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### Reply to a Notice of Violation

To: United States Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC. 20555-0001  
Re: Docket No. 99900067  
Report No. 99900067/2013-201

February 11, 2014

Subject: Nuclear Regulatory Commission Inspection Report No. 99900067/2013-201, Notice of Violation and Notice of NonConformance. Response to August 29, 2013 Letter.

Violation 99900067-2013-201-01

With respect to NRC letter Dated to BWC December 24, 2013. BWC has reviewed the response letter and proposes the following.

After further review of the Sheffield Forgemasters Purchase Order and a survey of Sheffield Forgemasters it is apparent that Sheffield Forgemasters does meet the requirements of 10 CFR 50 Appendix B with an ASME QSC (Cert # MO-QSC-557) and recognizes 10 CFR Part 21. The purchase order issued to Sheffield Forgemasters had a Standard technical Note requiring Sheffield Forgemasters to report any defects to BWC directly. This clause is contrary to the requirements of 10 CFR Part 21. BWC has rectified this issue with a Revision to the Standard Technical Note that contains the offending clause. Purchase orders now contain a clause that requires reporting directly to the NRC as well as to BWC.

Further, BWC will establish and implement an evaluation program for all Safety-related material products procured from non-domestic suppliers that do not have a 10 CFR Part 21 program. This program will be communicated to all Customers (Utilities) that presently operate BWC supplied Safety Related equipment.

The purpose of this evaluation is to verify that the Supplier's procedures that govern non-conforming conditions, corrective actions, and conditions adverse to quality are adequately implemented.

This evaluation shall take into account the following characteristics:

1. Review of the supplier's non-conformances and corrective Actions, including technical justifications used to verify the acceptability of non-conforming items;
2. Results of previous oversight activities, source verifications, surveys and receiving inspections;

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3. Operating experience of identical or similar materials furnished by the Supplier; and
4. Results of audits from other sources, such as ASME, NRC or customers.

BWC will perform this evaluation as applicable; to determine any effect of using non-domestic Suppliers that do not have a 10 CFR Part 21 program for the procurement of Safety-related material already delivered to US Nuclear Customers.

A handwritten signature in black ink, appearing to read "Kirt Richardson", with a long horizontal flourish extending to the right.

Kirt Richardson D.BA., B.A.Sc., M.Sc., P.Eng  
Quality Program Manager, Nuclear Equipment, Nuclear Services.

CC:  
Edward H Roach, Chief  
Construction Mechanical Vendor Branch,  
Division of Construction Inspection and Operational Programs  
Office of New Reactors