Thomas E. Paserba, President International Quality Consultants, Inc. 106 Freeport Rd Butler, PA 16002

SUBJECT: NRC INSPECTION REPORT NO. 99901389/2010-201, NOTICE OF VIOLATION

Dear Mr. Paserba:

From June 1 to June 3, 2010, the U.S. Nuclear Regulatory Commission (NRC) conducted an inspection at International Quality Consultants (IQC), Inc. in Butler, Pennsylvania. The enclosed report presents the results of this inspection.

This was a limited scope inspection, which focused on assessing your compliance with the provisions of Part 21 of Title 10 of the Code of Federal Regulations (10 CFR Part 21) "Reporting of Defects and Noncompliance," and selected portions of Appendix B to 10 CFR Part 50, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants." This NRC inspection report does not constitute NRC endorsement of your overall quality assurance (QA) or 10 CFR Part 21 programs.

Based on the results of this inspection, the NRC has determined that one Severity Level IV violation of NRC requirements occurred. The violation is cited in the enclosed Notice of Violation (Notice) and the circumstances surrounding it is described in detail in the subject inspection report. The violation is being cited in the Notice because NRC inspectors identified that IQC failed to meet the requirements set forth in 10 CFR Part 21 for: 1) an appropriate procedure to evaluate deviations and failures to comply, and 2) specifying the adequate time limits for reporting as required by 10 CFR Part 21.21.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. The NRC will use your response, in part, to determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosures, and your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html. To the extent possible, your response should not include any personal privacy, proprietary, or Safeguards Information so that it can be made available to the Public without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request that such material is withheld from public disclosure, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim (e.g., explain why the

T. Paserba -2-

disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information). If Safeguards Information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Sincerely,

/RA/

Patrick L. Hiland, Director Division of Engineering Office of Nuclear Reactor Regulation

Docket No.: 99901389

Enclosures: 1. Notice of Violation

2. Inspection Report 99901389/2010-201

3. Attachment

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Sincerely,

/RA/

Patrick L. Hiland, Director Division of Engineering Office of Nuclear Reactor Regulation

Docket No.: 99901389

Enclosures: 1. Notice of Violation

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3. Attachment

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NOTICE OF VIOLATION

International Quality Consultants, Inc. 106 Freeport Rd Butler, PA 16002 Docket Number 99901389 Inspection Report No. 99901389/2010-201

Based on the results of a Nuclear Regulatory Commission (NRC) inspection conducted June 1 to June 3, 2010, of activities performed at International Quality Consultants (IQC), one violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

A. 10 CFR Part 21, Section 21.21(a), "Notification of failure to comply or existence of a defect and its evaluation," states in part that, "each individual, corporation, partnership, or other entity subject to 10 CFR Part 21 shall adopt appropriate procedures to evaluate deviations and failures to comply associated with substantial safety hazards as soon as practicable and, except as provided in paragraph (a)(2) of this section, in all cases within 60 days of discovery, in order to identify a reportable defect or failure to comply that could create a substantial safety hazard, were it to remain uncorrected. Ensure that if an evaluation cannot be completed within 60 days from discovery of the deviation or failure to comply, an interim report is prepared and submitted to the Commission. The interim report should describe the deviation or failure to comply that is being evaluated and should also state when the evaluation will be completed."

Contrary to the above, as of June 3, 2010;

IQC's 10 CFR Part 21 implementing procedure IQC 800, "Reporting of Defects and Noncompliance per 10 CFR 21," dated January 19, 2009, was not an appropriate procedure to ensure effective identification and evaluation of deviations and failures to comply associated with a substantial safety hazard. Specifically, implementing procedure IQC 800:

- 1. Did not contain guidance on how to evaluate deviations in accordance with 10 CFR Part 21 requirements.
- 2. IQC 800 did not specify the adequate time limits for reporting as required by 10 CFR Part 21.21.

This issue has been identified as Violation 99901389/2010-201-01.

This is a Severity Level IV violation (Supplement VII).

