NRC FORM 591S PART 1
(05-2012)
10 CFR 2.201

U.S. NUCLEAR REGULATORY COMMISSION

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. CERTIFICATE/QUALITY ASSURANCE PROGRAM (QAP) HOLDER:	2. NRC/REGIONAL OFFICE
Holtec International Holtec Center 555 Lincoln Drive West Marlton, NJ 08053	Headquarters U. S. Nuclear Regulatory Commission Mail Stop 3WFN-14C28 Washington, DC 20555-0001
REPORT NUMBER(S) 072-1014/2014-201	

3. CERTIFICATE/QAP DOCKET NUMBER(S)	4. INSPECTION LOCATION	5. DATE(S) OF INSPECTION
72-1014, 72-1032 and 71-9325	Holtec Manufacturing Division Turtle Creek, PA	March 10-14, 2014

CERTIFICATE/QUALITY ASSURANCE PROGRAM HOLDER:

The inspection was an examination of the activities conducted under your QAP as they relate to compliance with the Nuclear Regulatory Commission (NRC) rules and regulations and the conditions of your QAP Approval and/or Certificate(s) of Compliance. The inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector. The inspection findings are as follows:

☑ 1. Based on the inspection findings, no violations were identified.

☐ 2. Previous violation(s) closed.

☐ 3. The violations(s), specifically described to you by the inspector as non-cited violations, are not being cited because they were self-identified, non-repetitive, and corrective action was or is being taken, and the remaining criteria in the NRC Enforcement Policy, to exercise discretion, were satisfied.

_____ Non-cited violation(s) was/were discussed involving the following requirement(s) and Corrective Actions(s):

☐ 4. During this inspection, certain of your activities, as described below and/or attached, were in violation of NRC requirements and are being cited in accordance with NRC Enforcement Policy. This form is a NOTICE OF VIOLATION, which may be subject to posting in accordance with 10 CFR 19.11.
(Violations and Corrective Actions)

Statement of Corrective Actions

I hereby state that, within 30 days, the actions described by me to the Inspector will be taken to correct the violations identified. This statement of corrective actions is made in accordance with the requirements of 10 CFR 2.201 (corrective steps already taken, corrective steps which will be taken, date when full compliance will be achieved). I understand that no further written response to NRC will be required, unless specifically requested.

TITLE	PRINTED NAME	SIGNATURE	DATE
CERTIFICATE/QAP REPRESENTATIVE	Mark Soler, VP Quality Assurance	Mark Soler	3/14/14
NRC INSPECTOR	Earl C. Love	Earl C Love	3/14/2014
BRANCH CHIEF	Joseph Donoghue	Jon N. Woodfield for	4/18/2014

INSPECTOR NOTES COVER SHEET

Licensee/Certificate Holder (name and address)	Holtec International 555 Lincoln Drive West Marlton, NJ 08053
Licensee/Certificate Holder contacts	Greg Miller, Quality Manager - Holtec Manufacturing Division Mark Soler, Holtec Corporate Quality Assurance (QA) Manager
Docket No.	72-1014
Inspection Report No.	0721014/2014-201
Inspection Date(s)	March 10-14, 2014
Inspection Location(s)	Holtec Manufacturing Division (HMD),Turtle Creek, PA
Inspectors	Earl Love - Team Leader, Inspector Robert Temps - Senior, Inspector Jon Woodfield - Inspector
Summary of Findings and Actions	This inspection involved a review of Holtec's wholly owned fabrication facility, HMD, located in Turtle Creek, PA. At the time of the inspection, cask storage system fabrication activities were ongoing for multiple 10 CFR Part 50 licensees. The team assessed fabrication activities for compliance to 10CFR72, 10CFR71, 10CFR Part 21, HOLTEC Certificate of Compliance Nos. 72-1014 (HI-STORM), 72-1032 (HI-STORM FW), 72-1040 (HI-STORM UMAX), 71-9325 (HI-STAR 180) and Holtec's Quality Assurance Program (HQAM 14 dated Jan 9, 2006) as approved by NRC. The team examined and witnessed selected fabrication, assembly, and test activities and reviewed numerous quality procedures, as well as quality records. Overall, HMD's fabrication activities, and Holtec's oversight of the fabrication activities, were assessed to be adequate in meeting their QA Program requirements as well as NRC QA requirements. No cited violations of NRC requirements were identified.
Lead Inspector Signature/Date	Earl Love 4/17/2014 Earl Love
Inspector Notes Approval Branch Chief Signature/Date	Jon N. Woodfield for Joseph Donoghue 4/18/2014

INSPECTOR NOTES: APPLICABLE PORTIONS OF 02.01 THROUGH 02.07 OF IP 60852 WERE PERFORMED DURING THE INSPECTION WITH RESULTS DOCUMENTED BELOW:

02.01: Determine whether the fabrication specifications are consistent with the design commitments and requirements documented in the SAR, and, as applicable, the CoC or the site-specific license and technical specifications.

