

**To** **Mr. Juan PERALTA**  
**Chief Quality and Vendor Branch 1**  
**Division of Construction Inspection and**  
**Operational Programs Office of New Reactors**

**Object :** **NRC –REPORT 99901381/2009-201**

**Our Ref.** **EFCFD 090925**

Dear sir,

Please find here after our answers to violation notice (1) and non conformance notices (2) identified by NRC team during the inspection led at CREUSOT FORGE site from 2009, July 20<sup>th</sup> to 24<sup>th</sup>.

▪ **Violation notice**

Violation notice point 1 : Regarding implementation by CREUSOT FORGE a corrective action sheet is opened n° 09/059.

*Copy of the corrective action CREUSOT FORGE 09/059 is attached as appendix 1.*

CREUSOT FORGE has fully revised its Quality procedure related to the management of the non conformities.

*Please find as attached appendix 1.1, our QA procedure PRM004 – Control of non conformances including 10 CFR part 21 process.*

CREUSOT FORGE is integrated within AREVA NP Company and the defects are reported to AREVA NP liaison officer. The process map (included in the QA procedure) presents the global process starting from CREUSOT FORGE to NRC.

The particularity of our 10 CFR part 21 process is that CREUSOT FORGE could be alternatively a supplier within AREVA NP organization or to have by itself its own suppliers.

Please let us to know your comments on this QA procedure.

Violation notice, point 2 : Regarding the last point of the notice related to the procurement documents, our explanations are:

1\_ The inspection tooks as example the relation between CREUSOT FORGE and its supplier ARECLOR MITTAL INDUSTEEL for the delivery of ingots. (Which could be following NCA 3800 application classified as unqualified source material).

2\_ The contract between CREUSOT FORGE and its supplier is a generic contratc between two companies established for several years. One part of the contract is the QA prescription CF INS034.

*QA prescription CF INS034 is attached as appendix 1.2*

3\_ For this reason, order for one ingot does not need to refer to all standards but only to CF INS034. By the contract the content of the QA prescription CF INS034 is fully and permanently applicable to all ingots supplied by the melting shop to CREUSOT FORGE. Note that this QA procedure was also distributed by CREUSOT FORGE to the melting shop as "controled copy for application".

*Copy of the acknowledgement of the QA prescription, see appendix 1.3*

4\_ This QA procedure refers explictly to the safety regulation 10 CFR part 21 as reference (section 3).

5\_ Beside this QA procedure a compliance matrix is drawn up (See appendix 1.4). This matrix demonstrates that the Quality Manager of the melting shop have checked the conformity of the melting shop's QA system to the related standards. One of them is the 10 CFR part 21.

*Copy of the complaince matrix, see appendix 1.4*

*Copy of the acknowledgement of the compliance matrix, see appendix 1.5*

6\_ Consequently we suggest that NRC evaluation considers that the melting shop is fully informed that the regulation 10 CFR part 21 is applicable for all supplies to CREUSOT FORGE including, of course, ingots supplies for US market.

7\_ The audit of the supplier ARECLOR MITTAL INDUSTEEL led at the midle of September 2009 took based on the NRC inspection feedback. It was identified a lack of consistency in the understanding of the 10 CFR part 21 regulation. A non conformity sheet will be adress soon to INDUSTEEL.

▪ **Non conformance 1 for inappropriate reference of QA Manual**

The corrective action sheet CREUSOT FORGE 09/046 opened and closed during the time of the NRC inspection.

*Copy of the corrective action 09/046 is attached as appendix 2.*

The corrective action was to state that there is no impact in the content of the audit performed because the modifications introduced in the new edition of the QA Manual did not have any impact on the scope of the concerned internal audit.

The audit report was corrected.

A training was performed to the individuals in fault.

▪ **Non conformance 2 for calibration of thermocouples**

A copy of the corrective action sheet opened during the time of the NRC inspection ref. CREUSOT FORGE 09/047.

*Copy of the corrective action 09/047 is attached as appendix 3.*

As decision, the internal procedure CF INS040 was modified immediatly in order to get back to the conformity to the NB 2360 and presented for review to the NRC inspectors during the time of the audit.

It was checked that no tests were performed with the wrong criteria of calibration for thermocouples.

A sticker with a limitation of the date of using was put on the related devices in order to prevent its use out of the NB 2360 limits.

As preventive action we decided to have an internal committee of reading for all internal procedure implemented. The goal is to check at periodical time the conformity of such procedure to the standards. The expected date for hold the first meeting is end of october 2009. Waiting for that, the corrective action is stil opened.

We are now waiting for your comments.  
Best regards.

Patrick TRIOEN  
Quality Manager  
CREUSOT FORGE