



Nova Machine Products  
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Middleburg Heights, OH 44130  
Phone: 216.267.3200 • Fax: 216.433.1640  
<http://novamachine.cwfc.com>

June 26, 2009

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555-0001

Subject: Reply to a Notice of Nonconformance, NRC No. 99901052/2009-201

The purpose of this document is to respond to the above referenced Notice of Nonconformance from the NRC Inspection of Nova Machine Products which was performed April 28 thru May 1, 2009.

Attached please find the following documentation for each nonconformance identified during the inspection:

- Reason for the nonconformance
- Corrective action that has been taken
- Corrective action that has been taken to avoid further nonconformances
- Completion date for the corrective action taken
- Objective evidence to support the corrective action taken

If you have any questions, please contact Nova Machine Products at your convenience.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Timothy A. Davis'.

Timothy A. Davis  
General Manager

cc: Anne T. Boland  
Acting Division Director, Division of Engineering  
Office of Nuclear Reactor Regulation

Attachments

TE09  
NRR



June 26, 2009

**NRC Nonconformance 99901052/2009-201-01, Nova CAR #141**

Reason for the Nonconformance

Nova Machine Products evaluation of customer returns for 10CFR21 applicability was based on the assumption that customer would have performed the evaluation for 10CFR21 applicability when he rejected the returned material. Therefore, Nova's evaluation of the returned material was to determine if there were additional customers who would have received the same product and/or if there was additional material still in inventory which required further evaluation.

Corrective Action Taken

- During the NRC inspection, a flow chart for the evaluation of customer returned material was created and reviewed with the NRC Inspectors for their input.
- Nova Nonconforming Material Procedure 8.3 has been revised to include the flow chart for evaluation of customer returned material for 10CFR21 applicability.
- The questions to be answered as part of the evaluation for 10CFR21 applicable on Nova NCR for customer returned material have been revised and the new format has been implemented.
- Nova personnel performing the evaluation of customer returned material have been trained in the new procedural requirements.

Corrective Action to Avoid Non-compliance

Same as above

Completion Date – 6/22/09

A handwritten signature in black ink, appearing to read "David Nenstiel".

David Nenstiel  
QA Manager

Attachments

- Nova Procedure 8.3 Rev.3 dated 6/12/09, Flow Chart for evaluation of customer returns for 10CFR21 applicability
- Revised Nova NCR format for Customer Returns
- Training record





Attachment # 2  
99901052/2009-201-01

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DIVISION OF Curtiss-Wright Flow Control Service Corp.

COMPLAINT # EXT00000495

Page: 1 of 2

**NON-CONFORMING REPORT # EXT00000495**

|  |                     |                        |
|--|---------------------|------------------------|
| <b>Customer:</b><br>Name First Energy Corporation<br>Number 1328<br>Contact<br>Title<br>Phone<br>Fax | <b>Type</b>         | BY NOVA                |
|  | <b>Category</b>     | THREAD/GAGING PROBLEMS |
|  | <b>Received</b>     | 23-JAN-09              |
|  | <b>SO #</b>         | 130805                 |
|  | <b>Cust PO #</b>    | 45259432               |
|  | <b>Cust CAR #</b>   |                        |
|  | <b>Sales Person</b> | Hoose, Mr. Jonathan    |

**SUMMARY ISSUE DESC:**  
bad threads

**LINES:**

| Line | Item           | Ship Date | Invoiced | Lot # | Cert # | WO # | Qty Shipped | Qty to be Returned | Act Qty Returned | Date Returned |
|------|----------------|-----------|----------|-------|--------|------|-------------|--------------------|------------------|---------------|
| 1.1  | HMSN.000237.30 |           |          |       |        |      |             | 1                  |                  |               |

**CATEGORY:**

ISO/Commercial     Military/Government     Safety Related     ASME Code

**Defects:**

**Error Origin**

**RMA:**

RMA #                      Date Issued                      By

" SAMPLE "

