specific sections that do not reflect the current practice in the quality program description such as inspection, testing, and operating status as approved by the NRC and implemented those changes before receiving prior NRC approval.

The team assessed the significance of the violation using the NRC Enforcement Policy and Enforcement Manual. The team dispositioned the violation using the traditional enforcement process in section 2.3 of the Enforcement Policy. The team determined that the violation was of more-than-minor safety significance because it was like an example contained in Inspection Manual chapter 0617, "Vendor and Quality Assurance Implementation Inspection Reports," appendix E, "Minor Examples of Vendor and QA Implementation Findings," example 3.b. The team characterized the violation as a Severity Level IV violation in accordance with the NRC's Enforcement Policy section 6.0, violation example 6.5.d.1. Nordion entered the issue into its corrective action program (CAP) under corrective and preventive action (CAPA) number 230601. The team assessed that because this violation was of low safety significance and was entered into the licensee's CAP, and the issue was not repetitive or willful, it is being treated as an NCV, consistent with section 2.3.2.a of the Enforcement Policy **(71-0703/2023-201)**.

1.1.3 Conclusion

The team determined that the licensee conducted quality related activities on the transportation packaging in accordance with their NRC approved QAP. However, the licensee made changes to the QAP description and overall program that reduced commitments in their QAP as approved by the NRC.

1.2 10 CFR Part 21

1.2.1 Inspection Scope

The team reviewed the licensee's procedure, SE-EHS-009, "Regulatory Reporting of EHS Events," Revision 10 to verify if 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 requested a list of 10 CFR Part 21 evaluations and notifications associated with the transportation activities and interviewed personnel to verify if they were familiar with the implementing procedure. The team also verified if the licensee complied and understood whether they needed to meet the posting requirements identified in 10 CFR 21.6, "Posting requirements" since the facility was outside the United States.

1.2.2 Observation and Findings

The team assessed that the licensee 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 reviewed nonconformance records and corrective and preventive actions from the previous 5 years. There were no notifications made to the NRC associated with 10 CFR Part 21.

Additionally, the team discussed the provisions of Part 21 with the licensee and noted that they are not subject to the 10 CFR Part 21.6 requirements. Although, the licensee was aware of the requirements and stated that they would promptly report defects and noncompliance to the NRC as captured in their implementing procedure.

No findings of significance were identified.

1.2.3 Conclusions

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

1.3 Maintenance and Testing

1.3.1 Inspection Scope

The team reviewed selected records and interviewed personnel to verify that the licensee effectively implemented a maintenance control program in accordance with their NRC approved QAP, the applicable SARPs, and the requirements of 10 CFR Part 71 for the transportation of radioactive material. The team performed a review on maintenance activities related to the F-127, F-168, and F-231 radioactive transportation packaging for the last three maintenance cycles. The team evaluated annual maintenance activities conducted at the Nordion Canada facility. The evaluation included a review of maintenance requirements identified in the SARP, maintenance procedures, completed maintenance records (electronic), and personnel and qualification training records. The team also observed maintenance activities being performed on the F-168.

The team reviewed the following maintenance implementing procedures:

- IN/OP-0019 Z000, “Radioactive Material Packaging Inspection and maintenance Procedure,’ Revision 14
- CO-MD/IT-0012, “Inspection and Maintenance of the F-168 Type B Transport,” Revision 1,
- CO-MD/IT-0001, “F-127 Noncontaminated Transport Packaging Inspection and Test,” Revision 16,

Measuring and Test Equipment

The team reviewed the control of measuring and test equipment (M&TE) program to evaluate how the licensee identified, specified, and controlled tools and equipment in accordance with their quality assurance program, implementing procedures, and regulatory requirements. The team selected a sample of the M&TE used during recent maintenance and testing activities. The sample included a review of travelers that identified the use of specific M&TE that the team selected such as a pressure gauge, and a torque wrench. The team reviewed the calibration records to verify calibration dates, testing standards, and traceability of the associated M&TE. The team reviewed the following quality standard procedures:

- CP-001,"Calibrartion Master Plan,” Revision 1,

1.3.2 Observation and Findings

Based on a review of the maintenance records and procedures, the team assessed that the licensee used appropriate maintenance materials, tools, and equipment to conduct the required maintenance activities for the radioactive material transport packagings. The team verified that the inspections met acceptance criteria for tests identified in the container management system. The team also verified that maintenance personnel and technicians recorded the proper information on the applicable forms and data sheets as defined and required in the licensee verification checklist and maintenance procedures. The team assessed that the maintenance conducted satisfied the requirements identified in the SARP and Certificate of Compliance (CoC).