Holtec was granted an NRC 10 CFR Part 72 Quality Assurance (QA) Program Approval as a prerequisite to its using Type B Casks for storage and transport of radioactive material. The team assessed Holtec's implementation of its NRC-approved QA program with respect to design, procurement, fabrication, assembly, and testing, of various cask systems. The team noted that Holtec is registered as the Certificate of Compliance (CoC) holder for the following storage and transport cask systems:

Cask System	CoC
HI-STORM 100	72-1014, Amendment 7
HI-STORM FW	72-1032, Amendment 0
HI-STAR 180	71-9325, Amendment 0
HI-STORM UMAX	72-1040, NRC review

The team noted that all the design development for the products manufactured at Holtec's Manufacturing Division (HMD) occurs at the Holtec corporate offices in New Jersey. The Holtec corporate office develops three drawings for 10 CFR Part 71 and 72 projects: licensing, design, and fabrication. Although HMD has access to all design documents (such as specifications, calculations, design criteria documents, project plans, and design drawings) through the Holtec computer system; HMD is primarily concerned with the fabrication drawings for a project.

The team reviewed the design control section of the Holtec Quality Assurance Manual (HQAM) Revision 14 and the Holtec Quality Procedures (HQPs) that address design controls to verify they are being properly implemented at HMD. The team specifically reviewed the following procedures associated with design control:

Procedure No.	Revision	Title
HQP-2.9	7	Information Management and Configuration Control
HQP-3.0	25	Project Planning, Design Control, Product Realization and Project Execution
HQP-3.1	10	Design Input Requirements
HQP-3.2	26	Design Analysis
HQP-3.3	29	Design Verification
HQP-3.4	4	Design Specifications and Design Criteria Documents
HQP-3.5	4	Procedures and Practices for Streamlining Engineering Design and Analysis Activities
HQP-5.1	35	Engineering Drawings

Holtec's system for the initiation, review, and approval of design documents is all electronic. Design documents are transmitted electronically during the design process from computer work station to computer work station of initiators, reviewers, and approvers. All signatures on design documents are electronic with user name and password protection.

HMD is involved in the design process for fabrication drawings. Generally, in the development of new and revised fabrication drawings, the Product Line Manager at HMD for a fabrication contract/project will be an official reviewer of the drawings; especially at initial issue. A Drawing and Bill-of-Materials Review and Approval Log (DBMRAL) is associated with the initial issue and every revision to a fabrication drawing. The DBMRAL lists the names of the designer, checker, required technical discipline reviewers, HMD reviewer, other reviewers, approvers and the date of their electronic signature. Once final approval is received, the project manager in New Jersey releases the fabrication drawing into the electronic system. At release, the fabrication drawings have a watermark added to them stating "Released for Fabrication." Also at release, a unique verification identification record (VIR) number is added to the drawing revision. The DBMRAL for drawings is tied to the VIR number. From the unique drawing number and VIR, the DBMRAL for that revision can be retrieved. As stated in document control, fabrication drawings are available to all Holtec employees with computer system access; however, notification by email of a new drawing or revision release is sent to individuals associated with the drawing's project.

Engineering Change Orders are not written at HMD. HMD can ask for changes to fabrication drawings by sending emails to the New Jersey Headquarters. HMD only has the Condition Report (CR) and Non-conformance Report (NCR) processes available. Some standard NCR's can be dispositioned at HMD. More involved NCRs have to be sent to Holtec headquarters for disposition. Generally, a dispositioned NCR does not require a fabrication drawing change. The NCRs generally only apply to one fabricated component or assembly. NCRs are engineering documents that will be a part of the documentation package for a particular cask unit and not shown or noted on the fabrication drawings.

