

**ANATEC INTERNATIONAL, INC.  
RESPONSE TO NOTICE OF VIOLATION  
DOCKET NO. 99901342/1999201-01**

**REFERENCE '1'**

## 10 CFR PART 21 REPORT FORM

1. **Date Information Obtained:** April 29, 1999
2. **Site Name:** Comanche Peak II
3. **Site Address:** TU Electric, Hwy. 56, Glen Rose, Tx 76043
4. **Affected Component or Item:** Personnel Training Records and Certifications ( See Attachment )
5. **Describe Nature of Defect or Failure to Comply:** It appears that there is an unauthorized use of NDE Personnel Training Records and Certifications that were not officially released by the AJB Technologies Quality Assurance Coordinator. These records, belonging to AJB Technologies, Inc., are being used by other vendor/employers as part of their certification packages. They are being presented to the utility customer although these records were obtained contrary to AJB Technologies Corporate Policy, AJB-QA-001, Quality Assurance Manual for Consulting and Inspection Services and QA Procedure AJB-A-09.3, Qualification and Certification of Non-Destructive Personnel. It is the position of AJB Technologies that Records obtained in this manner are suspect and we can neither guarantee nor be responsible for their accuracy or validity.
6. **Describe the Potential Safety Hazard:** The documentation associated with the use of questionable and unauthorized copies of Personnel Training Records and Certifications must be considered suspect. There were discrepancies in a QDA Rap Sheet pursuant to AJB Policies and Procedures which is why it is important that records be obtained only through official channels.
7. **Has the Client Representative Been Informed:** The employers and the contractor we have knowledge of have received a copy of this Report Form by registered mail, return receipt requested. We have also talked directly with one customer we are aware of, Comanche Peak.

**8. Affected Vendors:**

Edward P. Lopez, President  
CoreStar International Corporation  
1044 Sandy Hill Road  
Irwin, PA 15642  
(724) 744-4094

Blaine Curtis, P.E.  
Anatec, Intl.  
930 F. Calle Negocio  
P.O. Box 3758  
San Clemente, CA 92673-3758  
(714) 498-3350

Mr. Gary P. Pierini, ET Level III  
Westinghouse Electric Co.  
Waltz Mill Site  
P.O. Box 158  
Madison, PA 15663  
(724) 722-5396

**9. Affected Utilities: (Known)**

Comanche Peak  
Wolf Creek

Submitted by: Dominick J. Tommarello  
Dominick J. Tommarello, V.P of Operations

Date: 4/29/99

Reviewed by: June A. Tommarello  
June A. Tommarello, QA Coordinator

Date: 4/29/99

**A. Evaluation Report:** AJB Technologies, Inc. has initially verified this information with our primary NDE site contact at Comanche Peak, Mr. Steve Swilley, by phone. There are two problems as we see it at AJB:

- (1) AJB Technologies, Inc. has a breach of their QA and Corporate Procedures since these copies appear to have been made without authorization. We need to determine who was responsible for this breach and how this occurred in order to prevent recurrence.
- (2) The greater issue is that there are questionable personnel records being presented to customers as valid. All unauthorized documentation must be treated as suspect.

AJB Technologies, Inc. does not have the access required to determine the scope and magnitude of this problem (i.e., sites affected). We also do not have the investigative authority to examine and question how other vendors procure and obtain their personnel records nor would it be appropriate for us to do so.

After searching the NRC Part 21 Internet site, no similar set of circumstances that would provide guidance for resolution of this problem could be found. If AJB had become aware of this problem prior to analysis actually being performed by these personnel, it would have been possible to handle the problem by contacting the parties involved and informing them that they were using unauthorized copies of personnel records and certifications. However, once analysis was performed for site customers, this option was no longer possible and the scope had moved beyond AJB's range of ability to resolve.

Because of the industry-wide implications of this violation and the recent emphasis on personnel records and certifications, AJB Technologies is obligated to report this as a potential 10 CFR, Part 21 discrepancy to the NRC.

- B. Basis of Acceptance or Rejection:** This report is Accepted and will be forwarded to the NRC for verification or rebuttal so an appropriate and thorough investigation can be conducted and an appropriate remedy can be implemented.

Disposition by: June A. Tommarello Date: 5/4/99  
June A. Tommarello, President

**If you require any additional information please contact:**

June A. Tommarello, President  
AJB Technologies, Inc.  
705 Sagamore Drive  
Greensburg, PA 15601  
Phone: (724) 834-8552  
Fax: (724) 834-8559

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## **REFERENCE '2'**