



1801 Route 51  
Jefferson Hills, PA 15025  
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U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555-0001

June 4, 2012

**REPLY TO A NOTICE OF VIOLATION**

Docket No.: 99901412  
**Violation 99901412/2012-201-01**

Inspection Report No.: 99901412/2012-201

To Whom It May Concern:

Provided below please find our reply to the subject violation, summarized as follows:

*As of March 23, 2012, Clark failed to adopt appropriate procedures in accordance with 10 CFR 21.21(a)(2) and 10 CFR 21.21(a)(3). Specifically, Clark's 10 CFR Part 21 implementing procedure, QAP 08.03.02 "Reporting of Defects and Noncompliances to the NRC," Revision 0 dated July 26, 2010 failed to include the following provisions:*

- 1. Ensure that if an evaluation cannot be completed within 60 days from discovery of the deviation or failure to comply, an interim report is prepared and submitted to the Commission through a director or responsible officer or designated person within 60 days of discovery of the deviation or failure to comply.*
- 2. Ensure that a director or responsible officer is informed as soon as possible and, in all cases, within 5 working days after completion of the evaluation.*

**Reason for the Violation**

This was an oversight during the creation of the initial version of QAP 08.03.02.

**Corrective Steps That Have Been Taken and the Results Achieved**

Clark's QAP 08.03.02 has been modified (Revision 2 dated March 29, 2012) to specify the requirement for interim reporting through a responsible officer (the Clark QA Manager or designate) to the NRC in cases where the evaluation of the discovered deviation or failure to comply will take more than 60 days, and the requirement for internal reporting (to the Clark QA Manager or designate) as soon as possible and, in all cases, within 5 working days after completion of the evaluation. We also added an easy to follow flowchart of the reporting process. As a result, our 10 CFR Part 21 implementing procedure is now complete and more clear. Training was conducted for all appropriate employees on March 29 and April 4, 2012, and the revised procedure was posted in the shop.

**Corrective Steps That Will Be Taken**

All necessary corrective steps have been taken, as described above.

**Date When Full Compliance Will Be Achieved**

Full compliance was achieved as of April 4, 2012 as described above.

Please don't hesitate to contact me if you have any questions or need further information.

Sincerely,

Gary Felicetti  
QA Manager  
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IED9  
NRD



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Cc: Chief, Mechanical Vendor Branch  
Division of Construction Inspection and Operational Programs  
Office of New Reactors  
U.S. Nuclear Regulatory Commission  
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