The team reviewed extensively fabrication drawing 8741 revision 2, sheets 1 through 8 [Hi-STORM UMAX – Cavity Enclosure Container (C.E.C) Assembly & Details], the associated VIR No. 10747, and the associated DBMRAL.

Overall, the team noted that HMD is effectively implementing its design control procedures. The team noted that fabrication engineering drawings were receiving the proper independent verification reviews and approvals. Overall, no concerns were identified in the design control area.

02.02: Determine whether corrective actions for identified fabrication deficiencies have been implemented in a time frame commensurate with their significance, and whether nonconformance reports documenting the deficiencies have been initiated and resolved.

The team reviewed HQP 15.2, "Nonconformances," the Holtec Corporate procedure used at HMD applicable to nonconformances. The procedure allows for the identification and resolution of nonconformances that occur for Holtec/HMD performed work through use of a NCR as well as vendor deficiencies through use of Supplier Manufacturing Deviation Reports (SMDRs) and Vendor Nonconformance Reports (VNCRs).

The team reviewed a representative sampling of open and closed NCRs and assessed that resolution of the issues documented in the various reports was appropriate, with the reports closed in a timeframe commensurate to their importance. In the few cases where human performance or programmatic issues appeared as contributory causes to an NCR, the team noted that these issues were appropriately documented through the higher level Quality

Program Violation (QPV) corrective action program process. The team also verified that for NCRs that were in open status, the affected components in the shop had been tagged as required by HQP 15.2. The team reviewed several NCRs that had associated SMDRs. In addition to addressing vendor identified nonconformances, in accordance with HQP 15.2, the SMDR form is also used by Holtec's corporate office to disposition any NCRs initiated at a Holtec division for equipment for which a discrepancy against a company drawing, specification or procedure has occurred and the proposed disposition is "accept as is" or "repair." For these NCRs, the team verified that the associated SMDRs were referenced by the NCR, that technical justification was provided in the SMDR and any required 10 CFR 72.48 screenings/evaluations were performed.

The team noted that the Quality Manager (QM) is required to perform tracking and trending of all NCRs. The team discussed with the Corporate QA Manager how trending is performed and the results presented to Holtec management. The team was provided copies of the last two HMD Quarterly NCR Reports (third and fourth Quarter of 2013) from which the team verified appropriate trending of NCRs was occurring, as required by HQP 15.2, and that this information was presented for Holtec management review.

The team reviewed QPV Form 854 that was generated by HMD as a result of a finding during the last NRC inspection at the HMD facility in December 2010. The team assessed that a detailed and comprehensive extent of condition was performed by Holtec and that additional minor discrepancies were identified and addressed through the QPV process.

Overall, no concerns were identified in the manner in which HMD resolves fabrication nonconformances.

02.03: Determine whether individuals performing quality-related activities are trained and certified where required.

The team reviewed HQP 18.1, "Certification of Audit Personnel," and also reviewed the certification records for three lead auditors. The team determined that the lead auditors' qualifications were documented in accordance with the HQP 18.1 requirements including annual recertification.

The team interviewed HMD welders and assessed the systems being used to control production welding in regards to welding production drawing and changes, determining the correct WPS for fabrication use, assigning of qualified welders, tracking welder qualifications, and issuing of welding materials and tracking usage. HMD uses a computer-based production routing system to control the activities noted above. The team witnessed production welding and reviewed several fabrication travelers and was able to verify adequate weld controls. In addition, welders were qualified in accordance with HQP No. 9.2, "Welder Qualification Requirements." The team reviewed a sample of Weld Performance Qualification Records of welders that were observed in the shop (welder identification numbers 93, 164, 453 and 795) and compared those records to HMD's Qualified Welder's List and their process qualifications. The team noted welder performance qualifications and welder continuities conformed to Section IX of the ASME Boiler and Pressure Vessel Code and HQP 9.2. No concerns were noted.

The team reviewed applicable procedures and records to determine if individuals performing testing and examinations were trained and certified. The team witnessed visual, penetrant,

helium leak examinations and sampled training, qualification and certification records. Visual and penetrant examinations were performed by HMD qualified examiners. The team noted that HMD had outsourced helium leak testing and radiograph examinations to Industrial Testing Laboratory Services, LLC (ITLS) and System One Holdings, LLC (SOH), respectively. The team reviewed ITLS and SOH certificate of qualification and certification summaries as well as vision acuity records and determined that examiners were qualified according to American Society for Nondestructive Testing (ASNT) Recommended Practice No. SNT-TC-1A. In addition, the team noted that helium leak testing and radiograph examinations were performed according to ITLS and SOH procedures as approved by HMD. The team concluded that HMD certification of inspection personnel was adequate.

