



FRAMATOME ANP

An AREVA and Siemens Company

FRAMATOME ANP, Inc.

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

August 25, 2004

Subject: REPLY TO NOTICE OF NONCONFORMANCE (99900001/2004-201-01)

References: 1) NRC Inspection Report No. 99900001/2004-201

**Attachment: 1) Framatome ANP, Inc. Reply to Notice of Nonconformance
2) QC-1415 Rev. 10 Eye Examinations – Visual Inspection Personnel**

Framatome ANP, Inc. (FANP) hereby provides its response to the subject Notice of Nonconformance dated July 27, 2004. This Notice of Nonconformance resulted from an NRC Inspection conducted at our licensed fuel fabrication facility by Stephen Alexander and Kamalakar Naidu on May 25, 2004.

Our response to the stated Nonconformance with NRC requirements is provided in the attachment to this letter.

The NRC Inspection report comments and suggestions are helpful to us in our efforts to improve our programs, to ensure the health and safety of plant personnel and to ensure our compliance with NRC regulations and license conditions.

Please contact me at (434) 832-5276 if you wish to discuss this matter further.

Sincerely,

Charlie F. Holman
Manager, Environmental,
Health, Safety and Licensing
Framatome ANP, Inc.

cc: Theodore R. Quay, Chief
Plant Support Branch
DIPM
NRR

EHSL 04-82

TE09

FANP RESPONSE TO Notice of Nonconformance (NoN) 9990001/2004-201-01

I. Notice of Nonconformance

NRC Inspection Report No. 99900001/2004-201 dated July 27, 2004 documents the NoN as follows:

"...it appeared that certain activities of Framatome...were not conducted in accordance with NRC requirements as set forth below:

A. Criterion V, "Instructions, Procedures, and Drawings," of 10 CFR Part 50, Appendix B, states, in part, that activities affecting quality shall be prescribed by documented instructions, procedures, and drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, and drawings. Instructions, procedures, and drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Contrary to the above, as of May 25, 2004, Framatome Quality Procedure QC-1415, "Annual Eye Examination," Revision 9 dated July 21, 2000, contained an instruction not appropriate to the circumstances, i.e., Step 1.1 of Appendix A to the procedure called for employees about to be given the eye test to fill out the top portion of the test record sheet thus allowing them to see the answers. In addition there were no acceptance criteria provided for the far vision test."

II. Reason for the Nonconformance

The NRC Inspection concluded "...on the basis of employee interviews, review of inspection guides, standard test devices, and other visual aides used in visual inspection of welds and machined or finished parts, and observation of inspection activities, there was no evidence that reliance on this test had adversely affected the quality of inspections performed by personnel interviewed and/or observed."

Based on discussion with employees, the reason for the Nonconformance for the issue of the employees filling out the top of the test record form before the eye examination is that the brief amount of time that it takes to fill out the form was not perceived to be an opportunity for employees to memorize the appropriate responses and affect the outcome of the test. For the issue of no acceptance criteria for the far vision test, the test is given to employees as a service for information purposes, therefore no acceptance criteria has been established. Far vision acuity is not required for Quality personnel; however, since the capability was present the test was given and included in the procedure.

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Attachment 1
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III. Steps Taken to Correct the Items Cited

QC-1414 has been revised (Revision 10) for the following:

1. *The top portion of Vision Test Record is completed after Vision Test is over so employee has no chance to see proper responses to test (Step 9.1).*
2. *The Far Vision Test was deleted since it is not required for personnel performing visual inspections.*
3. *In addition, the Eye examination certification was revised to eliminate references to codes and standards. It now certifies that the eye examinations were given as prescribed in QC-1415.*

IV. Steps Taken to Prevent Recurrence

No additional steps are required to prevent recurrence of this issue.

