


MITSUBISHI HEAVY INDUSTRIES, LTD.
16-5, KONAN 2-CHOME, MINATO-KU
TOKYO, JAPAN

November 1, 2011

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

Attention: Mr. Jeffrey A. Ciocco

Docket No. 52-021
MHI Ref: UAP-HF-11370

Subject: Reply to a Notice of Violation NO. 05200021/2011-201

Reference: 1) MITSUBISHI HEAVY INDUSTRIES' RESPONSE TO THE U.S. NUCLEAR REGULATORY COMMISSION INSPECTION REPORT 05200021/2011-201 AND NOTICE OF VIOLATION dated August 9, 2011
2) THE NUCLEAR REGULATORY COMMISSION LETTER dated October 4, 2011 (ADAMS Accession NO.: ML11277A201)

With this letter, Mitsubishi Heavy Industries, Ltd. ("MHI") transmits to the U.S. Nuclear Regulatory Commission ("NRC") the responses to Notice of Violation No. 05200021/2011-201 (Reference 1) and the NRC letter dated October 4, 2011 (Reference 2).

Please contact Dr. C. Keith Paulson, Senior Technical Manager, Mitsubishi Nuclear Energy Systems, Inc. if the NRC has questions concerning any aspect of the submittals. His contact information is below.

Sincerely,



Yoshiaki Ogata,
General Manager- APWR Promoting Department
Mitsubishi Heavy Industries, LTD.

Enclosure:

1. Reply to a Notice of Violation (NOV)

DOB
NRD

CC: J. A. Ciocco
Juan D. Peralta
C. K. Paulson

Contact Information

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Enclosure 1

UAP-HF-11370
Docket No. 52-021

Reply to a Notice of Violation (NOV)

November, 2011

Reply to a Notice of Violation (NOV)

NOV-B (NRC Identification No. 05200021/2011-201-02)

MHI will provide an additional explanation for NOV of NRC inspection for sump strainer testing at Alden Research Laboratory to include corrective action for MHI failure.

1. Contents of NRC comments on MHI letter for response of NOV

MHI response to NOV 05200021/2011-201-02 regarding unapproved changes being made in the field by the AREVA test engineer was found to be inadequate because it does not address the cause for Mitsubishi Heavy Industries' (MHI) failure to verify that changes to the test procedure were being reviewed and approved as the original document as required by AREVA Document 56-9141754, "Quality Assurance Program."

2. Additional explanation to address the violation

The transmission of requirements from MHI to AREVA via PCI is not sufficient. Because the current Purchase Specification to PCI does not clarify the MHI requirements for QA activities by AREVA.

3. The corrective steps that have been taken and the results achieved

Corrective Action Report was issued to include as follow:

To transmit the MHI requirements for QA activities to AREVA via PCI, the purchase specifications shall be revised when next testing will be purchased to PCI. MHI uses the Qualified Vendor List (QVL) during generating the purchase specifications to vendors. Therefore, description of scope to PCI on QVL will be revised to correct "Design & Analysis, Qualification Testing, including control of procurement" to "Design & Analysis, Qualification Testing, including control of procurement. In case of using vendors for Qualification Testing, prior to start the testing, PCI shall perform the oversight to verify that the vendors' QA activities are compliant with MHI QA requirements."

As a result of this corrective action, the future purchase specification for Qualification Testing to PCI will be generated including the requirement of oversight to AREVA by PCI prior to the start of the testing.

MHI determined to perform a surveillance of PCI/AREVA prior to commencing the next testing.

4. The date when your corrective action will be completed

The corrective action will be completed on December 31st, 2011.