

APPENDIX A

Pooled Equipment Inventory Company
and PIM Warehouse
Docket No. 99901013/85-01

NOTICE OF NONCONFORMANCE

Based on the results of an NRC inspection conducted on May 28-31, 1985, it appears that certain of your activities were not conducted in accordance with NRC requirements.

Criterion V of Appendix B to 10 CFR Part 50 states: "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Nonconformances with these requirements are as follows:

- A. Section 6.2 of ANSI/ASME N45.2.15-1981 states, in part, "Handling equipment in use shall be subject to inspection....Inspections...include three types: frequent, periodic, and major. Evidence of inspections...shall be made available...."

Section 6, Part IV, of the SEI-PIM-1 maintenance and storage specification, states in part, "...Equipment and rigging shall be inspected periodically to insure...equipment is not frayed, worn or...deteriorated...Kept clean and free of contaminants that are detrimental to the PIM equipment...being handled...."

Contrary to the above, a review of F. W. Hake Associate records revealed that inspections of the rigging and hoisting equipment used in the PIM warehouse were not being performed.

- B. Section 4, Part IV, Appendix B of the SEI-PIM-1 maintenance and storage specification, states in part, "...To protect the equipment, it shall be stored...on a skid with covering tarpaulins and the heaters energized...Heaters shall be energized to maintain...a temperature about 5 degrees C warmer...to prevent condensation...."

Contrary to the above, three RHR vertical shaft electric motors were inadequately stored from the time they were received, March 25, 1985, until May 30, 1985. Tarpaulins were not installed to cover the motors and the equipment heaters were not energized to prevent condensation.

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- C. Section 7, Part IV of the SEI-PIM-1 maintenance and storage specification, states in part, "...Stainless steel material shall have pads (foam, etc.) between the equipment and the support surface..." "...Vapor barrier paper shall be placed between the equipment and any non-metallic support surface..." and "...any outer protective cover shall be removed...."

Contrary to the above, a) thirty-six sections of stainless steel pipe were stored without the required pads between the piping and its support surfaces; b) Sixteen stainless steel fittings were stored without their protective covers being removed, and without vapor barrier paper being placed between the fittings and support surfaces.

- D. Section 7, Part IV of the SEI-PIM-1 maintenance and storage specification, states in part, "...The quantity of desiccant bags...and outside tagging procedures for number of bags located inside the equipment shall be as outlined in ANSI N45.2.2 Appendix A-3...."

Contrary to the above, outside tagging procedures to identify the quantity of desiccant bags inside the equipment storage containers were not being followed.

- E. Section 8.0 of the F. W. Hake, Inc. PIM Procedure WHCP-001, dated 5/3/85, states in part, "...The PIM Program Manager shall provide the Project Manager with a list of those persons authorized to enter the storage area....Persons desiring access to the storage area must sign and date the Storage Area Access Log....Persons not on the authorized access list must obtain prior approval...."

Contrary to the above, a) No specific list of personnel authorized to enter the storage area had been given to the Project Manager; b) None of the persons observed in the storage area had signed and dated the Storage Area Access Log, or were listed on an authorized access list.

- F. Section 2.7.1 of PEICO QA Manual, Revision 1, dated February 15, 1985, states: "Indoctrination in the applicable quality assurance program is provided to individuals who perform activities affecting quality. Each organization is responsible for assuring that the required individuals in that organization receive indoctrination in the quality assurance program. Each organization shall maintain records of individuals who have received this indoctrination." Section 2.7.2, states, "Training is provided to personnel performing or controlling nuclear safety related activities. The training program is performed in accordance with written procedures. Each organization is responsible for assuring generation, implementation, and documentation of a training program suited to their activities. Each training program covers the quality programs, the procedures related to the quality program, the detailed quality requirements, and specific functions of the group. Records shall be maintained."

Contrary to the above, indoctrination and training in the QA program requirements for the entire Hake warehouse staff of 12 permanent and six temporary personnel could not be verified due to incomplete records and there was no objective evidence that a training program had been generated and documented.

- G. Section 2.1.1.3 of the F. W. Hake Inc. QA Manual, No. QAP-9, Revision 4, dated 9/27/78, states, "Measuring and test equipment shall be controlled, calibrated, adjusted and maintained as necessary at prescribed intervals or prior to use against certified equipment having known valid relationships to nationally recognized standards."

Contrary to the above, the calibration and recalibration at prescribed intervals of the Biddle Megger instrument No. 36468, Cat. No. 21159, used during equipment maintenance, could not be verified due to incomplete records.