AREVA

January 28th, 2008

ELP Letter: 08038

Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Subject: Reply to Notice of Nonconformance

Ref. 1: Letter, Patrick L. Hiland (NRC) to L.D. Patterson (AREVA), "NRC Inspection Report 99901355/2007-202, Notice of Nonconformance" December 28, 2007.

AREVA NP, Inc's reply to Notice of Nonconformance (Reference 1) is enclosed in Attachment A. As discussed in the attachment, certain corrective actions have already been taken while other actions are in the process of being taken. AREVA NP Inc. is confident that these corrective actions will prevent further nonconformance in this area.

AREVA NP Inc. views this matter with the utmost seriousness and is fully committed to the courses of action set forth in this reply.

Sincerely,

FOR LAURENCE PATTERSON

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This purpose of this document is to provide a response to the subject inspection report that provides the results of a Nuclear Regulatory Commission (NRC) inspection conducted during the period of November 27-30, 2007, of activities performed at Eaton Cutler-Hammer's facility in Greenwood, South Carolina by AREVA NP Inc. (AREVA). The report identifies several activities that were not conducted in accordance with NRC requirements which were contractually imposed upon AREVA by a NRC licensee.

Notice of Nonconformance 99901355/2007-202-01

A. Criterion XI, "Test Control," of Appendix B to 10 CFR Part 50, states in part that, "A test program shall be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents. Test results shall be documented and evaluated to assure that test requirements have been satisfied."

AREVA Quality Management Manual 56-5015885-07 issued June 1, 2007, Section 4.5.4, "Inspection and Test Status," states in part that, "The requirements placed by PLANTS on their own Units and their suppliers include the use of the inspection program or inspection plan/test plan/manufacturing sequence plan as a follow-up document which is filled in as work progresses. In this way it is possible to know, at any time, which inspection and test operations have been performed."

AREVA dedication procedure, DP-O1-67, "Eaton Electrical, inc.. Cutler-Hammer Type MAVR-350-1200 and MA-VA-350-200 Medium Voltage Vacuum Replacement Circuit Breakers," Revision 5, specifies the critical characteristics that must be tested to provide reasonable assurance that the item will perform its intended safety function.

AREVA Operating Instruction, OI-1580, "Acceptance Testing of Type MA-VR Vacuum Replacement Breakers," Revision 0, establishes the guidelines for performing the functional acceptance tests unique to the type of breaker.

AREVA Operating Instruction, OI-1513, "Technical Evaluations and Commercial Grade Dedication," Revision 0, states that, "The acceptance inspection/tests listed in section 12 of the dedication plan will be performed and test/inspection results will be documented as Sat or Unsat."

Contrary to the above:

1. Functional acceptance testing of the truck operated contacts (TOCs) as specified in the referenced dedication plan was absent from the implementing document, OI-1580, "Acceptance Testing of Type MA-VR Vacuum Replacement Breakers," Revision 0.

2. Three functional acceptance tests required by OI-1513, Revision 0, were performed. However, the corresponding test results were not documented since the data form in OI-1580, Revision 0, lacked a block to enter the test results.

AREVA NP Inc. Response to Nonconformance 99901355/2007-202-01

Background:

Nonconformance 99901355/2007-202-01 accurately identifies the requirement for documented technical evaluations and equipment inspections and tests to verify that the commercial grade equipment to be dedicated is acceptable for safety related use as identified in applicable procurement documentation. The plans and procedures to identify and document these evaluations, inspections and tests are documented in the above referenced procedures. These documents are developed under the guidance of AREVA policy and procedure, as well as applicable industry and governmental regulations and standards. Procedures must accurately support plans that are developed to document the requirements of equipment dedication. Accurate and complete documentation of the results of evaluations, inspections and tests must be the product of the dedication process to provide satisfactory evidence of the acceptability of the equipment for its intended safety related application. Concerns regarding the extent of this issue are mitigated by successful on-site installations without any reports of problems involving the TOC.

