



February 25, 2002

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

Subject: Reply to Inspection Report 99901349/2002-201

To Whom It May Concern:

The Henry Pratt Company would like to commend the professionalism and openness of the Audit Team that visited our facility on January 28-30, 2002. The Audit Team was very polite in their investigation of our Quality Assurance Program. The Team identified areas of concern, and offered suggestions for corrective action. The audit was a positive learning experience for all Henry Pratt personnel and will ultimately improve our Quality program for years to come.

Sincerely

Rod Burnette  
Manager, Quality Assurance  
Henry Pratt Company

Bob Newkirk  
Plant Superintendent  
Henry Pratt Company

- Enclosures: 1. Reply to a Notice of Nonconformance  
2. 10 CFR Part 21 Evaluation (non-conformance 99901349/02-201-01)  
3. 10 CFR Part 21 Evaluation (non-conformance 99901349/02-201-02)

TE09



U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

Date: 2/25/02

**SUBJECT: REPLY TO A NOTICE OF NONCONFORMANCE**

**Nonconformance (99901349/02-201-01)**

**Corrective Action:** Notification was distributed on 2/22/02 and outlined that **NO** welder will be allowed to weld prior to being approved as a Qualified Welder by the Welding Engineer, documented in the Dixon Nuclear WPS Manual, and confirming the current activity in the Continuity Log Book. Nuclear Method Sheets will not be released to manufacturing if there is no documented, qualified welder for the respective welding procedure. All future orders requiring welding will be thoroughly evaluated for qualified welders by the Project Manager, Welding Engineer, Manufacturing Supervisor, QA Inspectors, and QA Manager. The Weld Engineer has updated the Dixon Nuclear Weld Manual with all respective test results from *Conam Kawin* concurring acceptable test results associated with each WPS and Welding Operator Qualification report (QW-484) as of 2/22/02. The Manufacturing Supervisor has reviewed and verified the accuracy of the Welders Continuity Log Book for all welders and respective weld processes as of 2/22/02. The Weld Engineer has updated the Current Qualified Procedures and Welders List, and distributed with document transmittals to the Project Manager, QA Manager, and Manufacturing Supervisor as of 2/22/02.

**Prevention:** The Project Manager, Welding Engineer, Manufacturing Supervisor, QA Inspectors, and QA Manager will closely scrutinize all future orders that require welding by Henry Pratt personnel. All welding requirements will be validated to the Dixon Nuclear Weld Manual, Current Qualified Procedures and Welders List, and the Welders Continuity Log Book. **NO** welder will be allowed to weld prior to being approved as a Qualified Welder as outlined in the Nuclear Quality Assurance Manual, Issue 4, Rev. 1, Dated April 4, 2000.

**Evaluation:** See attached 10 CFR Part 21 Evaluation

**Nonconformance (99901349/02-201-02)**

**Corrective Action:** Notification was distributed to all Q.A. Inspectors 2/22/02 referencing Section 5.8.2, QAP 5, and QAP 39. In summary, Q.A. Inspectors have the authority to coordinate simple machining and grinding within drawing tolerance and are responsible for documenting the respective corrective action, re-inspection, and final disposition on the "In-Process Inspection Record" form. Henry Pratt Company personnel will comply with the Nuclear Quality Assurance Manual and will **NOT** ship any nuclear components without proper documentation as outlined in Section 5.8.2, QAP 5, and QAP 39 for any nonconformance.

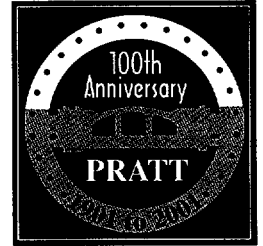
**Prevention:** Henry Pratt personnel will undergo annual training by 3/11/02 with respect to the Nuclear Quality Assurance Manual, Issue 4, Rev. 2, dated February 1, 2002. Section 5.8.2 will again be reinforced to prevent future occurrence.

**Evaluation:** See attached 10 CFR Part 21 Evaluation

Respectfully,

A handwritten signature in cursive script that reads "Rod Burnette".

Rod Burnette  
Manager, Quality Assurance



## 10 CFR Part 21 EVALUATION

**Manufacturing Facility:** Henry Pratt Company  
900 Depot Ave.  
Dixon, IL 61021

Date: 2/22/02

**Discovery Date:** 1/29/02

**NRC Audit Conducted By:** Gregory Cwalina  
Joseph Petrosino  
Tom McLellan

**Docket No:** 99901349

**Non-Conformance (99901349/02-201-01):** NRC Inspectors found that Henry Pratt had permitted an unqualified welder to perform weld operations on a nuclear valve, job number DD570-2. The welder received his formal qualifications approximately two weeks after the weld had been performed.

