



NUCLEAR PRODUCTS OPERATIONS

February 25, 2008

Vernon Nuclear Pump Operations, Vernon, Ca 90058
Charlotte Nuclear Service Center, Charlotte, NC 28269

Mr. John Nakoski, Chief
Quality and Vendor Branch 2
Division of Construction Inspection and Operational Programs, Office of New Reactors

Reference: NRC Inspection Report 99901369 / 2007- 201 and Notice of Violation

Subject: Reply to Notice of Violation


Violation # 99901369 / 2007 - 201 - 01: Flowserve failed to notify the NRC of the existence of a defect identified through evaluation # CFR - 06 - 001.

- 1A. Flowserve Reply to Violation: This violation has been determined to be a due to a lack of fully understanding the notification requirements for reporting defects when the defects had been found subsequent to delivery.
- 1B. Corrective measures were established at the onset of disclosure of the violation. Those measures included immediate assessment of past practices, a review of the "newly created" procedure, and a conference was held with all key personnel to identify the violation.
- 1C. Level II Procedure NPO-NNP-01, Procedure for Reporting of Non-Compliances and Defects, is being revised to communicate and direct processes, methods and requirements for reporting defects prior to and post delivery.
- 1D. Procedure NPO-NNP-01 is in-process of revision and, upon completion, shall be used as the tool for training. This procedure will replace all prior procedures concerned with the reporting of defects and non-compliances. It shall be displayed with the posting of 10CFR21. This activity shall be completed by March 21, 2008.

Violation # 99901369 / 2007 - 201 - 02: Procedure NPO-NNP-01 did not provide adequate guidance to meet the requirements of Part 21.

- 2A. Flowserve Reply to the Violation: Procedure NPO-NNP-01 had been a newly created document intended to provide direction to personnel in the requirements and parameters concerning the reporting of non-compliances and defects. The procedure itself fell short of expectations as it was found to be incomplete and contained timeline inaccuracies. Accordingly, it is the reason for this violation. Where the procedure should have been focused on details published through 10CFR21, its focus was rather directed at identifying the appropriate Quality Representatives by name and contact number.
- 2B. The measures to rectify the condition are focused on the review and revision of the procedure.
- 2C. The procedure review and revision shall include prior and post delivery reporting responsibilities, and shall also include definitions to assist in differentiating those responsibilities. This action shall remedy this violation and, through appropriate training, act as the long-term solution.
- 2D. Procedure NPO-NNP-01 is in-process of revision and, upon completion, shall be used as the tool for training. This procedure will replace all prior procedures concerned with the reporting of defects and non-compliances. It shall be displayed with the posting of 10CFR21. This activity shall be completed by March 21, 2008.

Thank you,


David P. Gobbi,
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*Add: John Nakoski
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