



Westinghouse Electric Company  
Nuclear Power Plants  
P.O. Box 355  
Pittsburgh, Pennsylvania 15230-0355  
USA

Juan Peralta, Chief  
Quality and Vendor Branch 1  
Division of Construction Inspection and  
Operational Programs  
Office of New Reactors  
T-7 F3  
Washington, DC 20555-0001  
Email: [Juan.Peralta@nrc.gov](mailto:Juan.Peralta@nrc.gov)

Direct tel: 412-374-6206  
Direct fax: 412-374-5005  
e-mail: [sisk1rb@westinghouse.com](mailto:sisk1rb@westinghouse.com)

Your ref: Docket No. 52-006  
Our ref: DCP/NRC2371  
QLA/NRC0001

February 3, 2009

Subject: WEC Response to NRC Inspection Report No. 05200006/2008-201, Notice of  
Nonconformance

Attached is the Westinghouse response to the NRC Inspection Report No. 05200006/2008-201, Notice of  
Nonconformance

We trust you will find this information satisfactory. Should you have any questions please call me at  
412-374-6206 or email at [sisk1rb@westinghouse.com](mailto:sisk1rb@westinghouse.com).

Very truly yours,

A handwritten signature in black ink, appearing to read 'Robert B. Sisk'.

Robert B. Sisk, Manager  
Licensing and Customer Interface  
Regulatory Affairs and Standardization

cc: Milton Concepcion, NRO/DCIP/CQVP  
Kerri Kavanagh, NRO/DCIP/CQVP  
Greg S. Galletti, NRO/DCIP/CQVP  
Mark P. Kachmar - Westinghouse  
Dee M. Xenakis - Westinghouse

## Corrective Actions to identified Non-conformances

1. Nonconformance 05200006/2008-201-01: The NRC inspectors noted that Westinghouse had not followed Procedure AP-3.2 as required for control of the AP1000 design control document (DCD) and associated design specifications. Specifically, the NRC inspectors identified (1) multiple instances where changes were made to the design specifications or the DCD without proper documentation (i.e., DCPs), (2) several instances where approved DCP were not incorporated into the DCD, and (3) specific material and inspection requirements for the reactor coolant pump (RCP) flywheel assembly described in Sections 5.4.1.2.1 and 5.4.1.3.6.3 of the AP1000 DCD that were not captured in the applicable sections of the RCP certified design specification, APP-MP01-M2-001, Revision 1.

### WEC Corrective Action Response:

Apparent Cause Analyses were completed to address the Nonconformance 05200006/2008-201-01. It was determined that there was a discrepancy with DCPs issued prior to Revision 16 of the DCD and the Current Revision 17. A review of every DCP against AP1000 was completed with a comparison to Rev 16 and Rev 17 of the DCD to determine if the DCPs were incorporated. Any discrepancy was investigated to see the extent of the disagreement between the DCP and the DCD. A CAPs Issue Report (IR) was generated to document and track the correction in the next revision of the DCD.

Westinghouse (WEC) Engineering Management will evaluate the need for additional tools/processes to ensure consistency between design documents and licensing documents. A formal method will be evaluated (i.e., database, procedure, etc.) to verify that the commitments in the DCD are supported by the associated Engineering design documents. Target date for completing the evaluation of this formal method is April 15, 2009.

### Procedure Changes:

The NSNP 3.4.1 (previously AP 3.2) Change Control for the AP1000 Program is being modified to further clarify the DCP procedure changes and to ensure all approved DCPs are properly tracked. The NSNP 3.4.1 procedure change will be effective with New Inter-Business Unit Edition Policies & Procedures, APP-GWGAP-100, R. 21, due 2/27/09.

A new procedure, WEC 3.5.8, Rev 0, 11/3/2008, Design Specifications was developed and implemented to require the Use the Design Criteria Documents Checklist, (Form F-3.5.8-3) for all AP1000 work scope. The form requires the formal review of each Design Specifications for impact on the DCD.

2. Nonconformance 05200006/2008-201-02: The NRC inspectors identified that, for the audits and surveillances selected as a sample, Westinghouse did not, in all instances, document objective evidence to support the results and conclusions associated with supplier oversight audits performed by Westinghouse to control and maintain the Westinghouse QSL.