Reason for the nonconformance:

When performed properly the plans and procedures identified in the nonconformance: OI-1513, "Technical Evaluations and Commercial Grade Dedication," Revision 0, DP-O1-67, "Eaton Electrical, inc.. Cutler-Hammer Type MAVR-350-1200 and MA-VA-350-200 Medium Voltage Vacuum Replacement Circuit Breakers," Revision 5 and OI-1580, "Acceptance Testing of Type MA-VR Vacuum Replacement Breakers," Revision 0, result in an acceptable dedication program. In the examples noted, the following reasons existed for the nonconformance, as identified in the contradictions above:

1. The omission of functional acceptance testing of the Truck Operated Contacts (TOC) in the applicable operating instruction, OI-1580, "Acceptance Testing of Type MA-VR Vacuum Replacement Breakers," Revision 0 was an oversight due to human error. Documentation of identified inspections and/or test to fulfill the requirements of DP-O1-67, "Eaton Electrical, inc.. Cutler-Hammer Type MAVR-350-1200 and MA-VA-350-200 Medium Voltage Vacuum Replacement Circuit Breakers," Revision 5, must be specified in the implementing document, as noted by Item 1 of the nonconformance.

2. The omission of proper documentation of three functional acceptance tests as identified in the dedication plan DP-O1-67, "Eaton Electrical, inc.. Cutler-Hammer Type MAVR-350-1200 and MA-VA-350-200 Medium Voltage Vacuum Replacement Circuit Breakers," Revision 5, was the result of using commercial supplier documentation as part of commercial grade item dedication. The operating instruction developed to perform the dedication inspections and tests, OI-1580, "Acceptance Testing of Type MA-VR Vacuum Replacement Breakers," Revision 0, uses a checklist format to guide the process and document the results. Inspections and tests performed by the commercial grade item supplier had been used as part of the dedication process and were not included in appropriate dedication documentation.

Corrective actions:

1. Inspections will be added to the checklist associated with OI-1580 to ensure proper configuration and operation of the TOC to address Item 1 of the nonconformance. Verification that the line items specified by the checklist are in accordance with all other dedication plans, procedures and documents will be completed as a part of the revision to OI-1580.

Schedule for completion: February 11th, 2008.

2. The dedication plan (DP-O1-67) and the checklist associated with the inspection and test implementing document (OI-1580) will be revised to include all test data used in performance of the dedication process.

Schedule for completion: February 11th, 2008.

Corrective actions to prevent recurrence:

It is required to take appropriate actions to provide the best assurance possible that the reasons for the nonconformance are addressed. To complete this requirement a letter will be issued to all personnel involved in the dedication process reinforcing there understanding of compliance to the approved operating instructions and associated AREVA procedures. Personnel responsible for

implementation of the dedication process will be participate in training to assure their understanding of applicable operating instructions and procedures.

Scheduled completion date: March 28th, 2008

Notice of Nonconformance 99901355/2007-202-02

B. Criterion II, "Quality Assurance Program," of Appendix B to 10 CFR Part 50, states in part that, "The program shall provide for indoctrination and training of personnel performing activities affecting quality as necessary to assure that suitable proficiency is achieved and maintained."

AREVA Quality Management Manual 56-5015885-07, issued June 1, 2007, Section 3.2.3, Formal Qualification," states in part that, "Within PLANTS, the personnel performing audits, inspections, tests, any specific technical process or non-destructive examination are formally qualified according to implementing procedures."

Contrary to the above, Eaton Cutler-Hammer personnel performing testing activities in support of commercial-grade dedication of circuit breakers did not have documentation as being formally qualified in accordance with implementing procedures.

AREVA NP Inc. Response to Nonconformance 99901355/2007-202-02

Background:

The use of a commercial supplier facility, their personnel and equipment is required to most efficiently and effectively support the performance of commercial grade item dedication of the Medium Voltage – Vacuum Replacement Circuit Breakers which are the subject of this nonconformance. Other means and methods to perform this process are possible, but require logistics such as extensive shipping and handling of such large pieces of equipment that performance of dedication activities at the final place of commercial grade manufacturing is desirable and appropriate. Notice of Nonconformance 99901355/2007-202-02 accurately identifies that personnel used to support the performance of commercial grade item dedication should be trained to ensure adherence to the requirements of industry and governmental standards and regulations, as well as dedication procedures and instructions.