The team reviewed the following procedures that establish methods for performance of testing/examinations:

Procedure No.	Revision	Title
ITLS 204	13	Helium Leak Testing
SC-111	20	Radiograph Testing
QCP 9.6H	11	Liquid Penetrant Examination
QCP 10.5H	17	Visual Weld Examination

02.05a: Determine whether materials, components, and other equipment received by the fabricator meet DCSS (dry cask storage system) design procurement specifications.
02.05b: Determine whether the procurement specifications conform to the design commitments and requirements contained in the SAR and, as applicable, the CoC or the site-specific license and technical specifications.

The team reviewed procurement procedures, reviewed various approved vendor audits and surveillances, and traced the procurement history of components undergoing fabrication to verify that they were procured from qualified suppliers and met specifications.

The team reviewed HQPs that address procurement, traceability, and receipt inspection to verify they are being properly implemented at HMD. The team specifically reviewed the following procedures:

Procedure No.	Revision	Title
HQP-4.1	20	Purchase Requisitions
HQP-4.2	6	Purchase Specifications
HQP-7.0	18	Receipt Inspection
HQP-7.5	28	Commercial Grade Dedication and Quality Plans
HQP-8.0	7	Material and Item Identification and Control

The team obtained Material Identification and Control (MIC) numbers for a sampling of materials in use on the shop floor and undergoing fabrication to use in evaluating HMD's overall material procurement process. HMD staff demonstrated traceability through the documentation they provided for each of the MICs the team selected. MIC numbers of shop materials were traceable to applicable purchase orders and the associated heat/lot numbers provided with the vendor documentation at HMD receipt inspection. The team specifically reviewed the procurement, traceability and receipt inspection of stainless steel plate, weld wire, weld flux, and a MPC lid stainless steel forging. Each MIC number for these items was traced back to a

Material Inspection & Release Form (MIR). The MIR for each item showed the purchase order number for the item. The vendor certification documents that were supplied with each item at receipt inspection as required by the respective purchase orders were reviewed and all contained reference to the Holtec purchase order. The team reviewed the vendor certification documentation for each item against the respective purchase orders and applicable procurement specifications and found no concerns. The team also noted that 10 CFR Part 21 (Part 21) requirements were included, when required, on the purchase orders reviewed.

However, the team noted an incorrect notation of a stainless steel plate heat number assigned to a MIC number. The team requested Holtec to demonstrate that traceability between the MIC and the correct heat number had not been lost. After further discussion and demonstrations of search techniques on their database, the team concluded that traceability would be recovered and the error discovered if an actual search had been required. Holtec wrote Condition Report CR 0176-135 Revision 0 for the issue since the MIR that contained the error had been Quality Assurance reviewed and signed off as correct. The team determined that the error was an isolated condition and of low significance. Overall, Holtec's material traceability, procurement, and receipt inspection controls were adequate.

The team reviewed a sample of vendor audits/surveillances performed by or for HMD for procured materials. All materials sampled were verified to have been procured from companies listed on Holtec's Approved Vendor List (AVL), also used by HMD, and audit or surveillance reports were within their required periodicity for maintaining the subject companies on the AVL. The majority of audits reviewed were performed by NIAC (Nuclear Industry Assessment Committee) in which Holtec participates. Through HQP 7.4, "Approved Vendor List," Holtec places controls on the use of NIAC audits. Controls include a requirement that only audits performed in the previous three years are considered for acceptance and the AVL three year requalification date is based on when the NIAC audit was performed, not when the supplier was added to Holtec's AVL. HQP 7.4 also has provisions for documenting the review and approval of NIAC audits by the QA Manager for acceptability using Exhibit 7.4.5. The team noted that vendor qualification audits performed by Holtec were comprehensive and that audit findings were entered into and tracked through the corrective action program. Overall, no concerns were identified in this review.

Overall, the team concluded that HMD's procurement activities were being performed in accordance with their controlling procedures. Methods used to approve addition of suppliers to the AVL were appropriate and the audits and surveillances used to qualify and maintain suppliers on the AVL were adequate. Where issues identified in the audits required response by the supplier, documentation of supplier corrective action was included in the audit files.