### WEC Corrective Action Response:

Specific directions have been incorporated into each standard WEC Supplier Audit Checklist requiring documented detailed objective evidence as follows: "Include objective evidence to demonstrate actual assessment of implementation of the evaluated activity or the completeness or accuracy of the procedures governing such activities." Lead Auditor peer review with formal sign off of all Supplier Audit documentation has been instituted to ensure effective implementation.

The Westinghouse Supplier Audit Training Module has been enhanced to increase focus on adequate and acceptable objective evidence. Training will be completed by 6/1/09.

3. Nonconformance 05200006/2008-201-03: WEC 21.0 did not contain adequate procedural guidance for the identification of deviations and failures to comply that must be evaluated to identify a defect or failure to comply that could create a substantial safety hazard. Westinghouse implements an internal process outside of the controls of WEC 21.0 that provides for the assessment and evaluation of conditions adverse to safety to determine whether or not they constitute deviations or failures to comply.

WEC Corrective Action Response:

Westinghouse uses RLE-4-B, "Potential Deviation or Failure to Comply (PD) Process," to assess if a potential condition adverse to safety is a deviation or failure to comply, and RLE-4-C, "Potential Issue (PI) Procedure," to evaluate deviations and failures to comply in accordance with 10 CFR Part 21. RLE-4-B corresponds most directly to the Discovery phase while RLE-4-C corresponds to the Evaluation phase.

The RLE processes will be updated and formalized as a procedure rather than guidance. To satisfy this commitment, the internal RLE process that is followed will be documented in a formal procedure which specifically provides that issues are addressed on a schedule commensurate with their potential safety significance. Westinghouse will revise the definitions and instructions to more clearly describe the discovery and evaluation phases of addressing deviations and failures to comply and will address timeliness for the discovery phase. This QMS Level 3 procedure will include a direct link to QMS Level 2 procedure WEC 21.0, the procedure which governs the Westinghouse implementation of 10CFR21 reporting obligations. The completion of this commitment is scheduled for April 30, 2009.

Westinghouse Procedure/Policy WEC 6.3, "Supplier Qualification and Evaluation Procedure," Revision 10, dated February 29, 2008, contained a procedural step which allowed for alternate methods for maintaining the qualified supplier list (QSL) by individual organizations within Westinghouse without establishing clear criteria for when such alternate methods were acceptable. Also, WEC 6.3 contained an obsolete procedural step, Step 7.12.3, which allowed for the use of a corrective action issues system other than the corrective action process (CAP) database, although all Westinghouse locations have implemented the CAP database and are expected to use the system for collection of issues.

WEC Corrective Action Response:

The procedural step will be deleted that allowed for alternate methods for maintaining the qualified supplier list (QSL) by individual organizations within Westinghouse. The change will be effective with New Inter-Business Unit Edition Policies & Procedures, APP-GWGAP-100, R. 21, due 2/27/09.

The obsolete procedural step, Step 7.12.3, which allowed for the use of a corrective action issues system other than the corrective action process (CAP) database, will be replaced with the following: "7.12.4 Supplier audit findings are documented via WEC 16.2." and "8.13.5 Description of each reported finding in sufficient detail to enable corrective action to be taken by the supplier. Include a CAPs Supplier Corrective Action Request Form with the audit report. (See Forms F-7.1-4, Appendix B and Section 7.12.3)". The change will be effective with New Inter-Business Unit Edition Policies & Procedures, APP-GWGAP-100, R. 21, due 2/27/09.

## Corrective Action Details Report

### **1. Nonconformance 05200006/2008-201-01**

- 1.1. The NRC inspectors noted that Westinghouse had not followed Procedure AP-3.2 as required for control of the AP1000 design control document (DCD) and associated design specifications. Specifically, the NRC inspectors identified (1) multiple instances where changes were made to the design specifications or the DCD without proper documentation (i.e., DCPs),

Magnetic Particle Examination Spec: The NRC inspectors noted that Section 5.3.2.3.3, "Magnetic Particle Examination," of the AP1000 DCD, Revision 17, limits the examination techniques before the final post weld heat treatment of the RPV to the prod, coil, or direct contact method. Upon reviewing APP-MV01-Z0-101, the NRC inspectors found that Section 8.3.3 allows for the prod coil (direct contact method) or the yoke method to be used before the final post-weld heat treatment. The addition of the yoke method occurred in Revision 2 of the design specification. This change to the design specifications is less conservative than the method specified in the DCD. At the time of the exit meeting, Westinghouse released Issue Report (IR) 08-304-M027 to address this condition.