Reason for the nonconformance:

Previous interpretations of the applicable standards, regulations, and procedures by the personnel performing dedication of the subject equipment relied on supervision of the dedication activities by authorized personnel who were properly trained. Training of supplier personnel that provide support to the dedication process at the commercial grade manufacture had not been considered necessary to adequately conform to the applicable procedures.

Corrective actions:

Prior to the performance of dedication activities at a commercial facility, supplier personnel will be provided with training to applicable regulatory requirements, such as "Part 21 Awareness" and applicable AREVA procedures. AREVA personnel responsible for the supervision and approval of dedication inspections and tests will be trained on operation of applied Measurement & Test Equipment (M&TE). The appropriate revisions to procurement documentation will be completed to ensure acceptable performance of required personnel training, prior to the next demand for dedication activities at the supplier facility and supported by supplier personnel.

Scheduled completion date: February 13th, 2008

Corrective actions to prevent recurrence:

To provide the best assurance that this problem will not recur, an instruction to require compliance to applicable standards, regulations and procedures, along with associated training of AREVA personnel involved in dedication activities will be performed. A commercial grade survey to confirm Eaton Cutler-Hammer personnel qualifications and completion of aforementioned training programs will be performed.

Scheduled completion date: March 28th, 2008

Notice of Nonconformance 99901355/2007-202-03

C. Criterion XII, "Measuring and Test Equipment," of Appendix B to 10 CFR Part 50, states in part that, "Measures shall be established to assure that tools, gages, instruments, and other measuring and testing devices used in activities affecting quality are properly controlled, calibrated and adjusted at specified periods to maintain accuracy within necessary limits."

AREVA Quality Management Manual 56-5015885-07 issued June 1, 2007, Section 4.6, "Control of Measuring and Test Equipment," states in part that, "For subcontracted inspection and testing, purchase orders impose requirements on

suppliers concerning the control of the measuring and test equipment they utilize."

Contrary to the above, AREVA PLANTS' Purchase Order 1007003503, dated February 8, 2007, to Eaton Electrical-Vistaline, failed to impose the above requirements for the use and control of measuring and test equipment on their supplier (Eaton Cutler-Hammer). The referenced purchase order addresses the procurement of several 4160-volt circuit breakers dedicated by AREVA for the Farley Nuclear Plant.

AREVA NP Inc. Response to Nonconformance 99901355/2007-202-03

Background:

The use of a commercial supplier facility, their personnel and equipment is required to most efficiently and effectively support the performance of commercial grade item dedication of the Medium Voltage – Vacuum Replacement Circuit Breakers which are the subject of this nonconformance. Other means and methods to perform this process are possible, but require logistics such as extensive shipping and handling of such large pieces of equipment that performance of dedication activities at the final place of commercial grade manufacturing is desirable and appropriate. Notice of Nonconformance 99901355/2007-202-03 accurately identifies that equipment, most specifically applied Measurement and Test Equipment (M&TE) used to support the performance of commercial grade item dedication should be controlled to ensure the requirements of industry and governmental standards and regulations are met, and the M&TE is acceptable for the performance of dedication testing.

Reason for the nonconformance:

Previous interpretations of the applicable standards, regulations, and procedures by the personnel performing dedication of the subject equipment relied on specification of an approved calibration supplier for acceptability and inspection of calibration documentation by authorized AREVA personnel. Such controls were interpreted as acceptable for the use of commercial supplier M&TE to support the performance of commercial grade item dedication.

Corrective actions:

To provide assurance that the M&TE used in dedication testing is properly controlled, appropriate procurement documentation will be revised to include additional controls of M&TE. These controls, which will include the pass down of NIST traceability requirements and notification of out-of-tolerance conditions, will

be reviewed and evaluated for acceptability as part of a commercial grade survey to be performed at the Eaton Greenwood Power Breaker Center. Also addressed will be confirmation that Eaton has a procedure in place that establishes requirements for controlling M&TE consistent with 10 CFR 50 Appendix B, that the procedure requirements are being properly implemented and that only qualified supplier personnel will operate the M & TE used for the purposes of equipment dedication. Additionally, AREVA will continue to review M&TE certifications to assure that controls provided by the supplier were sufficient to maintain the equipment in calibration.

