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Our ref: LTR-NRC-06-60

November 1, 2006

**Subject: "Reply to Notice of Nonconformance Identified in NRC Inspection Report
99901043/2006-201"**

Attached is in response to a nonconformance at Westinghouse RRAS (New Stanton, PA) as documented in letter "NUCLEAR REGULATORY COMMISSION INSPECTION REPORT 99901043/2006-201" dated October 5, 2006.

In the above letter, the NRC documents that Westinghouse had not demonstrated the environmental qualification of Barton Models 763, 763A and 764 pressure transmitter connector assemblies manufactured after the PRIME Measurement Products May 1982 design change to the Barton pressure transmitter connector assembly which removed the heat shrink sleeving over the individual external lead wires extending into the epoxy material. The pressure transmitter connector assemblies were supplied to NRC licensees for use in applications which required components to be environmentally qualified in accordance with 10 CFR 50.49, "Environmental Qualification of Electric Equipment Important to Safety for Nuclear Power Plants." The NRC also requests that Westinghouse provide a response to four questions. The four NRC questions and Westinghouse responses are attached.

Very truly yours,

A handwritten signature in cursive script, appearing to read "J. A. Gresham".

J. A. Gresham, Manager
Regulatory Compliance and Plant Licensing

Attachment

cc: J. Thompson
Chief, Quality and Vendor Branch B, Division of Engineering, Office of Nuclear Reactor Regulation

IE09

Response to NRC Nonconformance 99901043/2006-201-1

The NRC questions in regard to the nonconformance are duplicated below. The Westinghouse response is provided below each question.

(1) the reason for the nonconformance, or if contested, the basis for disputing the nonconformance:

Westinghouse qualified the Barton Model 763, 763A and 764 series transmitters for safety related harsh environment applications in accordance with the methodology of Westinghouse WCAP-8687. As part of this qualification methodology a baseline design control process was implemented by Westinghouse. In accordance with this process all design changes to these model transmitters were submitted to Westinghouse engineering for review and approval. Each design change was evaluated by Westinghouse for potential impact on both a functional operation and qualification basis. In accordance with this process Westinghouse did review and approve the 1982 design change that instructed the removal of embedded heat shrink from the field side of the transmitter signal lead wire connector assembly. Documentation of the specific review that supports Westinghouse approval of this design change can not be located. Westinghouse has produced evidence that other transmitter design change reviews occurring prior to, and subsequent to, 1982 were adequately documented and said documentation is retrievable.

(2) the corrective steps that have been taken and the results achieved:

Upon detection of this nonconformance, shipments of Model 763, 763A and 764 series transmitters from PRIME (formerly Barton) with the subject signal lead wire connector assembly installed as well as spare signal lead wire connector assemblies, were halted immediately. In 1994 Westinghouse and Barton jointly implemented a procedure that imposed more stringent control on the baseline design change review process. This procedure was formally approved by Westinghouse. Baseline design control remains in accordance with this procedure.

(3) the corrective steps that will be taken to avoid further noncompliances:

In 1994 Westinghouse and Barton issued a procedure that imposed more stringent control on the baseline design change review process. This procedure was formally approved by Westinghouse. Baseline design control remains in accordance with this procedure.

(4) the dates your corrective action will be completed:

Corrective action was implemented in 1994 with the issuance of a more stringent baseline design control procedure. Compliance to this procedure remains in effect.