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Document Type		Quality Assurance Document (QAD)			
Document Title		Audit Report for Dekra Industrial RSA (Pty) Ltd.			
M-Files Number:		QRPT000461 Rev 00			
Auditee: Dekra Industrial (Pty) Ltd.					
Audit Scope: RD-0034 Level 2 Requirements and QN-100 E Rev G Pre-Evaluation Questionnaire for Suppliers – specifically the gaps identified during the gap assessment as documented within QRPT000328.					
Audit Team Leader: S.W. Smith Technical Specialist: W.F. Adlem Observer: None					
Audit Date: 23/03/2021 – 25/03/2021			Contact Tel No: 013 243 3177 (Mobile: 063 692 1765) E-mail: eddie.vanhansen@dekra.com Audit Address: Thos Begbie & Co., Corner Tswelopele Street & Hendrina Road, Middelburg - Mpumalanga		
Persons Contacted	Function or Designation	Department/ Project/Supplier	Opening Meeting	During Audit	Closing Meeting
E. van Hansen	General Manager / QA Manager	Dekra Industrial RSA (Pty) Ltd.	✓	✓	✓
R. Vermeulen	Branch Manager (Western Cape)	Dekra Industrial RSA (Pty) Ltd.	✓	✓	-
M.C. Liebenberg	Level III	Dekra Industrial RSA (Pty) Ltd.	✓	✓	-
Sanette Smith	QA Specialist (Lead Auditor)	Actom – John Thompson Nuclear Department	✓	✓	✓
Wynand Adlem	SHERQ Manager (Technical Specialist)	Actom – John Thompson Nuclear Department	✓	✓	✓
1 Audit Background <p>A gap assessment was conducted on Dekra Industrial RSA (Pty) Ltd. from the 9th to the 11th of November 2020 at their Middelburg office in Mpumalanga. Dekra Industrial RSA (Pty) Ltd.'s scope of work for the SGR Project at Koeberg is classified as a Level 2 in terms of the KNPS – SGR Lot 2 RD-0034 Classification Register (ELST000070 Rev 04). The gap assessment focussed on the RD-0034 Level 2 requirements as well as relevant Framatome QN-100 Supplier Management Requirements, that will be applicable to the Non-Destructive Examination services, provided by Dekra Industrial RSA (Pty) Ltd. Certain gaps within Dekra Industrial RSA (Pty) Ltd.'s Quality Management System were identified as per the gap assessment report QRPT000328.</p> <p>A follow-up audit was held from 23rd March to 25th March 2021, which focused on how Dekra addressed the gaps identified in November 2020, to determine if Dekra Industrial RSA (Pty) Ltd. can be extended and fully approved as a Level 2 Supplier on AJT Nuclear Department's Approved Suppliers List.</p>					
1.2 Audit Summary Areas of good practice / strong points that were identified during the audit are: <ul style="list-style-type: none"> The Quality Manager's positive attitude and commitment towards addressing the identified gap areas, not only for work within the Nuclear environment, but also within their overall Quality Management System, and The availability of the Level III Technician, that is resourced on a full-time contract. <p>A Project Quality Plan specific for the Steam Generator Replacement project was established, although in draft format for the audit and addressed many of the gaps identified during the initial gap assessment.</p> <p>In addition to the Project Quality Plan, certain procedures and forms were established to address the gaps identified and in other instances existing Dekra Industrial RSA (Pty) Ltd. procedures were amended as improvement points whereby the whole of Dekra Industrial RSA (Pty) Ltd. could benefit.</p>					

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After a review of the Quality Management System and the actions taken by Dekra Industrial RSA (Pty) Ltd. on the gaps identified previously, it was concluded that Dekra Industrial RSA meet the minimum requirements as stipulated under RD-0034 Level 2 and QN-100.

The level of implementation through the presented PQP and project specific procedures will be evaluated through the demonstration thereof on an on-going basis as part of process-audits during the SGR Production coupon and pre-fabrication work, prior to the first SGR Outage.

It is recommended that Dekra Industrial RSA be placed on the Nuclear Department's Approved Suppliers List as a RD-0034 Level 2 supplier, subject to the closure of the two (2) findings raised during the audit. Refer to Section 2 of this report for the findings raised during the audit.

1.1 Abbreviations

AIA: Authorized Inspection Agency
 AJT: Actom – John Thompson
 IFS: Important for Safety
 ISO: International Organization for Standardization
 NCR: Non-conformance Report
 ND: Nuclear Department
 NDE: Non-Destructive Examination
 PQP: Project Quality Plan
 RT: Radiographic Testing
 QAP: Quality Assurance Plan (Program)
 QLST: Quality List
 QM: Quality Manual
 QMS: Quality Management System
 RD: Regulatory Document
 RSA: Republic of South Africa
 SGR: Steam Generator Replacement
 SM: Safety Management
 SSC: System, Structure or Component