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Attachment 2**

QC-1415 Revision 10 "Eye Examinations – Visual Inspection Personnel"

FUEL AMERICA ADMINISTRATIVE PROCEDURES MANUAL

		PROCEDURE NO. QC-1415	REV 10
SECTION QUALITY	SUBJECT EYE EXAMINATIONS – VISUAL INSPECTION PERSONNEL		

1.0 **APPLICABILITY:**

Fuel America (Mount Athos Road (MAR)) (10)

2.0 **PURPOSE:**

This procedure defines and outlines the steps to be taken to assure that all MAR personnel performing visual inspection operations receive an eye examination annually. (10)

2.1 **PROCEDURE OWNER:** Manager, Product Quality

3.0 **GENERAL:**

3.1 All MAR Personnel involved with visual inspection of items must have their eyes examined annually in accordance with this procedure. (10)

3.2 Environmental, Health/Safety & Licensing (EHS&L) personnel will administer eye examinations as prescribed in Appendix A of this Procedure. The test given will be the Titmus Visual Standard Test. (10)

3.3 Employees performing visual inspection operations shall have natural or corrected near distance acuity in at least one eye. They must be capable of reading a minimum of Jaeger Number 1 letters at a distance of not less than 14 inches on a standard Jaeger Test Chart (Target 10 on the Vision Test Record). (10)

They shall also be capable of distinguishing and differentiating contrast in at least 5 of the 8 total numbers from the six colored illustrations in the Titmus Test Guide. Alternatively, they may receive a color vision examination to verify their capability of distinguishing color and differentiating contrast between the colors used in the applicable visual inspection activity.

4.0 **FORMS:**

4.1 Eye Examination Certification or equivalent (See Exhibit A of this Procedure for Example) (Included in POPs as Form 22243) (10)

5.0 **PROCEDURE:**

Responsibility: Supervisors

5.1 Coordinate with EHS&L when eye examinations are due for personnel performing visual inspections. The annual examination shall be performed by the end of the month following the month of the original examination. New employees shall not perform visual inspections until they have successfully completed the eye exams. (10)

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Responsibility: EHS&L (10)

5.2 Perform and document eye examinations as prescribed in Appendix A of this Procedure.

Responsibility: Supervisors

5.3 Upon receipt of the Eye Examination Certification from EHS&L, review it and complete the approval section of the Certification (with attached Vision Test Record) and update the applicable personnel records to reflect the results. Notify individuals of any significant changes and the need for corrective lenses when required. (10)

5.4 Perform the following evaluation if it has been determined that any individuals performing visual inspection operations have a vision problem.

- Send the individual for an eye examination by a licensed physician. As a minimum, the eye examination shall meet the criteria described in this procedure. If the employee successfully completes the physician's examination, then the physician's examination will take precedence over the examination by EHS&L. (10)
- If the individual does not pass the physician's eye examination, then review the individual's job assignment and determine if job efficiency and/or safety could be affected. Assign individual to other work area where the vision problem will not degrade the job assignment until corrective lenses can be obtained, if applicable.
- Individuals with vision impairments that cannot be corrected with corrective lenses (color blindness) may be allowed to accept or reject items based on further testing that they are able to determine the difference between acceptable and unacceptable conditions for each application. As a minimum, the individual must demonstrate the capability of distinguishing color and differentiating contrast between the colors used in a particular visual inspection method. This test may be conducted by a licensed professional or by an in-house designed test. Any restrictions on visual inspections must be noted on the Eye Examination Certification.

5.5 File the completed Eye Examination Certification and attached Vision Test Record in local area files. Retain for at least two years.

- END -

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SECTION QUALITY	SUBJECT EYE EXAMINATIONS – VISUAL INSPECTION PERSONNEL		

APPENDIX A: PERFORMANCE & DOCUMENTATION OF EYE EXAMINATIONS

Responsibility: EHS&L (10)

1.0 SETUP OF TITMUS VISION TESTER

1.1 DELETED (10)

1.2 Put a new clean head rest tissue in place prior to testing an individual.

1.3 Push the power switch to on and check the occlude switch to ensure it is operating properly.

2.0 DELETED (10)

3.0 DELETED (10)

4.0 DELETED (10)

5.0 COLOR PERCEPTION

5.1 Power switch at ON

5.2 Lens lever at FAR

5.3 Toggle switch centered

5.4 Dial No. 6 at top

5.5 Instruct the employee to look into the lens of the Vision Tester and identify the numbers in CIRCLES A, B, C, D, E and F