#### WEC Corrective Action Response:

An Apparent Cause Analysis was completed (reference WEC CAPs (IR) 08-304-M027).

A new procedure, WEC 3.5.8, Rev 0, 11/3/2008, Design Specifications was developed and implemented to require the Use the Design Criteria Documents Checklist, (Form F-3.5.8-3) for all AP1000 work scope. The form requires the formal review of each Design Specifications for impact on the DCD.

Engineering will issue a DCP to resolve the difference between the Magnetic Particle Examination Design specification and DCD commitments for materials and inspection requirements. Target date for completion is February 27, 2009.

Module Bolt Spec: The NRC inspectors observed that Table 3.8.4-6 of the AP1000 DCD lists American Society for Testing and Materials (ASTM) A325 bolts, whereas the "Nuclear Island Structural Modules Specification" (APP-GW-Z0-100) specifies A325 or A490 bolts. At the time of the exit meeting, Westinghouse issued IR 08-304-M032 to address this condition.

#### WEC Corrective Action Response:

Engineering will issue a DCP to resolve the difference between Table 3.8.4-6 of the AP1000 DCD referencing ASTM A325 bolts, and the "Nuclear Island Structural Modules Specification" (APP-GW-Z0-100). Target date for completion is February 27, 2009

Concrete Spec: The NRC inspectors found that Section 3.8.4.6.1.1, "Concrete," of the AP1000 DCD specifies that 4,000 or 6,000 pound-per-square-inch (psi) concrete be cured at either 28 (no retardant) or 56 days (with retardant). However, the Civil Structural Design Criteria APP-GW-C1-001 specifies only that 4,000 psi concrete be cured at either 28 or 90 days. At the time of the exit meeting, Westinghouse issued IR 08-304-M033 to address this condition.

#### WEC Corrective Action Response:

Engineering will issue a DCP to resolve the difference between Section 3.8.4.6.1.1, "Concrete," of the AP1000 DCD and the Civil Structural Design Criteria APP-GW-C1-001. Target date for completion is February 27, 2009.

Steam Generator Spec: The NRC inspectors noted that Section 5.4.2.4.1, "Selection and Fabrication of Materials," of the AP1000 DCD, Tier 2, Revision 17 (as well as Revision 16) specifies the cladding material for the steam generator tube sheet to be SFA-5.14 (nickel-chromium-iron alloy). However, Table 7.1-1 of the "Steam Generator Certified Design Specification," APP-MB01-Z0-101, Revision 1, lists not only SFA-5.14 but also the option to use SFA-5.11. At the time of the exit meeting, Westinghouse issued IR 08-303-M013 to address this condition.

WEC Corrective Action Response:

An Apparent Cause Analysis was performed by Westinghouse (IR#08-303-M013)

Engineering will issue a DCP to resolve the difference between Section 5.4.2.4.1 of Rev. 17 of the DCD and Table 7.1-1 of Rev. 1 the AP1000 Steam Generator Design Spec. Target date for completion is February 20, 2009

The Engineering component design leads will re-review the DCD Table 5.2-1 for consistency with current design of all the components listed in the table and cross-checked for consistency with the applicable component section of the DCD. Target date for completion is Feb 25, 2009.

Westinghouse (WEC) Engineering Management will evaluate the need for and value of additional tools/processes to ensure consistency between design documents and licensing documents. A formal method will be evaluated (i.e., database, procedure, etc.) to verify that the commitments in the DCD are supported by the associated Engineering design documents. Target date for completing the evaluation of this formal method is April 15, 2009.

Procedure Changes:

The NSNP 3.4.1 (previously AP 3.2) Change Control for the AP1000 Program is being modified to further clarify the DCP procedure changes and to ensure all approved DCPs with a potential impact on the certified design are properly tracked and implemented.

The NSNP 3.4.1 procedure change will be effective with New Inter-Business Unit Edition Policies & Procedures, APP-GWGAP-100, R. 21, due 2/27/09.

WEC 3.5.8, Rev 0, 11/3/2008, Design Specifications was developed and implemented to require the Use the Design Criteria Documents Checklist, (Form F-3.5.8-3) for the AP1000 work scope. The form requires the formal review of each Design Specifications for impact on the DCD.

1.2. Several instances where approved DCP were not incorporated into the DCD

The NRC inspectors identified two instances where approved DCPs were not incorporated into the AP1000 DCD in accordance with procedure AP-3.2. Westinghouse identified four additional instances where approved DCPs were not fully incorporated into the DCD. At the time of the exit meeting, Westinghouse issued IR 08-304-M035 to address this condition.

