

December 12, 2012

Mr. John DeBonis, Quality Assurance Manager
Curtiss-Wright Flow Control Company
Target Rock Division
1966E Broadhollow Road
East Farmingdale, New York 11735-1768

SUBJECT: NUCLEAR REGULATORY COMMISSION INSPECTION REPORT
99900060/2012-201, NOTICE OF NONCONFORMANCE – REQUEST FOR
ADDITIONAL INFORMATION

Dear Mr. DeBonis:

Thank you for your November 19, 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 have reviewed your letter and found that it was not fully responsive to two of three NONs discussed in IR 99900060/2012-201. NON 99900060/2012-201-01 relates to verification of electrical performance characteristics of a terminal block, and NON 99900060/2012-201-03 relates to relying on a commercial supplier-issued certificate of conformance as the sole method of acceptance during commercial-grade dedication (CGD) receipt inspection without conducting a commercial grade survey or other verification of the quality controls of the supply chain.

Your response to these two NONs did not provide adequate detail for the staff to conclude that your proposed corrective actions would completely address the identified nonconformances.

Specifically,

1. In your response to NON 99900060/2012-201-01, you stated that Target Rock (TR) will redesign all the Critical Characteristics Attribute Verification (CCAV) sheets to clarify CGD Method 2 requirements, revise its Approved Supplier List changing the status of the suppliers to unapproved in order to prevent purchasing department from inadvertently placing purchase orders, and conduct training.

Please clarify how TR has ensured that previously received terminal blocks met all required electrical performance requirements as part of its dedication process. A key element of 10 CFR Part 21 is the evaluation of defects that could cause a substantial safety hazard for components previously shipped. We consider your evaluation of previously received components critical to meeting this obligation. Your response indicates future verifications will be by commercial-grade survey, but is unclear if an evaluation of received product or if a verification of distributor/supplier quality program controls has been completed to date. The inspectors noted that Problem Report (PR) 071 primarily evaluates the material composition of the terminal block screws and not the electrical performance characteristics of the terminal block.

Additionally, please clarify if TR has or will revise its quality assurance or dedication program/procedures to ensure any process changes are incorporated. Your response indicated that only the CCAV form was updated.

2. In your response to NON 99900060/2012-201-03, you stated that an extent of condition review was initiated for Terminal Block TR P/N 205674-2 which generated PR 071. Additionally, for pressure switch TR P/N 200372-1, your immediate actions included verification of all critical characteristics on all pressure switches in TR stock, and initiation of PR 073 for evaluation of affect on product.

Please clarify how TR has assured that the required supply chain (distributor and supplier) quality controls adequately control applicable critical characteristics during the manufacturing process for all components. This ensures the validity of a commercial supplier-issued certificate of conformance and provides reasonable assurance that the item received conforms to TR's procurement requirements. Your response indicates future verifications for the terminal board and pressure switch will be by commercial-grade survey, but it is not clear if an evaluation of appropriate control for all received product in this category was conducted. The inspectors noted that PR 073 primarily evaluated TR testing of pressure switches in-stock, but provided few details of how supplier quality controls met each CGD Method 2 verification. For example, pressure switch critical characteristic III.3, "Hydrostatic Test," is listed as a supplier survey item, but PR 073 is unclear if the three mentioned supplier tests, which were controlled under an unsurveyed AS9100 and ISO9001 program, meet TR dedication requirements.

Additionally for the pressure switch TR P/N 200372-1, please clarify if the supplier has modified any materials of construction or the switch design since the switch was qualified in 1975. The inspectors noted PR 073 stated the assembly and test processes have not changed since 1975, but did not note any information about the materials of construction or design.

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 99900060/2012-201, 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.: 99900060

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.: 99900060

DISTRIBUTION:

GGalletti
ASakadales
RidsNroDcipCMVB
shyang@kins.re.kr

RPatel
ERoach
RidsNroDcipCEVB
hkkim@kins.re.kr

KKavanagh
RidsNroDcip
jdebonis@curtisswright.com
mmjung@kins.re.kr

ADAMS Accession No.: ML12341A255 NRC-001

OFFICE	NRO/DCIP/CEVB	NRO/DCIP/CEVB
NAME	GLipscomb	RRasmussen
DATE	12/11/2012	12/12/2012

OFFICIAL RECORD COPY