1.2 Applicable Documents



CLTR000480: Notification of Audit on Dekra Industrial RSA (Pty) Ltd.
 CMEM000322: Audit Notification to Dekra Industrial RSA (Pty) Ltd.
 QLST000055: Audit Checklist for Dekra Industrial RSA (Pty) Ltd. for NDE Services

2 Findings

The following findings were raised during the audit:

Finding No	Requirement	Description of Gap
NCR 001230	<u>QN-100 E Rev G (2.2 b; 2.2 (c); 4.1 (a)) and QN-100 Generic (4.1.1; 6.2.1; Additional Requirement Determining Authenticity (Counterfeit and Suspect Items) and RD-0034 Req. 47:</u> Providing the necessary means for the implementation of the task in order to guarantee the safety. Measures shall be taken to ensure products are authentic and to reduce the risk of introducing counterfeit and fraudulent items.	No disposition in place regarding Dekra Industrial personnel training on Nuclear Safety Culture and Counterfeit and Suspect Items. Proposed that the training be presented and incorporated with the NSC and HP awareness training presented by AJT ND to all sub-suppliers, where by Dekra will utilise the material going forward for indoctrination and awareness topics during the execution of the SGR project scope.

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NCR 001231	QN-100 Rev G (2.4 b) and QN-100 Generic (4.2.1) Is this QMP sent to AJT for review and approval?	The previous gaps identified during the gap assessment in November 2020 could be demonstrated as documented in a draft PQP (DEK-PQP-SGR-AJT-012). This draft PQP needs to be finalized by Dekra Industrial RSA and submitted for review and acceptance by AJT – Nuclear Department.	
3 Observations The following observations were found during the audit:			
Obs. No	Requirement	Description of Observation	
	None		
4 Opportunities for Improvement The following opportunities for improvement are recommended following from the audit:			
OFI No	Requirement	OFI Description	
1	QN-100 E Rev G (2.1 a): The supplier established, implemented, assess and continually improve a QMS complying with ISO 9001 and QN-100?	A draft PQP (DEK-PQP-SGR-AJT-012) was established to address the additional RD-0034, QN-100 & Project specific requirements. At the time of the audit, the draft PQP (DEK-PQP-SGR-012) did not fully address the SGR Project execution aspects. These need to be included and submitted to AJT Nuclear Department, to be reviewed and accepted.	
2	RD-0034 Req.5: Where there is collaboration between different organizations involved in the performance of design, manufacture and/or construction activities, tasks and responsibilities must be defined and documented. The interfaces between these organizations must be clearly defined.	The Level III has been added to the Organizational Roles, Responsibilities and authorities procedure (DEK-QMS-008 Rev 01). Dekra is in the process to establish a specific job description for the Level III as he is moving into a new position "Advance Technology / NDT Manager". The responsibilities and authorities of the Dekra SGR Project Manager has also been included within the Organizational Roles, Responsibilities and authorities procedure (DEK-QMS-008 Rev 01).	
3	RD-0034 Reg. 41: The authority and responsibilities of the person and organisational units performing activities affecting quality and / or nuclear safety must be clearly established and defined in writing	Nuclear Safety authority and responsibility will be added to DEK-QMS-019 Rev 00 (HSE Manager) and the Project Manager for the SGR Project.	
4	RD-0034 Reg. 78: The licensee must establish a supplier qualification based on and graded according to an accepted safety and quality classification system of the product to be delivered by the supplier.	The Externally Provided Products and Services Procedure (DEK-QMS-042 Rev 00) needs to be updated to include reference to the Supplier Score card Template.	
5	RD-0034 Reg. 88: Procurement documents for material, equipment and services must include or reference the procedures and / or standards required to be applied by the supplier.	At the time of the gap assessment, standards to be applied by the supplier, was not yet included in Procurement documents. Requirements are included on the Purchase Orders to the suppliers.	

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		Dekra to investigate how to communicate the relevant standards used by the suppliers.			
6	<u>QN-100 Generic (8.2.1):</u> Does information used to monitor and used for the evaluation of customer satisfaction include: <ul style="list-style-type: none"> • product conformity, • on-time delivery performance, • customer complaints, • corrective action requests, and • implementation of safety culture. 	A section for nuclear safety culture will be included on the customer satisfaction survey, after the project has started.			
5 Response The response to the above audit findings to be as follows: <ul style="list-style-type: none"> (i) Findings (NCR's) raised should be addressed, completed on the AJT Nuclear Department NCR's provided and returned to AJT Nuclear Department. (ii) The Opportunities for Improvement identified should be addressed and evidence thereof provided to AJT Nuclear Department. 					
Action	Name	Designation	Signature	Date	
Prepared	S.W. Smith	Lead Auditor	Approval on M-Files	2021/03/29	
Reviewed	W.F. Adlem	Technical Specialist	Approval on M-Files	2021/03/30	
Reviewed	H. du Toit	ND SGR Project Manager	Approval on M-Files	2021/04/01	
Approved	W.F. Adlem	ND SHERQ Manager	Approval on M-Files	2021/04/01	
Distribution	M-Files and Dekra Industrial RSA (Pty) Ltd.				