



NUCLEAR PRODUCTS OPERATIONS

23 Nov 2011

Vernon Nuclear Pump Operations, Vernon, Ca 90058
Charlotte Nuclear Service Center, Charlotte, NC 28269

To : US NRC, Att'n Document Control Desk
From: David P. Gobbi, Quality Manager, Flowserve NPO
Subject: Reply to a "Notice of Violation"
Reference: Flowserve response to Violation # 99901369/2011 – 202 - 01

This is to document:

1. The reason for the violation
2. The corrective steps that have been taken
3. The corrective steps that will be taken to avoid further violations
4. The date when full compliance will be achieved.

Violation:

Flowserve had failed to provide a written report of a Formal Evaluation concerning the disposition of an item's deviation with regard to its impact to a safety-related function within the 60 days allowance for such evaluation. Further, Flowserve did not request an extension of the 60 day evaluation period.

Reason for the violation:

Procedures did not explicitly identify the discover point, which begins / impacts the 60 day evaluation timeline;
The Formal evaluation was conducted well within the 60 day evaluation period, however – the report was dated beyond that period;
The Formal Evaluation Report did not provide objective evidence of the date of the evaluation;

Corrective steps that have been taken:

Flowserve Corrective Action No. 104172 had been initiated to provide root cause analysis and corrective measures:
Flowserve Vernon Procedure QA-1717, Control of Nonconforming Items, has been revised to define the 'point of discovery';
NPO Procedure NPO-NNP-02, Reporting of Defects Which May Result in Substantial Safety Hazards, has been re-written to NPO-NNP-03 to define the 'point of discovery',
NPO Procedure NPO-CNP-02, Implementation of the Nuclear Products Operations' Corrective Action Program, has been re-written to NPO-CNP-03 to define the discovery point and the steps of the CAR process involving the evaluation of deviations;
NPO Form No. NPO-NNF-07, Formal Evaluation of Deviation For Impact To Safety, has been created to provide consistency in the reporting method of Formal Evaluations and to provide objective evidence of the Formal Evaluation.

Corrective steps that will be taken to avoid violations:


Training will continue through the Final Approval of the aforementioned procedures and related form. The training will be documented and the Formal Evaluation process, including adherence to reporting timeline, will be included in the annual internal audit program.

The date when full compliance will be achieved:

Corrective Action No. 104172 will include a follow-up action to confirm the final procedure approval and applicable training during the week ending December 9, 2011.
Closure of the Internal CAR is predicated by the NRC acceptance of this response and is anticipated before January 1, 2012;
Controlled distribution of the procedures and form is scheduled for the week ending December 16, 2011.

This response is submitted in anticipation of closure of the referenced violation by.....

Cc: Director, Division of Inspection and Regional Support

David P. Gobbi,

Quality Manager,
Nuclear Products Operations
Flowserve Corporation

FLOWSERVE PUMP DIVISION NUCLEAR PRODUCTS OPERATION

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