02.06: Determine whether DCSS components are being fabricated per approved QA and 10 CFR Part 21 implementing procedures and fabrication specifications.

Document Control

Holtec's corporate headquarters in Marlton, New Jersey has the primary responsibility for document controls at Holtec. HMD has access to controlled documents in the Holtec document control system through the Holtec corporate headquarters electronic computer system. However, the HMD is responsible for entering quality records associated with the manufacturing of products into the Holtec document control system.

The team reviewed the document control section of Holtec's HQAM, Revision 14 and HQP's that address document controls to verify they are being properly implemented at HMD. The team specifically reviewed the following procedures associated with document control:

Procedure No.	Revision	Title
HQP-6.0	12	Document Control
HQP-6.1	9	Project Document Transmittal and Control
HQP-17.0	22	Quality Assurance Records

HMD's document control coordinator (DCC) adequately demonstrated the function of Holtec's electronic document system. All HMD personnel have read only access to all the existing documents in the Holtec headquarters managed document control system. The HMD DCC receives electronically an email notification/list when a drawing/procedure or other document relevant to the HMD is revised or created. The coordinator does not act on the notification email information upon receiving it. Other individuals at HMD will also receive notification of the created document or revised document based on the headquarters distribution list for the document(s). The distribution list is generally the individuals associated with the project for which the document applies. If the new or revised document is not project specific, such as a HQP procedure; it will be electronically distributed throughout the HMD staff for reading and electronic acknowledgement back to headquarters. At HMD, the primary documents received by electronic notification that affect manufacturing are new and revised fabrication drawings. As previously stated, other HMD individuals besides the DCC will receive notification of new and revised drawings as required. For their project, a HMD Product Line Manager (PLM) will receive the notification of a new drawing or revision and release the drawing to the fabrication shop after their review. The PLM releases the drawing(s) to the shop floor by sending electronically the HMD DCC a document transmittal form (DTF). The DTF provides the coordinator information on how many copies are needed and where to distribute them in the fabrication shop. The DCC prints the required number of large copies of the drawing(s) and goes to the designated shop area drawing stations to remove the old revision, throw it away, and replace it with a revised drawing. If the drawings are initial issue, the coordinator will create a new drawing stick file for use at each required drawing station.

To verify the coordinators work, there are computer terminals available for the shop craftsmen to use at the shop drawing stations. The craft are trained to check in the computer system every shift that the stick file drawing revision is the same as the computer system current revision. Each drawing in the shop must also have a water mark on it stating "Released for Fabrication" before it can be used.

The team verified that revision 2 of drawing 8741 sheets 1 through 8, listed as current in the HMD computer system, was actually available at the required shop drawing locations. The team found all copies of the drawing sheets to be at the correct revision in the shops. The team also checked the drawing revision at one of the computer terminals in the shop and it correctly showed 2 as the correct drawing revision.

At HMD, the PLMs also have a large role in document control. The individual PLMs assigned to and responsible for the various manufacturing contracts are given the task of ensuring that all quality records associated with the manufacturing of a final product are placed into the Holtec computer system. Not all the records have a unique identifier, so the PLM must create folders in some instances to group various project records and provide retrievability. The PLMs

generally act independent of the DC coordinator in performing this task.

Overall, the team determined that adequate document control and records management exist at HMD with no concerns.

Fabrication, Assembly and Test

The team observed fabrication, assembly and test activities for compliance to quality program and implementing procedures. The observations included an assessment of in-process travelers, inspection and test reports, and data sheets. In all cases manufacturing drawings, job travelers and inspection and welding procedures were adequately identified and were located at various work stations. In addition to the procedures referenced in 02.03, implementation of the following specifications, HQPs and Holtec Standard Procedures (HSPs) were verified:

Procedure No.	Revision	Title
PS-101	62	Procurement Specification for the Fabrication of Holtec Multi-Purpose Canisters (MPCs)
HSP-101	36	In-Process and Final Inspection Procedure for the Fabrication of MPCs
HSP-104	24	MPC Basket Plate Gage Test
HSP-300	4	Weld Material Control
HQP-9.4	7	Qualification and Performance of Welding Activities
HQP-9.6	1	Control and Qualification of NDE Procedures
WPS-47HC	0	Manual GTAW on Stainless Steel Base Metals
WPS-77	9	FCAW-Spray/Globular
WPS-227HC	1	Machine SAW on Stainless Steel Base Metals