WEC Corrective Action Response:

An Apparent Cause Analysis (08-318-M021) was performed by Westinghouse that included a review of all DCPs generated for the AP1000 design.

A review of the approved DCPs against AP1000 was completed with a comparison to Rev 16 and Rev 17 of the DCD to determine if the DCPs were properly incorporated. Any discrepancy was investigated to see the extent of the disagreement between the DCP and the DCD. A CAPs Issue Report (IR) was generated to document and track the correction in the next revision of the DCD.

A total of 372 DCPs were reviewed and the results summarized as follows:

3 DCPs identified that impact the DCD and were issued after DCD Rev 17. These are being tracked and at the appropriate time will be incorporated to the DCD.

**7 DCPs were identified that impact the DCD and need to be included in the next DCD revision:**

DCP 220 – IR#08-304-M035 & IR#08-340-M011  
DCP 103 – IR#08-340-M011  
DCP 111 – IR#08-340-M011  
DCP 116 – IR #08-340-M011  
DCP 198 – R# 08-261-M010  
DCP 244 – IR# 08-331-M004  
DCP 405 – IR#09-014-M004

In summary, the DCPs identified during the analyses will be incorporated into the conforming DCD revision that will be generated to include any NRC items identified.

Procedure Change:

The NSNP 3.4.1 (previously AP 3.2) Change Control for the AP1000 Program is being modified to further clarify the DCP procedure changes and to ensure all approved DCPS are track and properly addressed. The DCD Revision procedure change will be effective with New Inter-Business Unit Edition Policies & Procedures, APP-GWGAP-100, R. 21, due 2/27/09.

DCD Change Control Board:

The Westinghouse Licensing Management has added a Licensing representative to the Change Control Board (CCB) responsible for the systematic evaluation, coordination, and approval or disapproval of all proposed configuration changes to the DCD.

- 1.3. (3) specific material and inspection requirements for the reactor coolant pump (RCP) flywheel assembly described in Sections 5.4.1.2.1 and 5.4.1.3.6.3 of the AP1000 DCD that were not captured in the applicable sections of the RCP certified design specification, APP-MP01-M2-001, Revision 1.

The NRC inspectors found that Sections 5.4.1.2.1, "Design Description," and 5.4.1.3.6.3, "Flywheel Integrity," of the AP1000 DCD, Tier 2, were revised under Revision 17 and incorporated additional information regarding the RCP flywheel assembly material and inspection requirements provided by Westinghouse in response to an NRC request for additional information (RAI-SRP5.4.1-CIB1-01). Contrary to the requirements of Procedure AP-3.2, the AP1000 DCD was revised without issuance of a DCP.

In addition, the NRC inspectors found that Sections 5.4.1.2.1 and 5.4.1.3.6.3 of the AP1000 DCD, Revision 17, discuss specific material and inspection requirements for the RCP flywheel assembly that are not captured in the applicable sections of the "RCP Certified Design Specification," APP-MP01-M2-001, Revision 1. Specifically, Sections 5.4.1.2.1 and 5.4.1.3.6.3 state the following:

- The RCP flywheel assemblies are fabricated from a tungsten heavy alloy, Type 403 stainless steel, and 18Ni maraging steel.
- The segments are held into place by an interference fit retainer cylinder of 18Ni maraging steel placed over the outside of the assembly.
- The assembly is hermetically sealed from primary coolant by endplates and an outer thin shell of Alloy 625.
- Ni/Fe/Cr Alloy 600 is not used for this application. Furthermore, Section 5.4.1.3.6.3 specifies the following testing requirements:

- ✓ The Type 403 stainless steel inner hub material will be subject to impact testing using three Charpy V-notch tests per ASTM A370, magnetic particle examination per ASTM A788 Supplemental Requirement S18, and ultrasonic examination per ASTM A788 Supplemental Requirement S20, Acceptance Levels BR and S.
- ✓ The retainer ring will be subject to fracture toughness testing per ASTM E399, magnetic particle examination per ASTM A788 Supplemental Requirement S18, and ultrasonic examination per ASTM A788 Supplemental Requirement S20, Acceptance Levels BR and S.