**EXTERNAL NCR'S**

1. Was the material supplied as code or safety related material?  
If No, do not proceed with questions below.  Yes  No
2. Was the material rejected at the customer's incoming inspection?  
If No, refer to procedure 8.3 flowchart for evaluation to 10CFR Part 21  Yes  No
3. Was the material manufactured specifically for the customer?  
If No, refer to procedure 8.3 flowchart for evaluation to 10CFR Part 21.  Yes  No
4. Is this a generic material issue?  
If Yes, refer to procedure 8.3 flowchart for evaluation to 10CFR Part 21.  Yes  No
5. Has any remaining inventory been quarantined?  Yes  No
6. Based on this evaluation , the non-conformance is Reportable Under 10 CFR Part 21:  Yes  No

**DISPOSITION:**

Accept as is     Repair (No Welding of Bolting Materials)     Applicable - ANI Review required for NPT Stamped Materials & Items

Return to Vendor    RTV RMA #                      Vendor Name

- Scrap  
 Rework     Customer Approval Required  
 Other

Page 3 of 13



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Attachment #3
99901052/2009-201-01

Employee Training Record

Date: 6/22/09

Subject: External NCR's - Evaluation for 10CFR 21 Applicability

Instructor: David Nenshil

Time: 1/2 Hour

Table with 3 columns: Attendees Name, Department, Signature/Initials. Rows include Frank Furfari (QC), Sandy Mariotti (QC), Ed Baus (Engineering), and Steve Dvuzak (Engineering).

Outline of Subject

Reviewed new flowchart from Procedure 8.3 & revised wording on Nova External Nonconformance Reports with respect to evaluation of customer returns for 10CFR 21 applicability.

Instructors Signature: David Nenshil

Title: QA Manager



June 26, 2009

**NRC Nonconformance 99901052/2009-201-02, Nova CAR #141**

Reason for the Nonconformance

Nova Machine Products' historical practice of reporting chemical analysis data on the CMTR was to utilize the original manufacturer's certification data in lieu of the actual results from the dedication tests performed by Nova and/or a qualified sub-tier testing laboratory supplier.

Corrective Action Taken

- Immediately after the conclusion of the inspection (Friday May 1, 2009), Nova discontinued the practice of report chemical analysis provided by commercial suppliers and in its place only the dedication test chemical analyses are being reported on the Nova CMTR's.
- A memo was written on 5/1/09 to the Nova Certification Specialists detailing the revised chemical analyses reporting requirements and training was conducted that same day.
- Nova Commercial Grade Dedication Work Instruction 7.3.20 has been revised to include following requirement: "Nova CMTR's (when required) for dedicated items shall list the actual results from the dedication tests performed by Nova and/or an approved subtier supplier. The certification results provided by an unqualified supplier shall not be used in the Nova CMTR."

Corrective Action to Avoid Non-compliance

Same as above

Completion Date – 6/9/09

A handwritten signature in black ink, appearing to read "David Nenstiel". The signature is written in a cursive style with a long horizontal stroke at the end.

David Nenstiel  
QA Manager

Attachments

- Memo from David Nenstiel dated 5/1/09
- Completed training form dated 5/1/09
- Nova Work Instruction 7.3.20 Rev.1 dated 6/9/09, page 8



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Attachment # 1  
99901052/2009-201-02

May 1, 2009

Jennifer DeMarco  
Kalyn Krause  
Patrick Dombrowski

Subject: Nova CMTR's for Dedicated Safety Related Materials

In response to a Nonconformance identified by the NRC during their just completed inspection of Nova, effective immediately, the standard procedure of reporting certification data (e.g., chemical and mechanical test results) from an unqualified supplier on a Nova CMTR is to be discontinued.

For safety related material that is dedicated by Nova, only the test data derived from testing performed by Nova or one of our approved subcontracted testing laboratories is to be reported on the Nova CMTR. There are no exceptions to this requirement.

