

EDO Principal Correspondence Control

FROM: DUE: 12/08/08

EDO CONTROL: G20080777
DOC DT: 11/05/08
FINAL REPLY:

Megan E. Biro
Uber Precision Manufacturing, Inc.

TO:

Chairman Klein

FOR SIGNATURE OF :

** GRN **

CRC NO: 08-0588

Johnson, NRO

DESC:

ROUTING:

Certification or Accreditation and License to
Become a Qualified Vendor for the Nuclear Industry
(EDATS: SECY-2008-0641)

Borchardt
Virgilio
Mallett
Ash
Ordaz
Cyr/Burns
Cyr, OGC
Ferdas, OEDO

DATE: 11/14/08

ASSIGNED TO:

CONTACT:

NRO

Johnson

SPECIAL INSTRUCTIONS OR REMARKS:

EDATS

Electronic Document and Action Tracking System

EDATS Number: SECY-2008-0641

Source: SECY

General Information

Assigned To: NRO

OEDO Due Date: 12/8/2008 5:00 PM

Other Assignees:

SECY Due Date: NONE

Subject: Certifications or Accreditations and License to Become a Qualified Vendor for the Nuclear Industry

Description:

CC Routing: NONE

ADAMS Accession Numbers - Incoming: NONE

Response/Package: NONE

Other Information

Cross Reference Number: G20080777, LTR-08-0588

Staff Initiated: NO

Related Task:

Recurring Item: NO

File Routing: EDATS

Agency Lesson Learned: NO

Roadmap Item: NO

Process Information

Action Type: Letter

Priority: Medium

Signature Level: NRO

Sensitivity: None

Urgency: NO

OEDO Concurrence: NO

OCM Concurrence: NO

OCA Concurrence: NO

Special Instructions:

Document Information

Originator Name: Megan E. Biro

Date of Incoming: 11/5/2008

Originating Organization: Uber Precision Manufacturing, Inc.

Document Received by SECY Date: 11/14/2008

Addressee: Chairman Klein

Date Response Requested by Originator: NONE

Incoming Task Received: Letter

OFFICE OF THE SECRETARY
CORRESPONDENCE CONTROL TICKET

Date Printed: Nov 14, 2008 11:33

PAPER NUMBER: LTR-08-0588 **LOGGING DATE:** 11/13/2008
ACTION OFFICE: EDO

AUTHOR: Megan Biro
AFFILIATION: VA
ADDRESSEE: Dale Klein
SUBJECT: Concerns required certifications or accreditations and license ^{to} ~~be~~ become a qualified vendor for the nuclear industry

ACTION: Direct Reply
DISTRIBUTION: Chairman, Comrs, SECY to Ack

LETTER DATE: 11/05/2008
ACKNOWLEDGED: No
SPECIAL HANDLING: Made publicly available in ADAMS via SECY/EDO/DPC

NOTES:
FILE LOCATION: ADAMS
DATE DUE: 12/08/2008 **DATE SIGNED:**

EDO --G20080777



3720 Cohen Place, Lynchburg, VA 24501
Phone: 434-455-5946 • Fax: 434-455-5947

November 5, 2008

Über Precision Manufacturing, Inc. is a U.S. owned small business manufacturer capable of domestic supply of precision components. Our advanced manufacturing system incorporates quality and security controls with advanced technology to produce highly accurate, repeatable tubing and other components in a clean production environment.

We are aware that there is an issue with domestic supply of components in regard to the production of new nuclear power plants. Über Precision Manufacturing utilizes a highly customized piece of equipment capable of producing the tubing components for piping applications. Our advanced approach allows us to produce high precision components.

We believe our manufacturing system is capable of repeatable production of precision components in accordance with regulatory code and requirements. We want to contribute to the modernization of components manufacturing while also participating in the production of components for the U.S. nuclear plants.

We formally propose the following to the United States Nuclear Regulatory Commission (NRC)

Über proposes to be a subject of an experiment to challenge a new small business to meet the strict requirements of the U.S. Nuclear Regulatory Commission. We seek to obtain the required certifications or accreditations, and license, from the NRC to become a qualified vendor for the US nuclear industry.

The goal of this experiment is to challenge Über to meet all necessary requirements for code and regulation. Über will pursue certification of its manufacturing system and processes by regulatory officials. Once our chosen experiment participant, Areva, accepts the produced component samples, they will be sent off to three separate laboratories for measurements to certify that they were produced within required tolerances at laboratories. Should all these above conditions be met, the experiment will be considered a success.

