tyco
Flow Control

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REPLY TO A NOTICE OF NONCONFORMANCE

November 18, 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 99900293/2009-201-04

Dear Sir:

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

Nonconformance 99900293/2009-201-04 is the failure of AG Crosby to implement its corrective action program as required by Criterion XVI, "Corrective Action", of Appendix B to 10 CFR Part 50. Specifically:

(1) The AG Crosby Quality Assurance Manual does not provide a mechanism to ensure that conditions adverse to quality which are identified by AG Crosby's customers are systematically reviewed, documented, and addressed. Specifically, components which were returned to AG Crosby due to nonconforming specifications or other quality-related issues, were not consistently directed to the CAR manager for review and evaluation and no documentation that specifically identified customer-related issues was identified during the inspection.

(2) CAR I-317 did not identify or document any corrective action taken, actions to prevent recurrence, a proposed completion date, or follow up actions to be taken as required by the AG Crosby Quality Assurance Manual. Additionally, follow-up actions described in CAR N-342, dated August 8, 2008, were not completed in the prescribed timeframe.

Our response to the nonconformance is as follows.

Reason for the violation

(1) Nonconformances identified by AG Crosby's customers are documented and reviewed by the QA Manager in accordance with Departmental Operating Instruction DOI-QA-48-3051. The DOI requires nonconformances which could result in a substantial safety hazard as defined by the Code of Federal Regulations Title 10, Part 21, ro be processed in accordance with procedures outlined in the AG Crosby DOI QA-48-3016. However, QC-110 does not provide a reference to DOI QA-48-3051, nor does it directly provide requirements for addressing conditions adverse to quality identified by AG Crosby's customers.

(2) The QA Engineer did not follow up on CAR I-317 as required by QC-110. For CAR N-342, the planned completion date of 31 Dec 2008 was overly ambitious. The original planned corrective action could not be accomplished, and the revised corrective action took several months to accomplish.

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Corrective steps that have been taken and the results achieved

(1) QC-110 will be revised to require nonconformances identified by customers to be handled in accordance with DOI QA-48-3051.

(2) The root cause for CAR I-317 has been determined and documented; the corrective action has been determined and completed. Follow-up has confirmed the corrective action has been effective. The CAR was closed on August 6, 2009.
The planned corrective action for CAR N-342 was determined to be an ineffective corrective action and has since been revised and completed. Training has been conducted and documented. Follow-up three months afterwards has confirmed the corrective action has been effective.

Corrective steps that will be taken to avoid further violations

(1) All possible methods of obtaining customer identification of nonconformances will be reviewed to insure they are directed to the QA Manager for review.

(2) The CAR log will be reviewed every month and the status reviewed by the QA Manager as part of the QA monthly report. Any overdue action will be referred to the General Manager for action.

Date when full compliance will be achieved

(1) QC-110 is in the revision process, which will be submitted to the ANI Supervisor for approval. Expected to be completed by Feb 16, 2010 (90 days).

(2) Full compliance has been achieved.

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