Please note that this restriction does not apply to certification data which has been supplied by an approved supplier (i.e., a supplier who is on the Nova ASL).

David Nenstiel  
QA Manager



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Attachment #2  
99901052/2009-201-a

### Employee Training Record

Date: 5/1/09

Subject: NRC Inspection Nonconformance  
Dedicated items CMTR

Instructor: David Wenstiel

Time: 1/2 Hour

| Attendees Name     | Department | Signature/Initials  |
|--------------------|------------|---------------------|
| Jennifer DeMarco   | Certs      | Jennifer DeMarco JD |
| Kslyn Krause       | Certs      | Kslyn Krause KK     |
| Patrick Dombrowski | Certs      | Patrick Dombrowski  |
|                    |            |                     |
|                    |            |                     |
|                    |            |                     |
|                    |            |                     |

Outline of Subject  
Discussed NRC Nonconformance for dedicated  
items CMTR. Practice of using test data from  
unqualified/unapproved suppliers is to be discontinued  
effective immediately. Only acceptable test data from  
now dedicated testing is to be used on the CMTR.

Instructors Signature: David Wenstiel

Title: QA Manager

|                                    |        |                  |        |
|------------------------------------|--------|------------------|--------|
| 7.3.20 Commercial Grade Dedication | Rev. 1 | Effective 6-9-09 | Issued |
|------------------------------------|--------|------------------|--------|

### The Dedication Plans

- Generic Product Dedication Plans and format are provided in Attachment A
- Specific Product Dedication Plans and format are provided in Attachment B
- Special Products: Unistrut dedication is discussed in Attachment C

### Certification

- ***Nova CMTR's (when required) for dedicated items shall list the actual results from the dedication tests performed by Nova and/or an approved sub-tier supplier. The certification results provided by an unqualified supplier shall not be used in the Nova CMTR.***

### Records

- Records of the outputs from the CGI process shall be collected, maintained and stored in accordance with the Table on Page 10 of this Work Instruction.

### Method

The Commercial Grade Dedication process at Nova is designed to take a commercial grade item and perform the necessary activities to provide reasonable assurance the item supplied will meet the item specification and perform its intended safety related function. The flow chart that outlines the process is depicted on the next page. Typically Nova enters into the process after a customer has performed the technical evaluation and determined the item specified is safety related and meets the design requirements for the application. Nova divides products into two categories: Generic and Specific. A generic item is defined in this procedure, and may have many different applications; therefore, Nova identifies the critical characteristics as those required by the specification of the item, and obtains assurance the item will meet those requirements and function as designed. The dedication plans are therefore generically developed and proceduralized. Specific items are defined in this procedure as well. Nova treats those items that are not manufactured to industry standards, are complex, moving, and or complete assemblies as Specific Products. These items require an engineering evaluation and follow a more individualized dedication process.

June 26, 2009

**NRC Nonconformance 99901052/2009-201-03, Nova CAR #141**

Reason for the Nonconformance

The audit in question (PMC Lone Star) which was conducted in 2006 was incorrectly classified as an audit when in fact it was a commercial grade survey.

Corrective Action Taken

- A document which identifies critical characteristics for a calibration supplier commercial grade survey has been prepared and approved.
- Based on the above document, the audit in question was reviewed and the results were found to be acceptable to satisfy the identified critical characteristics. Therefore, this audit has been reclassified as a Commercial Grade Survey.
- Training was conducted for the Lead Auditor on the critical characteristics requirements for calibration suppliers.
- Nova's AVL was reviewed for any similar issues for other calibration suppliers. One additional supplier (Multi-Lapping Service) was identified, reviewed, found acceptable as a Commercial Grade Survey and re-classified accordingly.

