WYLE
LABORATORIES SCIENTIFIC SERVICES & SYSTEMS GROUP

August 6,1985

Nuclear Regulatory Commission
Washingtown D.C. 20555

Subject: Docket No. 99900905/85-01

Attention: Gary G. Zech, Chief
Vendor Program Branch
Division of Quality
Assurance, Vendor.

Gentlemen:

The reference Docket No. transmitted the results of your Quality Evaluation of our facility. Our response and corrective action is defined in Attachment A.

Again I wish to compliment you on the professional and thorough manner in which the representatives conducted this survey.

Should you have any questions, please contact me.

Very Truly Yours
Wyle Laboratories

L Housteau

L. Housteau
Manager, QA
Norco Facility
Western Test & Engineering

Attachment A
Addendum A & B

CC: R, Sadlier

LE09
1/1

1841 Hillside Avenue, Norco, California 91760 (714) 737-0871 TWX 910-332-1204 Telecopy 714-735-4030

Attachment A

Response to Notice of nonconformance

A Notice:

Paragraph 6.1 of Standing Practice Procedure 518-3-B dated 15,1982,states, "changes to documents, other than those defined as minor changes in 6.2 below, are considered as major changes and shall be reviewed and approved by the same organizations that performed the original review and appproval unless other organizations are specifically designated."

Contrary to the above, Test Plans 566-1674 Rev A dated May 1,1984 and 566-1674-1 Rev A dated May 1,1984, had no documented objective evidence of approval by the same organization that perform the original review and approval.

Response:

Test plans 566-1674 Rev A and 566-1674 Rev A were routed to the same organization for a formal review of the "A" Revision. Completion date was July 31, 1985. To prevent any recurrance the test plan cover page has been revised to provide a signature approval for any revisions.Copies of the cover pages attached as Addendum A. Date corrective action completed July 31,1985.

B. Notice:

Section 11, Paragraph 11.10 of Wyle Laboratories Quality Assurance Manual Rev E dated March 1,1985, states, in part, "Form WL-109, Notice of Deviation will be used when test results deviate from the prescribed requirements as outlind in a specification such as, when a test measurement or observed parameter does not meet specification requirements and when test parameter have deviated from the test specification requirement."

Contrary to the above, test report 58883-1 dated November 20, 1984 and 58883 dated August 24,1984 document instances where deviations to the prescribed requirements occurred during testing but Notices of Deviation were not written.

(a) Response

The test interruption at three hours and fifteen minutes due to the loss of superheated steam was not followed by the issurance

of an NOD because it met the requirement of the Wyle QA manual 380 Rev E,section 11,paragraph 11.10.1.7 " A Notice of Deviation will not be prepared when minor deficiencies are noted and they do not affect the performance of the specimen or prevent it from meeting the specification requirements.". The steam capacity of the superheater is limited and it is common practise to shut down to recharge the superheater.

(b) Response

Failure to generate an NOD when test specimen No. 1 started to leak and was plugged off was a breach of our NOD program.

The test report has been issued since November of 1984 and the deviation is adequately defined, there would be nothing to gain in issuing an NOD at this late date. The NOD program was reviewed with the cognizant test engineer and made a permanent part of his training record.

C Notice:

Section 5, paragraph 5.0 of the Wyle Laboratories Quality Assurance Manual Rev. E dated March 1,1985, states, "Activities affecting quality will be implemented in accordance with documented instructions, procedures or drawings.". Contrary to the above, Wyle Laboratories did not have a documented procedure for the control of mixing the chemical spray solutions used during design basis event testing and monitoring the solution's pH.

Standing Operation Procedure 518-11 titled "LOCA" has been written definding the LOCA system, with a data sheet example of the test media requirements to be filled out prior to the test. It is the cognizant engineer responsibility to complete the form (W614A-82) and to include a copy in his test report. A copy of the form is attached as Addendum B.

