

July 25, 2012

Mr. Paul Russ, Director
AP1000 Licensing Programs
CWHQ-1 512B
Westinghouse Electric Company
1000 Westinghouse Dr.
Cranberry Township, PA 16066

SUBJECT: WESTINGHOUSE ELECTRICAL COMPANY RESPONSE TO THE NUCLEAR
REGULATORY COMMISSION INSPECTION REPORT 99901043/2012-201,
NOTICE OF NONCONFORMANCE – REQUEST FOR ADDITIONAL
INFORMATION

Dear Mr. Russ:

Thank you for your July 2, 2012, letter in response to the Notice of Nonconformance (NON) that was discussed in the subject U.S. Nuclear Regulatory Commission (NRC) inspection report (IR).

We reviewed your letter and found that it was not fully responsive to issues discussed in IR 99901043/2012-201. Specifically, your response to NON 99901043/2012-201 did not provide adequate detail for the staff to conclude that there are no adverse effects on other AP1000 components and testing activities, and your proposed corrective actions would meet the requirements of Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, "Domestic Licensing of Production and Utilization Facilities."

- 1) Your response to NON 99901043/2012-201-01 indicated that the requisitioner inadvertently failed to include required supplier restrictions in purchasing documents, which were also missed by approving quality assurance personnel.

Please clarify if any procurement process changes were enacted to prevent future reoccurrence, and, if not, provide your rationale. Additionally, please provide the results of your evaluation of extent of condition and analysis of effects on other AP1000 components or testing activities (as requested in the cover letter to the IR 99901043/2012-201). Your response should include an analysis of potential missing supplier restrictions in purchasing documents beyond the inspector identified examples.

- 2) Your response to NON 99901043/2012-201-02 addressed the NON as follows:

"Three restrictions from Commercial Grade Survey Report WES-2011-121 were entered into the Westinghouse Qualified Suppliers List (QSL) following the completion of the survey. A human error was made that caused one of the three restrictions to be replaced with a new restriction, rather than adding the new restriction. Corrective actions to avoid non compliance included correcting the QSL to include all restrictions

applicable to the supplier and making personnel aware of the potential for such human errors.”

This response is unacceptable because your response did not address the failures mentioned in NON 99901043/2012-201-02. Please provide the details of how all the failures outlined in NON 99901043/2012-201-02 were addressed and what corrective actions are anticipated or were completed to prevent reoccurrence in each case. Additionally, please clarify the information provided in your response by providing the results of your evaluation of extent of condition and your analysis of effects on other AP1000 components or testing activities

- 3) Please clarify information provided in your response to NON 99901043/2012-201-03 as follows:

“Better acceptance criteria should have been defined by performing better procedure Dry-running. Seeing that the steady state voltages across the DC loads, with the circuit breakers open, are very small (< 0.2 VDC), + or – 1 VDC could have been arbitrarily chosen as acceptance criteria, since it is known that this voltage would not be sufficient to energize any DAS DC loads.”

A better defined acceptance criteria would still not address the original issue as described in NON 99901043/2012-201-03. A test anomaly outside the proposed acceptance range was noted due to the test configuration. Please outline how you evaluated the steps and changes made by the design engineer to the original test configuration so that the noted test anomaly fell within the proposed acceptance criteria range. Your response should also provide how the change in test configuration does not invalidate the original design requirements.

Please provide the evaluation of extent of condition for the deficiency described in NON 99901043/2012-201-03. Your response should include an evaluation of other design engineering test logs that were used in other qualification packages to ensure that original design test requirements and acceptance criteria have been met. Your response should provide sufficient detail to allow inspectors to conclude that test anomalies in test logs have been adequately documented and evaluated. Your response should also outline the process used when design engineers work with test engineers, as it appeared that the test engineers were not cognizant of the inspector identified test anomaly.

- 4) Your response to NON 99901043/2012-201-04 indicated that you are tracking implementation of two corrective actions (relating to analysis of sensitive “frequencies” and “operating and climate conditions”) that will assure inspector identified failures to conform to Regulatory Guide 1.180 are “documented in the EMC [Electromagnetic Compatibility] qualification report.” Please provide the Corrective Action Program tracking numbers.

Additionally, please provide the results of your evaluation of extent of condition and analysis of effects on other AP1000 EMC activities. Your response should include an analysis of other potential failures to conform to the provisions of RG 1.180 beyond the inspector identified examples. Please clarify if any Westinghouse or WLL process changes were enacted to prevent future reoccurrence, and, if not, provide your rationale.

Please provide a written response to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001, with a copy to the Chief, Electrical Vendor Branch, Division of Construction Inspection and Operational Programs, Office of New Reactors, within 30 days of the date of this letter. This reply should be clearly marked as a "Reply to NRC Inspection Report 99901043/2012-201, Notice of Nonconformance – Request for Additional Information."

In accordance with Title 10 of the *Code of Federal Regulation* (10 CFR) 2.390 "Public Inspections, Exemptions, Requests for Withholding," of the NRC's "Rules of Practice," a copy of this letter, its enclosure(s), and your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System, accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request that such material is withheld from public disclosure, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21 "Protection of Safeguards Information: Performance Requirements."

Please contact Mr. George Lipscomb at (301) 415-6838 or via electronic mail at George.Lipscomb@nrc.gov, if you have any questions or need assistance regarding this matter.

Sincerely,

/RA/

Richard A. Rasmussen, Chief
Electrical Vendor Branch
Division of Construction Inspection
and Operational Programs
Office of New Reactors

Docket No.: 99901043

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Sincerely,

/RA/

Richard A. Rasmussen, Chief
 Electrical Vendor Branch
 Division of Construction Inspection
 and Operational Programs
 Office of New Reactors

Docket No.: 99901043

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