Pursuant to the provisions of 10 CFR 2.201, "Notice of Violation," you are required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555-0001, with a copy to the Director, Division of Engineering, Office of Nuclear Reactor Regulation, within 30 days of the date of the letter transmitting this Notice of Violation. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include: (1) the reason for the violation, or, if contested, the basis for disputing the violation; (2) the corrective steps that have been taken and the results achieved;

(3) the corrective steps that will be taken to avoid further violations; and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. Where good cause is shown, consideration will be given to extending the response time.

If you contest this enforcement action, you should also provide a copy of your response, with the basis for your denial, to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

Because your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agency-wide Documents Access and Management System (ADAMS), to the extent possible, it should not include any personal privacy, proprietary, or Safeguards Information so that it can be made available to the public without redaction. ADAMS is accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information). If Safeguards Information is necessary to provide an acceptable response, please provide the level of protection, described in 10 CFR 73.21.

Dated this 8TH day of July, 2010.

U.S. NUCLEAR REGULATORY COMMISSION OFFICE OF NUCLEAR REACTOR REGULATION DIVISION OF ENGINEERING VENDOR INSPECTION REPORT

Docket No.: 99901389

Report No.: 99901389/2010-201

Vendor: International Quality Consultants, Inc.

106 Freeport Rd Butler, PA 16002

VENDOR CONTACT: Ernest Yockey

Vice President

Phone: (724) 284-3738

E-Mail: ecyockey@iqcconsulting.com

Nuclear Industry: International Quality Consultants, Inc. provides safety-related

services to commercial nuclear power plants in the fields of inspection, non destructive evaluation, quality manager system

development and training.

Inspection Dates: June 1 – June 3

Inspection Team Leader: Jonathan Ortega-Luciano, DE/NRR

Inspector: Aaron Armstrong, DE/NRR

Approved by: Martin Murphy, Chief

Quality & Vendor Branch Division of Engineering

Office of Nuclear Reactor Regulation

EXECUTIVE SUMMARY

International Quality Consultants, Inc. 99901389/2010-201

The purpose of this inspection was to review selected portions of International Quality Consultants, (IQC) Inc. quality assurance (QA) and 10 CFR Part 21 (Part 21) programs. The inspectors focused on IQC's function of supplying safety-related services to NRC-licensed facilities. The inspection was conducted at IQC's facility in Butler, Pennsylvania.

The NRC inspection bases were:

- Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to Part 50 of Title 10 of the Code of Federal Regulations; and
- 10 CFR Part 21, "Reporting of Defects and Noncompliance."

There were no NRC inspections of IQC's facility in Butler, Pennsylvania in the previous five years. The results of this inspection are summarized below.

10 CFR Part 21 Program

The inspectors identified one violation of 10 CFR Part 21(Part 21) with two examples. One example of Violation 99901389/99901389-01 was cited for failure to develop an appropriate procedure to perform an evaluation as specified in Part 21. The second example was cited for failure to specify the adequate time limits for reporting as required by 10 CFR Part 21.21.

Corrective Action

Based on the review of IQC's corrective action and nonconformance process and implementing procedures, and a sample of corrective action requests (CARs), the inspectors determined that IQC's process met the requirements of Criterion XVI of Appendix B to 10 CFR Part 50. No findings of significance were identified.

<u>Audits</u>

Based on the review of IQC's process for performing audits, implementing procedures, and recent audit reports, the inspectors concluded that IQC's process met the requirements of Criterion XVIII of Appendix B to 10 CFR Part 50. No findings of significance were identified.

REPORT DETAILS

1. 10 CFR Part 21 Program

a. Inspection Scope

The inspectors reviewed the International Quality Consultants (IQC) Inc. Quality Assurance Manual (QAM) for Nuclear Facilities, Revision 12, dated January 19, 2009, and procedures that governed the 10 CFR Part 21 (Part 21) program to determine compliance with Part 21. Specifically, the inspectors focused on implementing procedures IQC 800, "Reporting of Defects and Noncompliance per 10 CFR 21," Revision 7, dated January 19, 2009; IQC 4000, "Corrective Actions," Revision 0, dated January 19, 2009; and IQC 2000, "Control of Nonconforming Items," Revision 2, dated January 19, 2009.

