



**Tyco Electronics High
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November 9, 2010

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

Subject: Reply to a Notice of Violation and Reply to Notice of Nonconformance

Dear Sir or Madam,

The purpose of this memorandum is to document actions taken by Tyco Electronics pursuant to the Nuclear Regulatory Commission (NRC) notice of violation 999013967/2010-201-01 and notice of nonconformance 99901397/2010-201-02 and 99901397/2010-201-03

This response was due on November 5, 2010. An extension to the due date of one week was requested for the following reasons:

1. We had needed clarification on the some of the corrective actions which was received on October 26, 2010.
2. A key person was on travel the week of November 1, 2010.

This extension to November 12, 2010 was granted in an email from the NRC, Aaron Armstrong, dated November 3, 2010.

NRC Notice of Violation 999013967/2010-201-01

Contrary to the above as of September 3, 2010:

Tyco Electronics' TECHS form 4725-9 failed to prescribe an appropriate procedure to initially identify a deviation for evaluation, as required in 10 CFR Part 21, "Reporting of Defects and Noncompliance."

Tyco Electronics response:

Reason for Violation:

The 8D form is a reporting form only, not a process for evaluation. The form F-1248 is used for all returned material. It requires a review for Part 21 applicability. Upon discussion with NRC on 10/26/10, it was determined that they felt the procedures did not necessarily lead one to that form. This was a documentation error only. The evaluation was being carried out.

Corrective Actions Steps that have been taken and the results achieved:

DCO 131341 was issued to update PP-19-001 Servicing and PP-14-001 Corrective Action Requests procedures to specify the need for the evaluation of a defect for Part 21 applicability.

Corrective Steps to Avoid Further Violations:

The requirement to evaluate Part 21 applicability will also be included in the internal corrective action form for systemic issues.

Date when full compliance will be achieved:

DCO 131341 was completed on 10/27/10. The Internal Corrective action system change will be effective 11/30/10.

NRC Notice of nonconformance 99901397/2010-201-02

Contrary to the above as of September 3, 2010:

1. Tyco Electronics' dedication program did not provide any objective evidence that technical evaluations had been performed to assure that the materials, parts, equipment and processes used for the manufacturing of the Agastat (E7000) were evaluated under the dedication program and would perform their intended safety-related function.

2. Tyco failed to document technical justifications for design process changes.

Reason for Non Conformance:

(1). TE committed and has completed an exhaustive effort to establish drawing trees to properly identify all product critical characteristics. However, it is agreed that technical justification for our selection of these features was not fully captured at the time of evaluation. This was a human oversight in the desire to complete the identification. Proper thought was not put into documenting the actual thought processes into a justification. (2) TE maintains a design/process change history letter for all relevant product/process changes since production qualification. This was also a human oversight in not documenting the justifications for those changes.

Corrective Actions Steps that have been taken and results achieved - (1) TE has reestablished the technical review team and capture/record the technical justification for each critical feature identified in the established drawing trees. (2) TE agrees to add technical justifications to the change history letter in explanation as to why the specific change has not impacted the product performance in regards to original part qualification.

Corrective Steps to avoid nonconformance:

These actions are detailed above.

Date when full compliance will be achieved:

These actions will be completed by 2/4/2011.

NRC Notice of nonconformance 99901397/2010-201-03

Contrary to the above as of September 3, 2010:

Tyco Electronics failed to perform a documented evaluation of any supplier's performance.

Reason for Non Conformance:

Tyco Electronics was performing a documented audit of our three critical suppliers on a tri-annual basis. TE was unaware that a documented annual evaluation was required. Only one of

the three vendors (Williams) in question was subjected to the annual evaluation as a strategic supplier.

Corrective Actions Steps that have been taken:

The remaining two suppliers were Chand Eisenman and Applied Testing Services. Chand Eisenman has been added to the strategic supplier list which will require the annual evaluation. ATS as a service supplier will be evaluated locally by the QA organization as a strategic supplier for our facility only on an annual basis.

Corrective Steps to avoid noncompliance:

These actions are detailed above

Completion Dates

The first evaluations on both will be completed by 12/31/10.

Sincerely,



Scott Daubert
Quality Assurance Manager
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cc: Director, Division of Engineering
Office of Nuclear Reactor Regulation