Scheduled completion date: February 13th, 2008

Corrective actions to prevent recurrence:

To provide the best assurance that this problem will not recur, an instruction to require compliance to applicable standards, regulations and procedures will be provided to all AREVA personnel involved in the dedication process. Training to reinforce the instruction will be provided to AREVA personnel involved in dedication activities. AREVA will perform a commercial grade survey to confirm Eaton Cutler-Hammer's specific control of M&TE used for Dedication and the procurement process for their acquisition of M&TE calibration services and M&TE out-of-tolerance requirements to their calibration sub-suppliers.

Scheduled completion date: March 28th, 2008

Notice of Nonconformance 99901355/2007-202-04

D. Criterion III, "Design Control," of Appendix B to 10 CFR Part 50, states in part that, "Measures shall also be established for the selection and review for suitability of application of materials, parts, equipment, and processes that are essential to the safety related functions of the structures, systems and components. "Additionally, Criterion III states in part that, "The design control measures shall provide for verifying or checking the adequacy of design, such as by the performance of design reviews, by the use of alternate or simplified calculational methods, or by the performance of a suitable testing program."

AREVA Quality Management Manual 56-5016885-07, issued June 1,2007, Section 4.3.7, "Control of Design and Development Changes," states, "Any change occurring during a study or design analysis, relating to documents, databases or software that are already applicable, is the subject of an analysis to assess its justification, its technical consequences, and its impact on the product and associated risks."

Section 7.5 of AREVA Operating Instruction OI-1513, "Technical Evaluations and Commercial Grade Dedication," Revision 0, states that the basis for acceptability of any critical design differences between original and replacement items, including acceptability for Seismic and Environmental Qualification requirements as applicable must be documented in the conclusion section of the Technical Evaluation or the Equivalency Determination (ED) database.

Contrary to the above:

1. AREVA's Technical Evaluation, DP-01-67, "Eaton Electrical, Inc. Cutler-Hammer
Type MA-VR-350-1200 and MA-VR-350-2000 Medium Voltage Vacuum Replacement Circuit Breakers/' Revision 5, failed to adequately document the basis for acceptability of any critical design differences between original and replacement items.

2. AREVA's review of Equivalency Determinations associated with DP-01-67, ED.136.MA-VR, Revision 3, ED.137.MA-VR, Revision 5, and ED.140.MA-VR, Revision 2, failed to provide adequate documentation to support the basis of the engineering design review conclusions.. In multiple instances, the EDs merely acknowledged that an equivalent change was made to the breaker without providing information to support the justification, technical consequences, or impact on the product and associated risks.

AREVA NP Inc. Response to Nonconformance 99901355/2007-202-04

Background:

In accordance with proper development of the dedication plan by proper implementation of OI-1513, a technical evaluation is completed to identify design changes from the most recent equipment qualification or dedication, whichever is most recent. The design changes are evaluated for impact on equipment qualification, including fit, form and function, with special attention to the safety related function of the equipment. An equivalency determination is performed which is required to included documentation of the reasons for design change acceptability, as well as the conclusion as to acceptability. Notice of Nonconformance 99901355/2007-202-04 accurately identifies that the reasons for acceptability of design changes is not adequately documented.

Reason for the nonconformance:

1. The reason for the nonconformance is an oversight due to the improper interpretation of operating instructions by engineering personnel resulting in undocumented justification of acceptability of critical design changes.

Corrective actions:

To address the nonconformance critical design changes will be identified and reviewed with the reason for acceptability added to the dedication plan.

Scheduled completion date: February 13th, 2008

Corrective actions to prevent recurrence:

To provide the best assurance that this problem will not recur, an instruction to require compliance to applicable standards, regulations and procedures, along with associated training of AREVA personnel involved in dedication activities will be performed.