The inspectors reviewed QAM Section 16, "Control of Nonconforming items," dated June 1, 2001, and QAM Section 15, "Corrective Action," dated January 19, 2009 of the QAM.

The inspectors discussed the Part 21 process with members of IQC's management to evaluate the vendor's Part 21 program. IQC had not preformed any Part 21 evaluations for the inspectors to review.

b. Observations and Findings

The inspectors noted that IQC 800 provided detailed guidance for reporting a deviation or noncompliance to the customer (licensee) to satisfy Part 21.

During the review of the IQC 800, specifically under section 5.0, "Procedure," the inspectors noted that the procedure did not contain adequate guidance to meet the regulatory requirements of Part 21. Specifically, IQC 800 failed to contain guidance on how to evaluate deviations. This issue is identified as one example of Violation 99901389/2010-201-01.

While reviewing IQC 800, the inspectors also noted that the procedure failed to specify the time limits for reporting as required by 10 CFR Part 21.21. IQC 800 did not contain guidance to perform a Part 21 evaluation within 60 days or how to generate an interim report if an evaluation can not be completed within 60 days from point of discovery. IQC 800 also failed to prescribe to the 2-day period for notification of the NRC following receipt of information by the director or responsible corporate officer. Additionally, IQC 800 lacked provisions to provide written notification to the NRC within 30 days following receipt of information by the director or responsible corporate officer. These issues are identified as a second example of Violation 99901389/2010-201-01.

The inspectors noted that IQC 800, section 5.1.3, stated, "International Quality Consultants, Inc. shall not be responsible for performing the evaluation to determine reportability of the condition. International Quality Consultants, Inc. responsible authority shall report the deviation of noncompliance within 5 days to the licensee who will perform the 10CFR21 reportability evaluation." 10 CFR 21.21(b) does state that if

supplier determines that it does not have the capability to perform the evaluation to determine if a defect exists, then the supplier must inform the purchasers or affected licensees within five working days of this determination so that the purchasers or affected licensees may evaluate the deviation or failure to comply. Inspectors and IQC management discussed the difference in the wording, "shall not be responsible" and "does not have the capability."

c. Conclusions

The inspectors identified one violation of Part 21 with two examples. One example of Violation 99901389/2010-201-01 was cited for failure to develop an appropriate procedure to perform an evaluation as specified in accordance with Part 21 requirements. The second example was cited for failure to specify the adequate time limits for reporting as required by 10 CFR Part 21.21.

2. Corrective Actions

a. <u>Inspection Scope</u>

The inspectors reviewed IQC's policies and procedures governing the implementation of IQC's corrective action program to ensure the procedures provided adequate guidance consistent with the requirements of Appendix B to 10 CFR Part 50 and Part 21. The procedures, documents, and records reviewed within the scope of the inspection in this area included:

- "International Quality Consultants Inc. Quality Assurance Manual for Nuclear Facilities," Revision 12, dated January 19, 2009
- QAM Section 16, "Control of Nonconforming items," Revision 7, dated June 1, 2001
- QAM Section 15, "Corrective Action," Revision 2, dated January 19, 2009
- IQC 4000, "Corrective Actions," Revision 0, dated January 19, 2009
- IQC 2000, "Control of Nonconforming Items," Revision 2, dated January 19, 2009
- [Corrective Action Request] CAR-08-007, "Recommendation: Use of Current Revision of 10CFR21 and NCR Form 3W IQC8000," dated December 22, 2008
- CAR-08-008, "IQC, Inc. has been Identifying Lifetime Records as Permanent," dated December 22, 2008
- CAR-08-009, "Show Evidence of Ownership Reviewing Annual Reviews," dated December 22, 2008
- CAR-08-010, "Certificate of Compliance Should be Implemented into Procedure," dated December 22, 2008
- CAR-08-011, "Examinee's VT-3 Examination did not Meet Requirements of ICQ560," dated January 15, 2009
- CAR-08-012, "Procedure Deficiency: Applicable to IQC800:IQC2000," dated January 15, 2009
- CAR-08-013, "Procedure IQC600 does not Identify Passing Requirements for Written Exam," dated January 14, 2009

