Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2881

November 3, 1999

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

Enclosed is Central Laboratories & Field Testing Services' response to NRC Inspection Report No. 99901341/99-201, Notice of Nonconformance No. 99901341/99-01-01. Corrective actions have been identified and completed.

If there are any questions regarding this response, you may contact me at (423) 697-4317 or Sammy R. Walker, QA Manager, (423) 697-4044.

Sincerely,

Richard L. Morley

Richard L. Morley, Manager
Central Laboratories & Field Testing Services

cc (Enclosures):
Theodore R. Quay, Chief, IQMB
Division of Inspection Program Management
Office of Nuclear Reactor Regulation

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**CENTRAL LABORATORIES & FIELD TESTING SERVICES (CL&FTS)**
**REPLY TO NOTICE OF NONCONFORMANCE**
**(NONCONFORMANCE 99901341/99-01-01)**

**ITEM A.1**

Reason For Nonconformance:

CL&FTS management failed to adequately track and prioritize progress/status of the cited Nonconformance Reports (NCRs).

The cited NCRs had been reviewed and approved by management in regards to evaluation of impact to quality but not all remaining corrective actions had been closed.

Corrective Action:

Complete remaining corrective actions and close the cited NCRs.

Recurrence Control:

1. The CL&FTS Management Team will review any NCR older than six months at the regularly scheduled monthly business performance review.

2. Create heightened awareness for timely processing of NCRs to closure through written communication with affected CL&FTS employees.

Completion Dates:

Corrective Action: 10/29/99

Recurrence Control 1: 11/2/99

Recurrence Control 2: 10/29/99

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**ITEM A.2**

Reason For Nonconformance:

CL&FTS management interpretation and application of the requirement for nonconformance package completeness.

CL&FTS management may not have realized the implicit reference to certain type documents within the nonconformance package (i.e., As Found/As Left calibration reports) may not provide an easily auditable trail to personnel outside CL&FTS. All documentation associated with nonconformance packages are retrievable. Nonconformance packages stating actions that require the completion and submittal of other QA record types have not necessarily been submitted for duplicate electronic storage of these records. An example would be when a laboratory measuring and test equipment (M&TE) device failed recalibration, an As Found calibration report would be completed documenting the out-of-tolerance condition. At that time a Nonconformance Report would be initiated which would be circulated in a folder, along with a copy of the completed As Found calibration report, until all evaluation of the impact had been completed. Once all evaluation is complete, an As Left test is performed returning the item to useable condition and the As Left calibration report is also included in the nonconformance package to complete the routing process for department manager review and QA manager approval. The entire nonconformance package is then submitted to QA Document Control. Document Control submits the As Found calibration report as a QA record in an electronic document management system (EDMS) as a separate document type from the nonconformance report. The As Left calibration report would also then be submitted into EDMS with a copy of the nonconformance report attached to it. Lastly, the nonconformance report (without the calibration reports to avoid duplication) would also then be submitted into EDMS as a separate document type. While the nonconformance package submitted to EDMS does not contain a copy of the calibration reports nor, at times, make explicit reference to it, it is implied through reference to a traceable unique identification number and make and model of the device. Historically, this methodology of record storage was first established because the calibration report was usually the first document to be retrieved and sorted from when evaluating trends and impact investigations for out-of-tolerance laboratory standards. The As Found calibration report would not be explicitly referenced in the body of the nonconformance package, nor the follow-up As Left calibration report, although there would be a statement similar to "adjust, perform as left, and return to service." This example is for those nonconformances initiated against failed laboratory standards, if the nonconformance was for any other issue, the nonconformance report submitted to EDMS should stand alone with complete documentation.

Corrective Action:

Revise CL&FTS-QAP 7.2, "Control of Nonconformances," Section 6.1.3.11, to clarify definition of completeness of nonconformance packages. Completeness will be clarified to mean NCR document package will include all pertinent documentation or clear reference to pertinent documentation.

**CENTRAL LABORATORIES & FIELD TESTING SERVICES (CL&FTS)**
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**(NONCONFORMANCE 99901341/99-01-01)**

**ITEM A.2 (continued)**

Recurrence Control:

Communicate with the CL&FTS QA and Document Control Staff the definition of what constitutes a complete NCR document package as stated in Corrective Action 1 above, and the expectation that NCR packages will be reviewed for compliance prior to final approval, closure, and submittal as a QA record.

Completion Dates:

Corrective Action: 11/3/99

Recurrence Control: 10/29/99