Additionally, the team assessed that the licensee used M&TE within their rated capacities and sensitivities as documented in calibration records. The team also assessed that the licensee established controls for M&TE in accordance with their quality procedure requirements, industry standards and regulatory requirements.

No findings of significance were identified.

1.3.3 Conclusions

The team determined, for the items selected for observation and review that the licensee performed maintenance and testing in accordance with approved SARP, written procedures, and specifications, as applicable.

1.4 Procurement Control

1.4.1 Inspection Scope

The inspectors reviewed the licensee's processes that addressed procurement, including receipt inspection, and traceability of material, as applicable. The team reviewed selected drawings and records and interviewed selected personnel to verify that the licensee's procurement specification for maintenance materials, and inspections performed at the licensee's facility met requirements contained in the SARPs and written procedures. The team reviewed procedures, receipt inspection records, and sampled purchased orders (POs). The following is a list of documents reviewed:

- IN/QA 0224 Z000, "Radioactive Material Transport Package Quality Plan," Revision 12
- IN/QA 0562 A000, "Sealed Source Quality Plan," Revision 8
- QSF-00, "Quality Plan," Revision 35

1.4.2 Observation and Findings

Overall, the team assessed that the licensee had adequate control of the procurement process components selected and reviewed. The team determined that the licensee procured components consistent with design requirements and their QAP implementing procedures. The licensee's material traceability, procurement, and receipt inspection controls were adequate. The team assessed that the POs were adequate and specified the applicable criteria and requirements including Part 21.

No findings of significance were identified.

1.4.3 Conclusions

The team determined that materials, components, and other equipment received by the fabricator met the procurement specifications, and the specifications conform to the design commitments and requirements contained in the SARP and CoC.

1.5 Nonconformance and Corrective Action Program

1.5.1 Inspection Scope

The team reviewed a sample of nonconformance records and corrective actions to verify that the licensee effectively implemented a nonconformance control program and had taken adequate corrective actions in accordance with their approved quality assurance program. The team reviewed Non-Conformance Records and CAPAs from the previous 5 years and discussed the nonconformance and corrective action process with the licensee's staff.

The team reviewed the following quality procedures:

- 040701.SOP, "Handling of Non-Conforming Product and Related Material," Revision 25
- QAP AP-04, "Corrective and Preventive Action," Revision 32
- QAP AP-62, "Risk Assessment, Root Cuse and Corrective Action Guide," Revision 7

1.5.2 Observation and Findings

Overall, the team assessed that the licensee had adequate nonconformance and CAP programs in place to resolve deficiencies if identified. The team assessed that the licensee appropriately identified issues and implemented corrective actions in a time frame commensurate with their safety significance. The team verified that the licensee completed corrective actions for identified deficiencies and nonconformances in a technically sound and timely manner.

No findings of significance were identified.

1.5.3 Conclusions

The team concluded that the licensee effectively implemented its nonconformance and corrective action control programs and has adequate procedures in place to ensure compliance with applicable regulations and QAP requirements.

1.6 Personnel Training and Oversight

1.6.1 Inspection Scope

The team reviewed selected records and procedures, interviewed selected personnel, and observed selected activities affecting the safety aspects of the packaging to verify that the licensee properly trained and qualified individuals performing activities affecting quality and that the Management and the quality assurance staff provided appropriate

oversight. The team also reviewed the following training document for the overall program QAP AP-47, “Training Program and Management System,” Revision 20.