The team witnessed welding of various components including base plate to shell (Vermont Yankee #14 and Vogtle #16), repair of a base plate to shell weld (Vogtle #10), basket support shims (Vogtle #9), and construction of a 2 piece top lid assembly (Vermont Yankee #15). The team noted proper issuance and control of the weld wire through use of Weld Wire Release Forms assigned to each welder and verified by observation compliance to those documents. The team verified that the weld equipment used was calibrated and that the filler wire diameter and electrical characteristics (voltage and amperage) and the type of weld (fillet) were compliant to the weld procedure and manufacturing drawings. Concerning the weld repair of a base plate to shell weld (Vogtle #10), the team reviewed RT inspection reports and verified compliance to procedure No. SC-111, Revision 20, "Radiographic Testing."

The team witnessed portions of a helium leak test of a Browns Ferry (Serial No. 3) shell assembly. The test was performed by a contracted Level II ASNT certified leak test technician in accordance with Industrial Testing Laboratory Services, LLC (ILTS) Procedure No. 204, Revision 13, "Helium Leak Testing." The team noted the use of a pre-test set-up check sheet and the wrapping of the shell in plastic with minimal free space between the MPC outer surface and noted that the extent of the test was to the MPC shell and MPC shell to baseplate welds. The team observed instrument calibration checks as required by procedure and noted the equipment (i.e., calibrated leak standard, temperature gauge, and oxygen analyzer) designated for the test was appropriately calibrated. Lastly, the team witnessed a basket assembly plate gage test on River Bend Unit No. 23. Overall, no deficiencies were noted.

The team observed the use of markings such as tags and routing cards indicating the status of inspections and tests performed on numerous items in various production stages. Specifically, the team noted the inspection status of MPC shell assemblies, upper and lower shells, baseplates, basket assemblies, and lids. The team noted the assemblies and components satisfactorily passed their required inspections and tests, where required, and that inadvertent bypassing of the inspections of tests had not occurred. No concerns were identified.

The team verified that appropriate procedures were implemented for control of Measuring and Test Equipment (M&TE). HMD has approximately 3000 devices in its M&TE program. The team specifically reviewed the following documents/procedures associated with M&TE:

Procedure No.	Revision	Title
HQP-12.0	23	Equipment Calibration and Control of Measuring and Test Equipment Document Control
HSP-13	9	Calibration of Measure and Test Equipment

The team interviewed the quality engineer responsible for administrating and updating the computer database of the devices in HMD's M&TE program. The database contains a unique serial number and description of each item in the M&TE program. The database also provides the location in the shop facility, standard for calibration, calibration tolerance, range check points as applicable, frequency of calibration, applicable procedure, and current status of each M&TE device. The M&TE quality engineer can perform database queries to identify M&TE that is soon due for re-calibration.

The team reviewed the calibration records for various M&TE being used in the fabrication shops to assess the control and traceability of measuring and test equipment for compliance with the procedures. Specifically, the team reviewed calibration records of an Infrared thermometer, 12" caliper, sub arc welding machine, oxygen analyzer, and calibrated helium leak standard. The records documented: date of calibration, item description, serial number, due date for next calibration, "As-found" and "As Left" condition at each calibration or check point, reference procedure used, test standard identification, and allowable tolerance; as applicable for each device. The team then located each device in the fabrication facility to verify calibration labeling in accordance with the procedures. The team noted appropriate labeling, proper identification of the M&TE, initials of the person who performed the latest calibration, date of calibration, and next calibration due date. No M&TE program concerns were identified by the team.

02.07a: With regard to fabrication activities, determine whether they are conducted under an NRC-approved QA program (10 CFR 72.140).

HMD, as a wholly owned subsidiary of Holtec, uses Holtec's QA Program which is an NRC-approved program.

02.07b: With regard to fabrication activities, determine whether the provisions of 10 CFR Part 21, "Reporting of Defects and Noncompliance," for reporting defects that could cause a substantial safety hazard have been implemented.

The team determined that HMD uses procedure HQP 15.1, "Reporting of Defects and Noncompliances per 10 CFR 21," that governs the reporting of defects.

02.07d: With regard to fabrication activities, determine whether the fabricator has complied with 10 CFR 21.6, "Posting requirements."

The team verified that the Part 21 requirements were posted in multiple accessible locations at the various fabrication shops that comprise the HMD fabrication facility.