



SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. CERTIFICATE/QUALITY ASSURANCE PROGRAM (QAP) HOLDER:

QSA Global, Inc.
40 North Avenue
Burlington, MA 01803

2. NRC/REGIONAL OFFICE

Headquarters
U. S. Nuclear Regulatory Commission
Mail Stop 3WFN 14C-28
Washington, DC 20555-0001

REPORT NUMBER(S) 0710040/2019-201

3. CERTIFICATE/QAP DOCKET NUMBER(S)

07100040

4. INSPECTION LOCATION

Burlington, MA

5. DATE(S) OF INSPECTION

October 22-24, 2019

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 violation(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.

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

Refer to NRC Form 591S Part 2 for Non-cited violation.

- ☐ 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	Michael Fuller, Director, Regulatory Affairs/Quality Assurance		25 NOV 2019
NRC INSPECTOR	Earl Love		12/03/2019
BRANCH CHIEF	Margi Kotzalas	Margi Kotzalas via email 12/3/2019	12/3/2019

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10 CFR 71.111, "Instructions, procedures and drawings," states, in part, that the certificate holder shall prescribe activities affecting quality by documented procedures of a type appropriate to the circumstances and shall require that these procedures be followed.

Contrary to the above:

1. Technical disposition of nonconformance reports dispositioned "Use-As-Is" lack a basis for acceptance.
2. QSA adopts the International Laboratory Accreditation Cooperative (ILAC) Mutual Recognition Arrangement (MRA) accreditation process for calibration and material testing services in lieu of performing a commercial-grade survey without meeting the requisite elements of NRC Regulatory Issues Summary 2016-01.
3. QSAs approved supplier and procurement process for commercial-grade dedication and important-to-safety Category A components lacked elements necessary to support dedication and/or indicate supplier commitment to 10 CFR 71, Subpart H and 10 CFR 21, as applicable.