1.6.2 Observation and Findings

The team assessed that the licensee had trained and qualified individuals who performed activities affecting quality and in accordance with written quality procedures. The team assessed the licensee’s training and qualifications as a part of each applicable section of this inspection report see sections 1.1 (quality assurance), 1.2 (maintenance) and 1.7 (audits).

No findings of significance were identified.

1.6.3 Conclusions

The team determined that the licensee had trained and qualified individuals performing activities affecting quality and that Management provided appropriate oversight of quality related activities, as applicable.

1.7 Audits

1.7.1 Inspection Scope

The team reviewed the licensee’s internal audit program to verify that the licensee scheduled, planned, and performed audits in accordance with their QAP. The team reviewed the audit results to determine if the licensee identified deficiencies and addressed these deficiencies within their CAP. The team reviewed the following documents:

- CPM 7-03, “Internal Audit Program,” Revision 15
- QAP AP-77, “Nordion Internal Quality Audit Program,” Revision 2
- QSF-00, Revision 35.

The team reviewed the licensee's quality assurance 2019 through 2023 audit schedules and selected internal audit reports to review the licensee’s transportation packaging program in the areas related to its NRC-approved quality assurance program. The team also sampled qualified lead auditor names from the internal audit documents reviewed and requested the auditor qualification records for those individuals. The team did not review external audits as a part of this inspection.

1.7.2 Observation and Findings

The team assessed that the internal audits complied with the quality procedure and contained the necessary information needed for the audits such as identified corrective actions, audit conclusions, and approvals. The team verified through the review of meeting records that the licensee’s management reviewed the internal audits in accordance with QAP AP-77.

The team assessed that the licensee qualified the lead auditors in accordance with the requirements in CPM 7-03 from the sample selected.

The team assessed that, in most case that the licensee appropriately identified issues and implemented corrective actions in a time frame commensurate with their safety significance if identified during the audits.

No findings of significance were identified.

1.7.3 Conclusions

The team determined that the licensee performed internal audits as scheduled of their QA programs and activities affecting the safety aspects of the transportation packaging and resolved deficiencies if identified in a timely manner.

2.0 Entrance and Exit Meeting

On June 19, 2023, the NRC inspection team discussed the scope of the inspection during an entrance meeting with the Nordion staff. On June 20, 2023, the NRC inspection team discussed the preliminary results and observations during an onsite debrief meeting with the Nordion staff. The team continued the inspection activities with an in-office review while the team waited for Nordion to provide additional information on the corrective actions and a review of the history of the QAPD approval. Once the team received the additional information, the team completed the inspection activities on August 3, 2023. The team leader exited on August 29, 2023 since there were no changes after the review of the additional information. 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

Name	Title	Affiliation	Entrance	Debrief	Exit
Marlone Davis	Team Leader	NRC/DFM	X	X	X
Matthew Learn	Senior Safety Inspector	NRC/DFM	X	X	
Azmi Djapari	Safety Inspector (Trainee)	NRC/DFM	X	X	
Greg Fulton	Manager, Radiation Protection and Nuclear Transportation	Nordion	X	X	X
Richard Wassenaar	Director, Regulatory and EHS	Nordion	X	X	X
Erin Coleman	Director, Quality	Nordion	X	X	

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

Item Number	Status	Type	Description
71-0703/2023-201-01	Closed	NCV	Failure to submit a change to QAP that reduced commitments

4. LIST OF ACRONYMS USED

ADAMS	Agencywide Documents Access and Management System
CAP	Corrective Action Program
CAPA	Corrective and Preventive Action
CFR	Code of Federal Regulations
CoC	Certificate of Compliance
IMC	Inspection Manual Chapter
IP	Inspection Procedure
ITS	Important to Safety
M&TE	Measuring and Test Equipment
NCR	Nonconformance Report
NCV	Non-Cited Violation
NRC	Nuclear Regulatory Commission
PO	Purchase Order
QA	Quality Assurance
QAP	Quality Assurance Program
QAPD	Quality Assurance Program Description
SARP	Safety Analysis Report for Packagings

5. DOCUMENTS REVIEWED

Licensee's documents reviewed during the inspection were specifically identified in the Report Details above.