Scheduled completion date: March 28th, 2008

Reason for the nonconformance:

2. The reason for the nonconformance is an oversight due to the improper interpretation of operating instructions by engineering personnel resulting in undocumented justification of acceptability of critical design changes.

Corrective actions:

The design changes will be reviewed and the reason for acceptability of each design change will be added to the equivalency determination (ED).

Scheduled completion date: March 28th, 2008

Corrective actions to prevent recurrence:

To provide the best assurance that this problem will not recur, an instruction to require compliance to applicable standards, regulations and procedures, along with associated training of AREVA personnel involved in dedication activities will be performed.

Scheduled completion date: March 28th, 2008

AREVA NP Inc. Response to Notice of Nonconformance 99901355/2007-202-05

Notice of Nonconformance 99901355/2007-202-05 accurately identifies that in some instances the AREVA NP screening team did not answer the 10 CFR Part 21 questions correctly.

Reason for the Nonconformance

The CRs reviewed by the NRC team associated with the Eaton – Cutler Hammer Type Medium Voltage Vacuum Replacement circuit breaker nonconformances were written to require further evaluation of the conditions identified by the customer to determine why the AREVA NP Dedication Process did not identify the nonconforming conditions and to establish actions to prevent similar conditions in the future. The nonconforming hardware conditions were identified and processed by the customer under the customer's Corrective Action Program. Since the hardware deviations were identified and processed in accordance with the customer's corrective action program, the screening team answers to the 10 CFR Part 21 questions focused on the need to prevent similar problems and in some instances did not consider the hardware deviations when screening the CRs for potential reportability.

Background:

NRC nonconformance regarding 10 CFR Part 21 implementation in July 2006 (Notice of Nonconformance (NON) 99901 35912006/201-02)

During the period July 18-21, 2006, the U.S. Nuclear Regulatory Commission (NRC) conducted an inspection (NRC Inspection Report 99901 35912006/201) at the AREVA NP Inc. facility in Lynchburg, VA in part to verify that AREVA NP Inc. had implemented a Part 21 program that meets NRC requirements and to review the AREVA NP Inc. Corrective Action Program. This inspection resulted in Notice of Nonconformance (NON) 99901 35912006-201-02, which identified the following regarding 10 CFR Part 21 implementation:

Criterion V, "Instructions, Procedures, and Drawings," of Appendix B to 10 CFR Part 50, states, in part, that 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.

The AREVA NP Plants QEM Manual, Section 1.4 states, in part, that the quality and environment records are records, which provide objective evidence of the activities carried out or the results of these activities.

AREVA NP Inc. Administrative Procedure 1717-06, Revision 1, establishes, in part, the process for determining if a nonconformance/problem/concern needs to be evaluated for reporting under 10 CFR Part 21. Specifically, Section 7 defines a Safety Significant issue as an issue (nonconformance) identified in a CR that is a potential deviation and AREVA NP Inc., "Records Management Program Manual (1E1)," Revision 20, dated May 22,

2006, states, in part, that all Part 21 documentation is considered a lifetime record, stored as a scanned image.

Contrary to the above, the NRC inspectors determined that AREVA NP Inc. Administrative Procedure No. 1717-06, Revision 01, did not require adequate justification to be documented for determining a CR was not potentially reportable under 10 CFR Part 21.

AREVA NP Inc. response to NON 99901 35912006-201-02

In response to the NON, AREVA NP implemented a change to the WebCAP tool and revised Corrective Action procedure AP 1717-06 to add the following guidance to provide evidence that individuals performing Screening or Issue Evaluation activities are considering the proper questions when determining if a deficiency is potentially reportable under 10 CFR 21:

Select "yes" to "The condition is potentially reportable under part 21..." if you answer yes or are not sure of the answer to all three of the following questions (see Part 21 Determination Flow chart in Help File):

1. Does the condition affect a basic component designed/fabricated under a 10 CFR Part 50 Appendix B QA Program or one that has successfully completed dedication? A basic component is a structure, system or component or part thereof that affects a nuclear power plant safety function necessary to assure the integrity of the reactor coolant pressure boundary, the capacity to shut down the reactor and maintain it in a safe condition or the capacity to mitigate the potential for off-site exposure.

