



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

SUBJECT: Reply to a Notice of Violation; Violation 999013777/2012-201-01

Identified Violation:

Enertech evaluated two issues concerning the arcing and short-circuiting of valve actuator circuit boards and concluded that the issues did not pose a significant safety hazard (SSH). However, there is no objective evidence that Enertech properly evaluated the shipped circuit boards in their various applications at numerous licensees to make a definitive SSH determination.

Cause:

The Part 21 Evaluation failed to adequately document the details of evaluation in their various applications that had been performed by Enertech regarding this issue due to implied engineering reasoning verses procedural controls. No defect or deviation was identified during the evaluation in product design, manufacturing, or workmanship.

Corrective Action:

Following Enertech Procedure EOP 8200, the Evaluation (NRC 11-002) was revised to document the full extent of evaluation information identified as lacking during the NRC Inspection. In addition, the installed base worksheet was enhanced to identify safety function, plant application, and failure mode. The revised Evaluation (Document number NRC 11-002 Rev 1) was completed on 11/15/12. A copy of the cover page is provided as objective evidence.

Preventative Action:

The Procedure EOP 8200 was revised to include specific language to ensure Part 21 Evaluations document full scope of evaluation, including key factors such as application, Safety Function, and Failure Mode. The revised procedure was released on 11/15/12 for implementation. A copy of the EOP cover page is provided as objective evidence.

If you have any questions regarding this issue, please contact me at your convenience.

Respectfully Submitted,


Stanley Miller
General Manager

IED9
NRD

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CUSTOMER
STANDARD

REV.
1

DRAWING NUMBER
NRC 11-002

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**10CFR PART 21 EVALUATION OF ENERTECH
GENERATION II SERVO BOARD INSTALLATION
(WASHERS)**

10CFR PART 21 EVALUATION

OF

**ENERTECH GENERATION II SERVO BOARD INSTALLATION
(WASHERS)**

ENERTECH PART 21 EVALUATION 11-002


Prepared by: _____

14 November 2012
Date


Checked by: _____

14 Nov 2012
Date


Approved by: _____

11/15/12
Date



ENERTECH Operating Procedure

EOP	8200	REV	S
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Title Reporting requirements concerning Defects & Noncompliance per 10CFR Part 21.

Prepared By T.M. Cottrill Date 7/19/89

Approved By W.J. O'Brien Date 7/19/89

QA Approval T.M. Cottrill Date 7/21/89

RECORD OF REVISIONS							
REV	DESCRIPTION	BY	DATE	APP'D	DATE	QA	DATE
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S	Revised par: 6.5.2, 6.5.3, 6.6.1 (iii),	<i>[Signature]</i>	11/15/89	<i>[Signature]</i>	11/15/89	<i>[Signature]</i>	11/15/89

Please refer to original cover sheet in archives for signatures and record of revisions.