- CAR-08-014, "IQC QA Manual Section 16 Lacked Adequate Detail Describing Corrective Action Process," dated January 15, 2009
- CAR-08-015, "Procedure References for Proper Linkage Between Procedure IQC200 and QAM Section II," dated December 2, 2009
- CAR-08-016, "An unauthorized IQC Employee was able to Access the Secondary QA Storage Records after Network Maintenance Overhaul," dated December 2, 2009
- CAR-08-017, "Use of Improper Form for Employee Level III NDT Records," dated December 2, 2009

b. Observations and Findings

QAM Section 15 established the documentation to identify, evaluate, and segregate, if practical, conditions adverse to quality so that they may be promptly identified and corrected. The corrective action scope covered conditions such as failures, malfunctions, and incidents. The inspectors noted that IQC's implementing procedure IQC 4000, established measures for identifying, reporting and correcting conditions adverse to quality and to establish the measures for identifying significant conditions adverse to quality, as well as, the necessary corrective actions required to rectify such conditions.

QAM Section 16 established the controls to identify, document, evaluate, segregate if practical, and disposition of items, services and activities which do not conform to established requirements. The controls that IQC have in place are designed to prevent the inadvertent use or installation of nonconforming items or service. The inspectors also reviewed procedure IQC 2000, that defined the process of identifying rework, repair, use as is or replacement of nonconforming items or services.

The inspectors reviewed a sample of CARs. No findings of significance were identified.

IQC had a nonconformance procedure, but informed inspectors that they do not use the nonconformance process because of the current nature of their service based business. IQC supplies the nuclear industry with trained personnel and utilize their nonconformance process for resolving issues. No nonconformance reports were reviewed at the time of this inspection.

c. Conclusions

Based on the review of IQC's corrective action and nonconformance process, implementing procedures, and a sample of CARs, the inspectors determined that IQC's process met the requirements of Criterion XVI of Appendix B to 10 CFR Part 50. No findings of significance were identified.

3. Audits

a. <u>Inspection Scope</u>

The inspectors reviewed Section 18, "Audits," dated June 6, 2003, and paragraph 2.3.10 of Section 2, "Qualification of Assurance Program," dated March 24, 2008, Section II of IQC's QAM, and implementing procedures that govern the process for internal audits. The procedures, documents, and records reviewed within the scope of the inspection in this area included:

- "International Quality Consultant. Inc. Quality Assurance Manual for Nuclear Facilities," Revision 12, dated January 19, 2009
- IQC 300, "Qualification and Certification of Inspection, Test and Examination, Audit and NDE Personnel," Revision 14, dated November 07, 2006
- IQC 600, "Qualification and Certification of Personnel Performing Internal and External Audits," Revision 6, dated May 10, 2010
- IQC 700, "Planning and Performance of Audit Functions," Revision 4, dated January 19, 2009
- IQC 1000, "Verification of Qualifications," Revision 7, dated March 24, 2008
- IQC-1108-IA, "2008 Annual Internal Audit," audit dates: 11/17-11/18/08
- IQC-1109-IA, "2009 Annual Internal Audit," audit dates: 11/30-12/2/09

b. Observations and Findings

The inspectors noted that Section 18 of IQC's QAM provided a description of the process and requirements for performing audits. This section contained specific requirements such as audit plans, checklists, and information required in the audit report.

IQC 700 described IQC's process for conducting audits. The inspectors noted that Section 11.0 described the different types of audits conducted by IQC personnel. The audits are classified as customer audits, internal audits, and vendor (external) audits. Customer audits are performed by IQC personnel for customers. Customer audits are conducted in accordance with the customer audit program or guidelines. Internal audits are performed by IQC personnel who are independent of any direct responsibilities for performance of the activity been audited. Vendor audits are performed by IQC personnel on direct suppliers of material or services that may impact nuclear or safety-related services. As of June 3, 2009, IQC had not performed any vendor (external) audits. IQC does not maintain an approved vendor list because they do not procure any safety-related materials or services.