5.6 Document results on the applicable Vision Test Record by crossing out the numerals identified. (10)

6.0 NEAR VISION TESTING BOTH EYES

6.1 Power switch at ON.

6.2 Lens lever at NEAR

6.3 Toggle switch centered

6.4 Dial No. 2 at top

6.5 Instruct the employee to look into the lens of the Vision Tester and identify the Closed Circle

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APPENDIX A: PERFORMANCE & DOCUMENTATION OF EYE EXAMINATIONS

in illustrations 1 through 14

6.6 Document results on the applicable Vision Test Record by crossing out the letter corresponding to the illustration number of the last correctly identified illustration. **(10)**

7.0 NEAR VISION TESTING RIGHT EYE

7.1 Power switch at ON.

7.2 Lens lever at NEAR

7.3 Toggle switch centered

7.4 Dial No. 3 at top

7.5 Instruct the employee to look into the lens of the Vision Tester and identify the Closed Circle in illustrations 1 through 14

7.6 Document results on the applicable Vision Test Record by crossing out the letter corresponding to the illustration number of the last correctly identified illustration.

8.0 NEAR VISION TESTING LEFT EYE

8.1 Power switch at ON.

8.2 Lens lever at NEAR

8.3 Toggle switch centered

8.4 Dial No. 4 at top

8.5 Instruct the employee to look into the lens of the Vision Tester and identify the Closed Circle in illustrations 1 through 14

8.6 Document results on the applicable Vision Test Record by crossing out the letter corresponding to the illustration number of the last correctly identified illustration.

9.0 DOCUMENTATION AND RECORD KEEPING FOR PERSONNEL PERFORMING VISUAL INSPECTIONS (10)

9.1 Complete or have the employee complete the top section of the applicable Vision Test Record. Have employee sign Vision Test Record. Review and sign the Vision Test Record to ensure completion. **(10)**

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APPENDIX A: PERFORMANCE & DOCUMENTATION OF EYE EXAMINATIONS

- 9.2 Complete the Eye Examination Certification (Exhibit A). The acceptance criteria for Color and Near Vision Testing is:
- Color Vision - The employee must be able to distinguish and differentiate contrast in 5 out of the 8 total numbers from the illustrations.
 - Near Vision - The employee must be able to read to at least Target 10 on the applicable Vision Test Record. **(10)**
- 9.3 Sign and forward the Eye Examination Certification with Vision Test Record attached to the employee's Supervisor for review and filing.

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**EXHIBIT A: TYPICAL EYE EXAMINATION CERTIFICATION FOR PERSONNEL
PERFORMING VISUAL INSPECTIONS (10)**
(Included in POPs as Form 22243)

<p>FUEL AMERICA – MOUNT ATHOS ROAD EYE EXAMINATION CERTIFICATION FOR PERSONNEL PERFORMING VISUAL INSPECTIONS</p>	
<p>This will certify that _____ SS NO. _____ has been given the eye examinations required by Procedure QC-1415 for personnel performing visual inspections.</p>	
<p>Corrective lenses worn during the test: <input type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>NEAR VISION: ACCEPTABLE <input type="checkbox"/> UNACCEPTABLE <input type="checkbox"/></p>	
<p>CORRECTIVE LENS REQUIRED TO PERFORM INSPECTIONS: <input type="checkbox"/> YES <input type="checkbox"/> NO</p>	
<p>COLOR VISION: ACCEPTABLE <input type="checkbox"/> UNACCEPTABLE <input type="checkbox"/></p>	
<p>Colors unable to differentiate: _____</p>	
<p>SIGNATURE OF EXAMINER: _____ DATE: _____</p>	
<p><input type="checkbox"/> Employee is approved for visual inspection of items. <input type="checkbox"/> Employee is NOT approved for visual inspection of items. <input type="checkbox"/> Employee is approved for visual inspection of items with the following restrictions: _____</p>	
<p>Comments:</p> 	
<p>SIGNATURE OF MANAGER/SUPERVISOR: _____ DATE: _____</p>	