tyco
Flow Control

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REPLY TO A NOTICE OF NONCONFORMANCE

November 16, 2009

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

Subject: Reply to Notice of Nonconformance
NRC Inspection Report No. 99900293/2009-201
Nonconformance 99900293/2009-201-03

Dear Sir:

Pursuant to the instructions in the notice of nonconformance, please find herein Anderson Greenwood Crosby's response.

Nonconformance 99900293/2009-201-03 is the failure of AG Crosby to implement its procedures for control of measuring and test equipment as required by Criterion XII, "Control of Measuring and Test Equipment", of Appendix B to 10 CFR Part 50. Specifically:

(1) A set of gage blocks (INSP110F) used as a primary standard were out of calibration at the time of the NRC inspection.
(2) Post-calibration checks of the inspection gages used to final dimensional inspect two valves were not documented as required.
(3) The temperature and humidity in the calibration area had not been documented for the week prior to the NRC inspection as required.

Our response to the nonconformance is as follows.

Reason for the violation

(1) The "next calibration due date" for gage blocks INSP110F had been incorrectly entered in the M&TE control database as August, 2009.
(2) It was AG Crosby's understanding that the dimensional check on assembled valves were verifying dimensions on the customer approved data sheet drawing; that the inspections were "as built" verifications for the customer, not Code required inspections, and therefore the calibration requirements of QC-110 did not apply.
(3) The gage calibration inspector normally on duty was on vacation, and the back-up inspector had taken ill. The temperature and humidity were immediately checked, and were within limits. The QC Supervisor indicated that at no time during the period when no recordings had been made was the temperature or humidity excessive.

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Corrective steps that have been taken and the results achieved

(1) The "next calibration due date" for gage blocks INSP110F was corrected in the M&TE control database and the gage blocks were immediately re-calibrated. No changes from the July 2008 calibration were found; therefore calibrations using the gage blocks since July 7, 2008 were unaffected. All primary standards in the M&TE database have been checked for similar errors to insure calibrations are scheduled within the required 12 months.

(2) AG Crosby will perform and document post-calibration checks of the inspection gages used to dimensionally inspect each valve. Training has been performed for each inspector emphasizing the requirement. Training has been performed for each QA Records Specialist emphasizing verification of post-calibration documentation before releasing valves for shipment.

(3) The QC Supervisor has been trained to measure and record temperature and humidity whenever the gage calibration inspectors are absent.

Corrective steps that will be taken to avoid further violations

(1) The "next calibration due date" requirements of the M&TE database have been reviewed with the inspectors and their supervisor to insure all understand the requirements. A training record has been generated to document the training.

(2) Measures have been established requiring all measuring equipment used in inspections, including final dimensional inspections, have their calibration accuracy verified and documented immediately after the inspection.

(3) The QC Supervisor has been trained to measure and record temperature and humidity.

Date when full compliance will be achieved

Full compliance has been achieved for all three instances of nonconformance.

Sincerely,

D. E. Tuttle

David E. Tuttle
Quality Assurance Manager
Anderson Greenwood Crosby

cc: Juan Peralta, Chief
Quality and Vendor Branch 1
Division of Construction Inspection
& Operational Programs
Office of New Reactors