When IQC is contracted to perform an "external audit," it will fall under the category of customer audit. IQC will perform an "external audit" for a customer and it will be conducted in accordance with the customer audit program or guidelines. If the customer has not established procedures or guidelines, the Lead Auditor can utilize IQC's audit format. Any finding(s) generated as a result of IQC's audit are entered into the customer's Corrective Action Program. IQC does not assume the responsibility for the evaluation and disposition of the findings unless stipulated in the customer contact.

The inspectors reviewed IQC's most recent internal audits (IQC-1108-IA and IQC-1109-IA). The inspectors noted that IQC performed internal audits of only the sections that

applied to the scope of work performed at IQC. The inspectors noted that the audit findings and observations were minor in nature. No findings of significance were noted related to internal audits.

The inspectors reviewed the qualification records for a sample of auditors and audit team leads. The inspectors verified that all auditors and audit team leads had met the requirements to maintain their qualification in accordance with IQC's program. Specifically, the inspectors verified that all audit team leads had performed at least one audit in the last 12 months. Documentation supporting the qualification of each auditor and lead auditor was well detailed and provided adequate evidence to support the qualification requirements for each auditor had been successfully completed and maintained current.

c. Conclusion

Based on the review of IQC's process for performing audits, implementing procedures, and recent audit reports, the inspectors concluded that IQC's audit program requirements were generally consistent with the regulatory requirements of Criterion XVIII of Appendix B to 10 CFR Part 50. No findings of significance were identified.

6. Training

a. Inspection Scope

The NRC inspectors reviewed IQC's policies and procedures for the indoctrination and training of personnel performing activities affecting quality to assess compliance with the requirements of Criterion II, "Quality Assurance Program," of Appendix B to 10 CFR Part 50 and to assure that proficiency was achieved and maintained. The procedures, documents and records reviewed within the scope of the inspection in this area included:

- "International Quality Consultants Inc. Quality Assurance Manual for Nuclear Facilities," Revision 12, dated January 19, 2009
- IQC 300, "Qualification and Certification of Inspection, Test and Examination, Audit and NDE Personnel," Revision 14, dated November 11, 2006
- IQC 400, "Qualification and Certification of Inspection, Test and Examination Personnel," Revision 8, dated October 19, 2006
- IQC 500, "Qualification and certification of NDE and VT-1, VT-2, VT-3, IWE, and IWL Personnel." Revision 12, dated March 24,2008
- IQC 560, "Written practice for Qualification and Certification of NDE Personnel Per ASME Section XI and ANSI/ASNT CP-189 Requirements," Revision 6, dated March 12, 2008
- IQC 1000, "Verification of Qualifications," Revision 7, dated March 24,2008
- Procurement Documents reviewed:
 - IQC 1000, "Verification of Qualifications," Revision 7, dated March 24,2008
 - IQC 1500, "Constellation Energy Nuclear Group LLC," dated January 15, 2010

- IQC 1446, "NextEra Energy Duane Arnold, LLC," dated July 29, 2008
- IQC 1497, "FirstEnergy Nuclear Corp. Beaver Valley," dated December 21, 2009
- IQC 1442, "Constellation Energy Ginna-Japan," dated July 10, 2008
- IQC 1424, "NextEra Point Beach LLC," dated December 28, 2007

b. Observations and Findings

IQC 300 defined requirements for qualifying, certifying and recertifying personnel that perform inspection, test, examination, audit and nondestructive examination (NDE) functions. IQC 300 contains the requirements and guidance utilized by IQC to qualify inspection and test personnel in accordance with ANSI/ASME NQA-1's latest edition or ANSI 45.2.6 – 1978 Edition. The inspectors noted that IQC 300 provided instructions and defined responsibilities for the training, qualification, and certification of IQC's Nondestructive Testing (NDT) personnel to American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI and American Society for Nondestructive Testing (ASNT)—SNT-TC-1A, 1984 Edition. The inspectors also reviewed IQC 400, which established the qualification, certification and recertification requirements of inspection, test and examination personnel in accordance with ANSI N45.2.6 – 1978 Edition and Regulatory Guide 1.58. IQC 400 identified the methods to be used for establishing and maintaining qualification/certification records for inspection, examination and testing personnel.