The "RCP Certified Design Specification," Sections 3.2.4.2 and 7.5.1.5, discuss the RCP flywheel integrity and inspection requirements, respectively, but does not list the specific requirements discussed in the DCD above

WEC Corrective Action Response:

An Apparent Cause Analysis (09-014-M025) was performed by Westinghouse that included a thorough review of RCP Design Specification. AP1000 RCP DSpec Rev 0 was issued 6/14/2007 which showed compliance to Reg Guide 1.14 and was consistent with DCD Rev. 16. The NRC Submitted RAI-SRP5.4.1-CIB1-01, 3/12/2008 that requested specific design details be incorporated into the flywheel materials and inspections in the DCD. WEC provided the requested detailed information based on the current state of the design to the RAI on 4/11/2008.

The RCP Flywheel design specification was being further development by WEC Engineering. The AP1000 RCP DSpec Rev 1, 7/18/2008 was issued with minor changes and excluded the very specific detailed flywheel materials and inspections requested by the RAI since the design was still being finalized.

The DCD Rev. 17 was issued 9/22/2008 with Section 5.4.1.3.6.3 changed to add the specific flywheel materials and inspections as provided in the RAI response. Appendix 1A was not modified. Now Rev. 1 of the RCP DSpec was inconsistent with the DCD, and did not contain the detailed requirements that are listed in Section 5.4.1.3.6.3 of the DCD.

Engineering will issue a class 1 DCP to change the specific materials based on the results of prototype mockup testing, and the design specification will be revised to include the inspection requirements in the DCD. This may require proposing modifications to both the DCD Sections 5.4.1.2.1 and 5.4.1.3.6.3 and the RCP Design Specification Sections 3.2.4.2 and 7.5.1.5.

Procedure Change:

The NSNP 3.4.1 (previously AP 3.2) Change Control for the AP1000 Program is being modified to further clarify the DCP procedure changes and to ensure all approved DCPs are tracked. The NSNP 3.4.1 procedure change will be effective with New Inter-Business Unit Edition Policies & Procedures, APP-GWGAP-100, R. 21, due 2/27/09.

WEC 3.5.8, Rev 0, 11/3/2008, Design Specifications was developed and implemented to require the Use the Design Criteria Documents Checklist, (Form F-3.5.8-3) for the AP1000 work scope. The form requires the formal review of each Design Specifications for impact on the DCD.

**2. Nonconformance 05200006/ 2008-201-02:**

The NRC inspectors identified that, for the audits and surveillances selected as a sample, Westinghouse did not, in all instances, document objective evidence to support the results and conclusions associated with supplier oversight audits performed by Westinghouse to control and maintain the Westinghouse QSL.

In several instances the only evidence supporting an assessment of a QA criterion was reference to a specific procedure, test report, job number or heat number, or specific item that was tested or

inspected. The NRC inspectors did not observe any additional supporting documentation regarding the actual assessment of implementation of the evaluated activity or the completeness or accuracy of the procedures governing such activities.

WEC Corrective Action Response:

Corrective action for this issue was under development and partially implemented at the time of the NRC Inspection. These actions are:

- Include specific direction in each standard WEC supplier audit checklist section on the expectation for documented thoroughly (detailed) objective evidence
  - a. This was implemented 6/30/08 as a reminder to specify implementing procedures and revisions in the objective evidence.
  - b. That standard WEC supplier audit checklist has been enhanced to read as follows: "Include objective evidence to demonstrate your actual assessment of implementation of the evaluated activity or the completeness or accuracy of the procedures governing such activities."
  - c. This corrective action was completed 1/14/09.
- Institute Lead Auditor peer review with formal sign off of all audit documentation.
  - a. This was instituted 9/30/08.
  - b. This corrective action was completed 9/30/08.
- Increase focus in periodic supplier audit expectations training module on adequate and acceptable objective evidence.
  - a. The topic of objective evidence has been a part of existing training material.
  - b. Training material has been revised to include specific emphasis per 1.b above.
  - c. The first training session to implement this will be held 1/23/09.
  - d. This corrective action (remaining training sessions) will be completed 6/1/09.

**3. Nonconformance 05200006/2008-201-03**

- 3.1. WEC 21.0 did not contain adequate procedural guidance for the identification of deviations and failures to comply that must be evaluated to identify a defect or failure to comply that could create a substantial safety hazard. Westinghouse implements an internal process outside of the controls of WEC 21.0 that provides for the assessment and evaluation of conditions adverse to safety to determine whether or not they constitute deviations or failures to comply.