Upon the successful execution of the experiment, Über will receive the required certification for our manufacturing system.

The Scope

We are confident in our abilities and are willing to submit to a rigorous time schedule. Our goal is to exceed requirements whenever possible. We request NRC guidance in defining the experiment

deliverables that will allow us to achieve certifications and licenses. Assistance navigating NRC regulations and requirements specifically associated with component suppliers that directly relate to safety design will also be needed.

We would like to invite Areva to participate in a challenge with Über Precision Manufacturing, Inc. and NRC officials to provide oversight through the entire process. This experiment will prove Über's ability to meet the strict manufacturing requirements required to qualify as component supplier for the building of new nuclear plants.

- We will produce three samples, each of a selected component for piping applications, for example, parts from a tube schedule.
- Areva will supply us with all Quality Assurance Plan documents required for the fabrication of this product.
- Areva will provide complete technical packages and full clarification of the ASME code requirements, manufacturing requirements, technical requirements, quality assurance requirements, any applicable documents or additional special requirements such as thermal treatments, etc. We request access to their technical representatives as needed for any additional clarification.
- Areva will provide all technical documents in relation to the production of the tubing components, specifically technical drawings with detailed specifications and tolerance/machine notes.
- Areva will provide Über the required material since they have established suppliers. Areva will supply all required material specifics to plan production.
- A pre-planned chain of custody must be defined and agreed upon.
- On-sight observations and official documentation by DOE, NRC, and any other relevant government agencies/officials necessary to ensure that Über follows its defined processes.
- We request third party verification at the following laboratories with Über representatives in attendance: Los Alamos, Lawrence Livermore, and Sandia.

Funding

- We request the NRC provide funding for this experiment. We ask to limit the certification to our current production capabilities. For the limited production quantity proposed, costs for custom tooling fabrication should not exceed \$25,000.00.
- Additional requirements will be on a cost plus basis. If Areva's requirements entail processes for which we do not currently have the capability, for example we do not possess thermal treatment, we will need additional funding.
- Material costs are unknown and will be determined by final agreement to plan execution.

Benefits to the Nuclear Regulatory Commission

The NRC can leverage the results of this experiment to further fund Über's efforts to develop and implement a standard manufacturing system for nuclear vendors and suppliers. Our information architecture incorporates quality controls into all processes from material acceptance to produced component. Once fully developed, our system guarantees continued quality control post shipment through tracking of raw stock to produced components, including scrap material. This integrated solution will address the need for domestic supply sources, including issues of quality, safety and security.

A standardized manufacturing system will provide the NRC with a scalable ability to perform regulation and oversight. When provided with a clear definition of best practices, expectations, and processes, current and future suppliers will be able to meet the NRC's standards. Inspectors can effectively monitor and verify compliance when all suppliers follow the same processes. Any variations of standard operations will be transparent to NRC officials. Once successful implementation is deployed domestically, this system can be easily extended to foreign suppliers.

The lack of a current, domestic supplier base for nuclear components is often attributed to our small businesses' unwillingness to participate in high tech, precision manufacturing. Perhaps, the problem is actually a lack of insight about an industry that has been limited to a few, highly specialized large companies for thirty years. Domestic supply chain participation will increase once the knowledge, tools and processes necessary to navigate this new industry become available. Small businesses will have a roadmap of standard requirements and system implementation. Our integrated manufacturing solution will allow all companies to compete in the nuclear component industry.

New or existing small manufacturing businesses would benefit from implementing standard manufacturing systems. This approach will enable small manufacturing businesses to meet the manufacturing and quality requirements required for new reactor licensees. The NRC can further leverage the requirement for the manufacturing system with the creation of an independent license and certification program for small businesses. The program can be implemented as a three step process that begins with making information and regional resources available to assist small businesses to meet the requirement to implement a standard manufacturing system, followed by certifications and application for license.

Über Precision Manufacturing, Inc. would like to serve the Nuclear Regulatory Commission in any capacity necessary to meet its goals. I look forward to hearing from you in the near future to discuss the details of the proposed experiment, as well as any small business programs that we may qualify for. I can be contacted through the company information above, through email at mbero@upm3d.com, or on my cell phone at 434-609-4406.

Sincerely,



Megan E. Biro
President and CEO
Über Precision Manufacturing, Inc.