Corrective Action to Avoid Non-compliance

Same as above

Completion Date – 6/9/09



David Nenstiel  
QA Manager

Attachments

- Calibration Supplier Commercial Grade Survey Critical Characteristics Document
- Commercial Grade Item/Service Summary Forms for PMC Lone Star and Multi-Lapping Service
- Training Form



**Commercial Grade Survey  
Critical Characteristics**

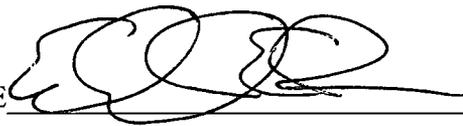
Commodity – Item/Service: Calibration

Revision: 0

Date: May 11, 2009

| Characteristic                          | Basis For Selection  |
|---|--|
| Calibration Procedures                  | <ul style="list-style-type: none"> <li>Supplier must have procedures which are available and utilized for the calibration of M&amp;TE and standards.</li> </ul>  |
| Adequacy of Measurement Standards       | <ul style="list-style-type: none"> <li>Supplier must have primary and/or secondary calibration standards which have the accuracy, stability, range, tolerance and resolution required for the item being calibrated.</li> </ul>                                |
| Environmental Condition                 | <ul style="list-style-type: none"> <li>Supplier must control the environmental conditions to the extent necessary to ensure continued measurement with required accuracy.</li> </ul>   |
| Intervals of Calibration of Standards   | <ul style="list-style-type: none"> <li>Supplier must have a recall system to assure M&amp;TE and standards are calibrated at established intervals and maintained to assure acceptable accuracy and reliability.</li> </ul>                                    |
| Calibration Status                      | <ul style="list-style-type: none"> <li>Supplier must have a system to assure that M&amp;TE and standards are uniquely identified and labeled to indicate calibration status.</li> </ul>  |
| Out of Tolerance & Corrective Action    | <ul style="list-style-type: none"> <li>Supplier must have a system that provides for customer notification when the supplier's M&amp;TE/standards are found to be out-of-tolerance to the extent that customer's calibration status may be invalid.</li> </ul> |
| Calibration Certification Documentation | <ul style="list-style-type: none"> <li>Supplier must have a system to assure that the calibration service is supported by records with a specified record retention period.</li> </ul>   |
| Calibration Traceability                | <ul style="list-style-type: none"> <li>Supplier's M&amp;TE, calibration standards and reference materials are traceable to national, international or intrinsic standards where available.</li> </ul>  |
| Subcontractor Calibration Controls      | <ul style="list-style-type: none"> <li>Supplier must assure that sub-suppliers providing calibration services for their own M&amp;TE and standards are capable of performing the required services with adequate quality.</li> </ul>                           |

PREPARED/DATE  5/11/09

APPROVED/DATE  5/11/09



**COMMERCIAL GRADE ITEM/SERVICE SUMMARY**

SUPPLIER PMC Lone Star

SURVEY DATES: 12/6/06

| CRITICAL CHARACTERISTICS SUMMARY  |                                     |   |       |          |
|---|-------------------------------------|---|-------|----------|
| COMMODITY - ITEM / SERVICE (specify): Calibration   |                                     |   |       |          |
| CC #  | SCOPE CC                            | CRITICAL CHARACTERISTICS (CC) TO BE EVALUATED | S / U | Comments |
| 1   | <input checked="" type="checkbox"/> | Calibration Procedures                        | S     |          |
| 2   | <input checked="" type="checkbox"/> | Adequacy of Measurement Standards             | S     |          |
| 3   | <input checked="" type="checkbox"/> | Environmental Conditions                      | S     |          |
| 4   | <input checked="" type="checkbox"/> | Intervals of Calibration of Standards         | S     |          |
| 5   | <input checked="" type="checkbox"/> | Calibration Status                            | S     |          |
| 6   | <input checked="" type="checkbox"/> | Out-of-Tolerance & Corrective Action          | S     |          |
| 7   | <input checked="" type="checkbox"/> | Calibration Certification Documentation       | S     |          |
| 8   | <input checked="" type="checkbox"/> | Calibration Traceability                      | S     |          |
| 9   | <input checked="" type="checkbox"/> | Subcontractor Calibration Controls            | S     |          |
| 10  | <input type="checkbox"/>            |   |       |          |
| CONCLUSIONS   |                                     |   |       |          |
| Do Commercial Grade Quality Controls adequately control all identified critical characteristics? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> (Explain any No responses) |                                     |   |       |          |
|   |                                     |   |       |          |
|   |                                     |   |       |          |
|   |                                     |   |       |          |
|   |                                     |   |       |          |
|   |                                     |   |       |          |
|   |                                     |   |       |          |
|   |                                     |   |       |          |