WEC Corrective Action Response:

WEC 21.0 covers company wide organizational responsibilities and activities involved in addressing 10CFR21 (and other related regulations) and define deviations and failures to comply. WEC 21.0 was written to be a Company level procedure to inform all employees about Westinghouse policy regarding reporting of potential safety concerns and their individual responsibilities for making such concerns known to appropriate members of the Westinghouse management team.

Once identified, the Regulatory Compliance and Plant Licensing (RCPL) Group has the responsibility, in concert with the Westinghouse Safety Review Committee (WSRC), for determining whether or not a specific safety concern meets the threshold for reporting to the NRC as set forth in 10CFR21. In executing this responsibility, the RCPL staff uses processes set down in the RLE Administrative Manual. As noted by the NRC in the Inspection report, Westinghouse uses RLE-4-B, "Potential Deviation or Failure to Comply (PD) Process," to assess if a potential condition adverse to safety is a deviation or failure to comply, and RLE-4-C, "Potential Issue (PI) Procedure," to evaluate deviations and failures to comply in accordance with 10 CFR Part 21. RLE-4-B corresponds most directly to the Discovery phase while RLE-4-C corresponds to the Evaluation phase.



When first implemented, the entire 10 CFR 21 process was a manual process. Currently, initial identification of a potential deviation or failure to comply is largely an automated electronic process administered through the Westinghouse Corrective Action Program system (CAPs). CAPs are controlled through WEC procedure 16.2. This evolution was not adequately reflected in the existing RLE Administrative Manual. Similarly, the linkage between WEC 21.0, WEC 16.2 and the RLE Administrative Manual requires clarification. Westinghouse is reviewing the relationship between these procedures and the Manual and will implement appropriate changes and clarifications.

To satisfy this commitment, the internal RLE process that is followed will be documented in a formal procedure which specifically provides that issues are addressed on a schedule commensurate with their potential safety significance. Westinghouse will revise the definitions and instructions to more clearly describe the discovery and evaluation phases of addressing deviations and failures to comply and will address timeliness for the discovery phase. This QMS Level 3 procedure will include a direct link to QMS Level 2 procedure WEC 21.0, the procedure which governs the Westinghouse implementation of 10CFR21 reporting obligations. The completion of this commitment is scheduled for April 30, 2009.

- 3.2. Westinghouse Procedure/Policy WEC 6.3, "Supplier Qualification and Evaluation Procedure, Revision 10, dated February 29, 2008, contained a procedural step which allowed for alternate methods for maintaining the qualified supplier list (QSL) by individual organizations within Westinghouse without establishing clear criteria for when such alternate methods were acceptable.

WEC Corrective Action Response:

The text from WEC 6.3 was "7.3.4 Alternate methods for maintaining the Qualified Suppliers List may be adopted by individual Quality organizations to suit local practices."

Corrective Action: The above text will be deleted. The change will be effective with New Inter-Business Unit Edition Policies & Procedures, APP-GWGAP-100, R. 21, due 2/27/09.

Note: WEC 7.1, R. 0 in New Inter-Business Unit Edition Policies & Procedures, APP-GWGAP-100, Rev. 20 replaced WEC 6.3 on 11/3/08.

- 3.3. Also, WEC 6.3 contained an obsolete procedural step, Step 7.12.3, which allowed for the use of a corrective action issues system other than the corrective action process (CAP) database, although all Westinghouse locations have implemented the CAP database and are expected to use the system for collection of issues.

WEC Corrective Action Response:

The text from WEC 6.3 was "7.12.3 Supplier audit findings are documented via WEC 14.4. At locations where CAPs is not available, supplier audit findings may be documented via local corrective action systems, providing the local system has content equivalent to Appendix B of this procedure."

Corrective Action: The above text will be replaced with the following: "7.12.4 Supplier audit findings are documented via WEC 16.2." and "8.13.5 Description of each reported finding in sufficient detail to enable corrective action to be taken by the supplier. Include a CAPs Supplier Corrective Action Request Form with the audit report. (See Forms F-7.1-4, Appendix B and Section 7.12.3)". The change will be effective with New Inter-Business Unit Edition Policies & Procedures, APP-GWGAP-100, R. 21, due 2/27/09.

Note: WEC 7.1, R. 0 in New Inter-Business Unit Edition Policies & Procedures, APP-GWGAP-100, R. 20 replaced WEC 6.3 on 11/3/08.

Confirmed By:  
Dee M. Xenakis, Manager Quality NPP Programs  
Westinghouse Electric Company