**Nuclear Sales Order:** DD570-2  
**Weld Requirements:** WP4-4308N REV/3 (GMAW - Inconel 625 Overlay)  
**Part Description:** P/N 950438 (18 N BV DISC CL3)  
**Welder:** Robert Moeller (Stamp 6)

**Nuclear Sales Order:** DD570-3  
**Weld Requirements:** WP7-4308N REV/2 (GTAW – Inconel 625 Overlay)  
**Part Description:** P/N 950409 (10 N BV DISC CL3)  
**Welder:** John Bodmer (Stamp 22)

**Background:** Sales orders DD570-2 & DD570-3 was an expedite order for Northeast Nuclear Energy Co. The Henry Pratt Company was aware of the weld procedures that were required for this specific sales order. Robert Moeller and John Bodmer were the two welders that were selected to conduct the Inconel 625 Overlay on the two respective Discs. Robert and John have over 75 combined years of service with the Henry Pratt Company, and have been qualified and utilized to perform welding on most nuclear job requirements. In this particular case however, the qualifications for both welders were not current, hence we proceeded with the welder qualification tests. A decision was made to go forward with the welding process of applying an Inconel 625 Overlay onto the specified Disc's, prior to the test results conducted by *Conam Kawin*. At that time, had the test results been unacceptable for Robert Moeller or John Bodmer, we would have disassembled the valve, removed the weld, and re-welded after an approved welder performance qualification. In this event, the Henry Pratt Company received a fax indicating satisfactory results from *Conam Kawin* on 1/31/00 for Robert Moeller for weld procedure WP4-4308N REV/3. Additionally, the test results for WP7-4308N REV/2 from *Conam Kawin* for John Bodmer are dated and documented satisfactory on 2/10/00. Although there is no documented phone conversations or faxes, Henry Pratt personnel recalls a verbal acceptance was issued from *Conam Kawin* for John Bodmer's qualification test, prior to order shipment. In addition, John was once qualified for this welding procedure in 5/29/75. Both sales orders were shipped on 2/2/00. The Henry Pratt Company assures that these valves are manufactured in accordance to ASME Sections II, III, V, and IX. There is **NO substantial safety hazard** based on the non-conformance evaluation conducted by Henry Pratt Company personnel.

**Corrective Action:** The Henry Pratt Company will comply with Nuclear Quality Assurance Manual, Issue 4, Rev. 1, Dated April 4, 2000 as outlined in Section 10. Notification was distributed on 2/22/02 and outlined that **NO** welder will be allowed to weld prior to being approved as a Qualified Welder by the Welding Engineer, documented in the Dixon Nuclear WPS Manual, and confirming the current activity in the Continuity Log Book. All future orders requiring welding will be thoroughly evaluated for qualified welders by the Project Manager, Welding Engineer, Manufacturing Supervisor, QA Inspectors, and QA Manager. It will be the responsibility of the Weld Engineer to update the Dixon Nuclear Weld Manual with all respective test results from *Conam Kawin* concurring acceptable test results associated with each WPS and Welding Operator Qualification report (QW-484). It will be the responsibility of the Manufacturing Supervisor to maintain accurate records in the Welders Continuity Log Book for all welders and respective weld processes.



Rod Burnette  
Manager, Quality Assurance



## 10 CFR Part 21 EVALUATION

**Manufacturing Facility:** Henry Pratt Company  
900 Depot Ave.  
Dixon, IL 61021

Date: 2/22/02

**Discovery Date:** 1/29/02

**NRC Audit Conducted By:** Gregory Cwalina  
Joseph Petrosino  
Tom McLellan

**Docket No:** 99901349

**Non-Conformance (99901349/02-201-02):** NRC Inspectors found that Henry Pratt failed to document the final disposition of a nonconforming nuclear component associated with Pratt Shop Order No. DD626-1.

**Henry Pratt Sales Order:** DD626-1

**P.O. Number:** NU04 - 0000004111

**Part Description:** P/N 1795323 (12" N2FII Butterfly Valve P/S w/ Bonnet)

**Quantity:** 1

**Applicable Code:** ASME Section III, Class 3, 1986 Edition, No Addenda

**Background:** NMR 9632 was written on 7-28-00 referencing the 12" N2FII P/S Butterfly Valve Assembly. The nonconformance addressed one 7/8 – 9 UNC threaded hole that had been damaged during the handling process after the valve had been machined, assembled, and tested. To the best of the knowledge of the Inspector, the first 1 – 2 threads was cross threaded due to the wrong eyebolt being fastened to the flange for lifting purposes. The damaged thread was brought to the attention of the Quality Department, and an NMR was written. At that time, machine shop personnel took the responsibility to rework/repair the nonconformance by means of simple machining and grinding within drawing tolerance. The valve was returned to the QA department in which it was re-inspected with a calibrated GO/NO-GO thread gage and was found acceptable. The rework/repair was minor in nature and did not violate Form, Fit, or Function. The valve assembly was shipped on 8/03/00 without documenting the corrective action, re-inspection, and final disposition on an "In-Process Inspection Record". The Henry Pratt Company assures that these valves are manufactured in accordance to ASME Sections II, III, V, and IX. There is **NO substantial safety hazard** based on the nonconformance evaluation conducted by Henry Pratt Company personnel.

**Corrective Action:** The Henry Pratt Company will comply with Nuclear Quality Assurance Manual, Issue 4, Rev. 1, Dated April 4, 2000 as outlined in Section 5.8.2. The Q.A. Inspectors have been informed that they have the authority to coordinate simple machining and grinding within drawing tolerance and to document the corrective action, re-inspection, and make the final disposition on the "In-Process Inspection Record" form. All future nonconformance reports will be referenced on the "In-Process Inspection Record" with the respective corrective action, re-inspection, and final disposition per Section 5.8.2 of the Nuclear Quality Assurance Manual. Q.A. Inspectors were re-trained with regards to Section 5.8.2 on 2/22/02. Section 5.8.2 will be reinforced again during the training session of the Henry Pratt Company Nuclear Training Manual scheduled to be complete by 3/11/02.

*Rod Burnette*

Rod Burnette  
Manager, Quality