For the qualification and certification of NDE personnel, the inspectors reviewed IQC 500, which established the qualification, certification and recertification requirements of NDE and/or VT-1, VT-2, VT-3, IWE, and IWL (visual examination) personnel in accordance with the requirements of ASME Section XI – 1989 Edition and SNT-TC-1A 1980 through 1996 Editions, Second Edition. IQC 500 identified the methods to be used for establishing and maintaining qualification/certification records for NDE and/or VT-1, VT-2, VT-3, IWE, and IWL personnel. The inspectors also reviewed IQC 560 that established the requirements for the training, qualification and certification of NDE personnel whose specific work assignments required knowledge of the technical principles underlying the nondestructive examination they perform, witness, monitor or evaluate. IQC 560 was developed by IQC following the standard established by ANSI/ASNT, CP-189 – 2001 Edition as amended by ASME Section XI – 2004 Edition.

IQC 1000 was utilized by IQC personnel performing the verification of qualification activities for QA/QC Certifications under IQC's QA Program. This procedure provided a process for investigating and documenting the qualifications of potential QA, Quality Control (QC), or NDE employees for nuclear industry assignments. The prescribed methodology is to obtain source documentation, either verbal or written, from an institution, employer, or responsible Owner or Employer's supervisor to independently verify statements provided by the job applicant on his resume or experience profile. Source documentation included information provided first-hand by a knowledgeable and independent individual, documents and records, or copies of documents. This is the

process that IQC followed for hiring highly qualified personnel as requested by the customers.

The inspectors selected a sample of completed work orders to verify the qualifications of the personnel provide by IQC. Specifically, the inspectors reviewed a sample of Procurement Orders (PO) where the customer requested IQC to provide personnel to perform safety-related services at different nuclear power plants. The inspectors reviewed the qualification records of the personnel selected by IQC to verify that all the personnel were qualified in accordance with IQC's procedures and industry guidance. Also, the inspectors observed that inspection and test personnel qualifications were verified annually to ensure that personnel maintain involvement and proficiency in the areas to which they are qualified.

The inspectors did not identify any issues regarding IQC's personnel training records.

c. Conclusion

Based on the review of IQC's training process, implementing procedures, and associated personnel records, the inspectors determined that IQC's process met the requirements of Criterion II of Appendix B to 10 CFR Part 50. No findings of significance were identified.

7. Exit Meeting

On June 3, 2010, the inspectors presented the inspection scope and findings during an exit meeting with IQC's President, Thomas E. Paserba, Ernest C. Yockey, Vice President and other IQC personnel.

ATTACHMENT

1. PERSONS CONTACTED

Thomas E. Paserba, President, IQC Ernest C. Yockey, Vice President, IQC Jeffry S. Thompson, Manager QA/QC, IQC

2. INSPECTION PROCEDURES USED

IP 36100, "Inspection of 10 CFR Parts 21 and 50.55(e) Programs for Reporting Defects and Noncompliance"

IP 43001, "Reactive Inspection of Nuclear Vendors"

3. LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

There were no NRC inspections of IQC's facility in Butler, Pennsylvania in the previous five years.

<u>Item Number</u>	<u>Status</u>	<u>Type</u>	<u>Description</u>
99901389/2010-201-01	Opened	NOV	Part 21

4. LIST OF ACRONYMS USED

ADAMS Agency-wide Documents Access and Management System

ASME American Society of Mechanical Engineers
ASNT American Society for Nondestructive Testing

CAR Corrective Action Report

IQC International Quality Consultants, Inc.

NDE Nondestructive Examination
NDT Nondestructive Testing
Notice Notice of Violation

NRC Nuclear Regulatory Commission

Part 21 10 CFR Part 21
PO Purchase Order
QA Quality Assurance

QAM Quality Assurance Manual

QC Quality Control US United States