2. Is the condition a Deviation to a technical requirement included in a procurement document?

3. Could the Deviation create a substantial safety hazard that could cause a major reduction in the degree of protection provided to public health or nuclear reactor power plant/facility safety?

NRC Acceptance of AREVA NP Inc. Proposed Actions

A letter from the NRC dated October 5, 2006, accepted the AREVA NP response. The NRC letter stated, "your proposed corrective actions appear to be adequate to address our concerns. The staff may review the implementation of your corrective action during a future NRC Inspection to determine that full compliance has been achieved and will be maintained."

NRC Review of AREVA NP Inc. Implementation of NON 99901 35912006-201-02 Actions

As part of an inspection during the period October 9-12, 2007, the NRC staff reviewed the implementation of the AREVA NP Inc. actions to provide evidence that individuals

performing Screening or Issue Evaluation activities are considering the proper questions when determining if a deficiency is potentially reportable under 10 CFR 21. The NRC Inspection Team considered the actions to correct this noncompliance 35912006-201-02 to be satisfactory, and considered this corrective action closed (NRC Inspection Report 99901359/2007-201).

AREVA NP Inc. Response to Notice of Nonconformance 99901355/2007-202-05

AREVA NP considers that the existing requirements implemented in WebCAP and AP 1717-06 and AP 1707-01 adequately implement 10 CFR Part 21 requirements for determining if a defect exists that requires reporting to the NRC. However, action identified below is being taken to clarify the requirements in WebCAP, AP 1717-06 and/or AP 1707-01 for screening CRs for potential reportability.

As noted above the purpose of the CRs reviewed by the NRC was to evaluate the nonconforming conditions identified by the customer to determine actions required to improve the dedication process/supplier performance. The hardware nonconforming conditions had already been addressed by the customer. AREVA NP considers the inappropriate response to the questions was a lack of understanding by the screening team of the requirement/expectation that even though the condition of these basic components had been evaluated by the customer, that AREVA NP still has the responsibility to evaluate the nonconforming condition for potential 10 CFR Part 21 reportability.

Corrective Steps that Have Been Taken and the Results Achieved

1. Personnel associated with the screening of these CRs have been counseled and retrained on the requirements and expectations for screening CRs to determine if the condition is potentially reportable under 10 CFR Part 21.

2. CR 2007-5963 was written to identify nonconformances with the Eaton – Cutler Hammer Type Medium Voltage Vacuum Replacement circuit breakers that are potentially reportable under 10 CFR Part 21. AREVA NP determined that the nonconforming conditions identified in the CR were not reportable defects.

3. As an interim measure to assure these interim actions are effective, AREVA NP Inc. QA and Regulatory Affairs are periodically (depending on the number of CRs written, but at least monthly) reviewing CRs to verify proper implementation of the requirements for screening to determine if the reported condition is potentially reportable under 10 CFR Part 21. These reviews will continue until the actions listed below are implemented and determined to be effective.

Corrective Steps that Will Be Taken to Avoid Further Noncompliance

1. Perform a rollout to AREVA NP Inc. employees to make them aware of this finding and to review/clarify requirements for screening CRs for potential reportability under 10 CFR Part 21.

Completion Date – February 29, 2008

2. In addition to the rollout to all employees identified above, action will be taken to improve the formal training of personnel screening Condition Reports to determine if a condition is potentially reportable under 10 CFR Part 21. This formal training will be provided to AREVA NP Inc. personnel screening CRs.

   Completion Date – August 29, 2008

3. Clarify the requirements in WebCAP and AP 1717-06 and/or AP 1707-01 for screening CRs for potential reportability conditions. As a minimum AP 1717-06 will be revised to:

   - Clarify that a deviation to a procurement document exists even when the nonconforming condition to a technical document is identified by a supplier, customer, regulator or other outside agency, even if the condition has been identified and processed in accordance with that organization's QA/Corrective Action Program.

   - Include the definition of a basic component as part of step 4.4.1.5.

   Completion Date – February 29, 2008