Franklin Research Center
A Division of The Franklin Institute

June 27, 1983

Mr. Uldis Potapovs, Chief
Vendor Program Branch
Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

JUL - 5 1983

Reference: Docket No. 99900921/83-01; "Notice of Nonconformance" transmitted as Appendix B in your letter dated June 1, 1983.

Dear Mr. Potapovs:

In response to the findings cited in the referenced Notice of Nonconformance, the Franklin Research Center (FRC) proposes to complete the following corrective actions and preventive measures on or before September 1, 1983.

"Notice of Nonconformance" Paragraph	Proposed Corrective Actions and Preventive Measures
A.1. (2) QASD 4-1 (3) QAP 4-1 QAP 4-2 Finished 3 Procedures ok 10-27-83 GH	Detailed documented procedures will be established for: (1) the training of technical personnel, (2) quality assurance indoctrination of personnel, and (3) the training of auditors and certification of lead auditor. These procedures will describe how, where, and what training records will be maintained. Need to Identify who is responsible in procedures also. Review when available.
QAP 4-2 QASD 17-1 Sec 17 of QAP 4-2 ok 10-27-83 GH A.2. being written	A written procedure will be established to identify, control, and evaluate deviations from approved test procedures. Should Identify who does what in procedures. Review when available.
QASD 14-1 ok GH 10-27-83 A.3.	The responsibilities of Quality Assurance personnel during qualification testing will be described in a documented procedure to assure compliance of the test program with sponsor technical specifications and quality assurance requirements. Review when available
QAP 4-1 10-27-83 GH ok B. Per Andy on 8-1-83 this should be ok. Review during ty	Technical and editorial review of Test Procedures (TPs) for Franklin Institute Laboratory, Inc. (FIRL) Project No. 5653 has been accomplished in accordance with paragraph 2.2 of Franklin Quality Assurance Procedure (QAP) No. 14-1. To prevent recurrence, reviews of TPs will be conducted by competent personnel in a more timely manner. How will this review be documented & what has been changed to assure competent personnel will do the review.
QAP 16-1 10-27-83 ok GH C. Finished	In accordance with paragraph C.2 of Section 16 of the Franklin QA Manual, QAP No. 16-1 "Storage, Handling, and Shipping of Test Specimens" has been prepared for items undergoing qualification testing at the Franklin Research Center. Need to review. Any procedure changes yes

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"Notice of Nonconformance" Paragraph	Proposed Corrective Actions and Preventive Measures
D.,E.,F.	The technicial deficiencies cited in FIRL Project No. 5653 have been communicated to the sponsor (see D. Paulson's letter to PECO dated 6-9-83, and W. Clune's letter to FRC dated 6-15-83). To prevent recurrence, the Project Manager shall assure the completeness of engineering analysis documents, and have the concurrence of the Department Director, or his designee, concerning the technical competence of individuals assigned to verify the adequacy of engineering analyses. The Quality Assurance Manager shall ensure that the test plans and procedures prepared by the Project Manager incorporate and satisfactorily implement contractual requirements, and are reviewed for approval by qualified personnel. Is there a change to procedures on Manual to require the above? yes
G.	A documented procedure will be established which shall delineate the responsibilities of Quality Assurance personnel in monitoring qualification testing programs. A checklist with sign-off by QA personnel will be developed to assure the qualification of test personnel, the identification and control of test specimens, the use of approved test procedures, adequate environmental conditions, and the use of calibrated test instrumentation. Review when available

QAP 9-1 Review changes

QAP QA-SD 14-1 ok 10-27-83 GH not finished

In addition to the above corrective measures, FRC will clarify the Franklin QA Manual and supplementing procedures as follows:

ok 10-27-83 GH 1. The corporate QA policy statement in Section 2 of the QA Manual will be strengthened. verify

ok 10-27-83 GH 2. Section 14. "Test Control" and supporting QAPs will be modified to specifically state that the Quality Assurance Manager, or his designee, will review Test Procedures for the inclusion of QA contractual requirements. verify

ok 10-27-83 GH 3. Test Procedures will be controlled under appropriate document control procedures. verify

Please let me know if the above actions are an acceptable resolution of your Notice of Nonconformance.

Sincerely yours,

A. J. Saggiomo

A. J. Saggiomo
Quality Assurance Manager

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Attachments