Approved By: 

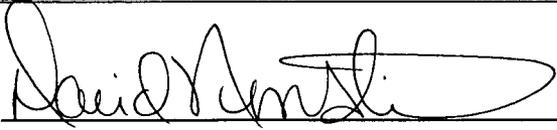
Date: 5/11/09



**COMMERCIAL GRADE ITEM/SERVICE SUMMARY**

SUPPLIER Multi-Lapping Services SURVEY DATES: 5/26/06

| CRITICAL CHARACTERISTICS SUMMARY  |                                     |   |       |          |
|---|-------------------------------------|---|-------|----------|
| COMMODITY - ITEM / SERVICE (specify): Calibration   |                                     |   |       |          |
| CC #  | SCOPE CC                            | CRITICAL CHARACTERISTICS (CC) TO BE EVALUATED | S / U | Comments |
| 1   | <input checked="" type="checkbox"/> | Calibration Procedures                        | S     |          |
| 2   | <input checked="" type="checkbox"/> | Adequacy of Measurement Standards             | S     |          |
| 3   | <input checked="" type="checkbox"/> | Environmental Conditions                      | S     |          |
| 4   | <input checked="" type="checkbox"/> | Intervals of Calibration of Standards         | S     |          |
| 5   | <input checked="" type="checkbox"/> | Calibration Status                            | S     |          |
| 6   | <input checked="" type="checkbox"/> | Out-of-Tolerance & Corrective Action          | S     |          |
| 7   | <input checked="" type="checkbox"/> | Calibration Certification Documentation       | S     |          |
| 8   | <input checked="" type="checkbox"/> | Calibration Traceability                      | S     |          |
| 9   | <input checked="" type="checkbox"/> | Subcontractor Calibration Controls            | S     |          |
| 10  | <input type="checkbox"/>            |   |       |          |
| CONCLUSIONS   |                                     |   |       |          |
| Do Commercial Grade Quality Controls adequately control all identified critical characteristics? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> (Explain any No responses) |                                     |   |       |          |
|   |                                     |   |       |          |
|   |                                     |   |       |          |
|   |                                     |   |       |          |
|   |                                     |   |       |          |
|   |                                     |   |       |          |
|   |                                     |   |       |          |
|   |                                     |   |       |          |

Approved By:  Date: 5/11/09



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Attachment #3  
99901052/2009-201-03

### Employee Training Record

Date: 5/11/09

Subject: Commercial Grade Survey - Calibration Suppliers

Instructor: David Menstiel

Time: 1/2 Hour

| Attendees Name     | Department          | Signature/Initials    |
|--------------------|---------------------|-----------------------|
| <u>Harry Dodds</u> | <u>Lead Auditor</u> | <u>Harry W. Dodds</u> |
|                    |                     |                       |
|                    |                     |                       |
|                    |                     |                       |
|                    |                     |                       |

Outline of Subject  
Reviewed NRC Nonconformance for PNC Lonestar "Audit" of 12/6/06 which is actually a Commercial Grade Survey. Reviewed Commercial Grade Survey Critical Characteristics for Calibration Suppliers.

Instructors Signature: David Menstiel

Title: QA Manager