Date corrective action completed was July 31,1985

ADDENDUM A

WYLE LABORATORIES
SCIENTIFIC SERVICES & SYSTEMS GROUP
WESTERN OPERATIONS, NORCO FACILITY

Test Plan No. 566-1674

REVISION A
1 May 1984

22 September 1983

TEST PLAN
FOR
DEMONSTRATION OF RAYCHEM CABLE FOR
QUALIFIED USE IN CLASS 1E SERVICE
PRIMARY AND SECONDARY CONTAINMENT
FOR
CAROLINA POWER & LIGHT COMPANY

APPROVALS:

WYLE LABORATORIES:

Test Engineer Luther L Todd Date 9-22-83

Manager, Dynamics Dept. G. J. Lindeman Date 9/23/83

Quality Assurance G Hickman Date 9-23-83

CAROLINA POWER & LIGHT COMPANY David R. Phyne Date 6-5-84

REV. NO.	DATE	BY	APPROVAL DEPT.	APPROVAL QA	APPROVAL CUST.	PAGES AFFECTED	DESCRIPTION OF CHANGES
A	5-1-84			7-31-84		2, 4, & 5	Revised per customer requirements.

WYLE LABORATORIES
SCIENTIFIC SERVICES & SYSTEMS GROUP
WESTERN OPERATIONS, NORCO FACILITY

Test Plan No. 566-1674-1

Page No. 1

REVISION A
1 May 1984

23 September 1983

TEST PLAN
FOR
VOLTAGE WITHSTAND LEVEL TESTING
OF
RAYCHEM CABLE SAMPLES
AFTER A LOCA TEST
FOR
CAROLINA POWER & LIGHT COMPANY

APPROVALS:

WYLE LABORATORIES:

Test Engineer Luther S Grad Date 9-23-83

Manager, Dynamics Dept. J. J. Anderson Date 9/23/83

Quality Assurance B Hickman Date 9-23-83

CAROLINA POWER & LIGHT COMPANY David R. Chase Date 6-5-84

REV. NO.	DATE	BY	APPROVAL DEPT.	APPROVAL QA	APPROVAL CUST.	PAGES AFFECTED	DESCRIPTION OF CHANGES
A	5-1-84			7-11-85		3, 4	Adds Par. 5.9; revises Fig. 1.

ADDENDUM B

WYLE
LABORATORIES SCIENTIFIC SERVICES & SYSTEMS GROUP

DATA SHEET

TEST TITLE LOCA TEST

CUSTOMER _____ Job No. _____

Specimen _____ Date Started _____

Part No. _____ Serial No. _____ Date Comp. _____

Spec. _____ Par. _____ Photo _____ Amb. Temp. _____

CHEMICAL SOLUTION	AMOUNT/PER
1. Boric Acid	_____
2. Sodium Hydroxide	_____
3. Sodium Thiosulfate	_____
4. Demineralized Water	_____
5. Other	_____
SPRAY RATE DENSITY	_____
INITIAL SPRAY pH	_____
pH MONITORED DURING TEST	_____
DURATION OF SPRAY	_____
CHEMICAL MIXTURE FORMULA	_____

_____ _____

SPECIAL INSTRUCTIONS

_____

_____

_____

_____

Tested by _____

W614A-82 QA Form Approval _____ Engineer _____

APPENDIX A

Wyle Laboratories Norco
99900905.85-01

NOTICE OF NONCONFORMANCE

Based on the results of an NRC inspection conducted on May 13-17, 1985, it appears that certain of your activities were not conducted in accordance with NRC requirements as indicated below:

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. Paragraph 6.1 of Standing Practice Procedure 518-3-B dated March 15, 1982, states, "changes to documents, other than those defined as minor changes in 6.2 below, are considered as major changes and shall be reviewed and approved by the same organizations that performed the original review and approval unless other organizations are specifically designated."

Contrary to the above, Test Plans 566-1674 Revision A dated May 1, 1984 and 566-1674-1 Revision A dated May 1, 1984, had no documented objective evidence of approval by the same organization that performed the original review and approval.

B. Section 11, Paragraph 11.10 of Wyle Laboratories Quality Assurance Manual Revision E dated March 1, 1985, states, in part, "Form WL-109A, Notice of Deviation will be used when test results deviate from the prescribed requirements as outlined in a specification such as, when a test measurement or observed parameter does not meet specification requirements and when test parameters have deviated from the test specification requirement."

Contrary to the above, Test reports 58883-1 dated November 20, 1984 and 58883 dated August 24, 1984 documented instances where deviations to the prescribed requirements occurred during testing but Notices of Deviation were not written.

C. Section 5, paragraph 5.0 of Wyle Laboratories Quality Assurance Manual Revision E dated March 1, 1985, states, "Activities affecting quality will be implemented in accordance with documented instructions, procedures of drawings."

Contrary to the above, Wyle Laboratories did not have a documented procedure for the control of mixing the chemical spray solution used during design basis event testing and monitoring the solution's PH.