



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 Nonconformance"
Reference: Flowserve response to Nonconformance # 99901369/2011 – 202 - 02

This is to document:

1. The reason for the Noncompliance
2. The corrective steps that have been taken and the results achieved
3. The corrective steps that will be taken to avoid non-compliances
4. The date when full compliance will be achieved

The Noncompliance:

While Flowserve procedure QA-1717 Revision B, Quality Department Control of Nonconforming Items, does not identify "cancel" as type of disposition permitted for use on nonconformance documents, Flowserve quality control has used "cancel" as a disposition.

Reason for the Noncompliance:

Procedure QA-1717 Revision B was not updated to reflect required the use of "cancel" as a types of dispositions.

The corrective steps that have been taken and the results achieved:

Flowserve has initiated Internal Corrective Action No. 104173 to provide a basis to determine corrective measures and to complete actions in a timely manner. Flowserve Facility-Specific Procedure QA-1717, Revision B, Quality Department Control of Nonconforming Items, has been revised to include "cancel" as a type of disposition to be used on nonconformance documents. The approved procedure revision also identifies the responsible authorities and the controls for determining and approving "cancel" nonconformance dispositions. While procedural training has been conducted, the process controls as described therein have not yet been verified as there have been no opportunities presented for the use of "cancel" as a disposition.

Corrective steps that will be taken to avoid non-compliances:

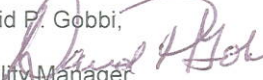
The Facility Internal Audit program will include a review of non-conformance documents that have dispositions as cancel. The audit checkpoint shall include a review of the applicable documents for adherence to the controls and methods described in the revised procedure.

The date when full compliance will be achieved:

Corrective Action No. 104173 will include a follow-up action to confirm proper implementation of the controls related to this revision. 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 procedure is scheduled for the week ending December 16, 2011.

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

Cc: Director, Division of Inspection and Regional Support

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