



**Flow Control Operations**

*Anchor/Darling Valves  
BW/IP Valves  
Edward Valves  
Valtek Control Products  
Worcester Valves*

December 21, 2012

US Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555-0001

Mr. Edward H. Roach, Chief  
Construction Mechanical Vendor Branch  
Division of Construction Inspection and Operational Programs  
Office of New Reactors

**Subject: Flowserve Corporation – Raleigh NC – Amended Reply to Notice of Nonconformance #99901356/2012-201-01.**

Dear Mr. Roach,

This in response to NRC's finding that Flowserve Raleigh's initial response to the Notice of Nonconformance #99901356/2012-201-01, was not fully responsive to one of the issues discussed within the NON. Specifically our response did not address the documentation of technical evaluations for the dedications that had already been performed:

In accordance with the instructions outlined with the subject Notices of Nonconformance, Flowserve Corporation, Raleigh, NC, offers the following amended reply:

In regard to Notice of Nonconformance 99901356/2012-201-01:

The reason for this nonconformance, as stated in the Flowserve Corrective Action Request (CAR #943 Rev. 1) issued during the NRC Inspection (see attached) and as a result of our review of the NRC Inspection Report is that documentation of the technical evaluation that identifies critical characteristics for dedicated parts are not specifically required per our procedures. The proposed corrective action is to revise the Flowserve Raleigh SOI 70-39 to document technical evaluations and have the dedication sheets reference the applicable technical evaluation. This will be implemented by 12-31-2012.

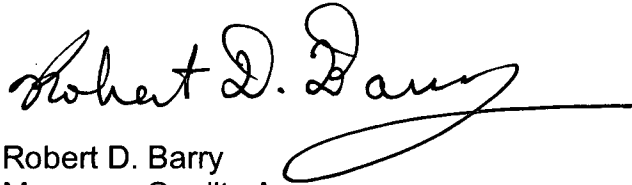
The dedication database will be changed to use the technical evaluation to identify critical characteristics for dedication. Existing and historical dedication sheets will also be revised to reference a Technical Evaluation, however due to the large number of historical dedication sheets the historical evaluation will not be completed until 12-31-2013.

If a technical evaluation reveals a historical dedication did not adequately identify the critical characteristics of a component, then an investigation into the impact of this condition will be addressed in accordance with the Flowserve's QA Program. As needed, non-conformance

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reports, corrective action requests, and / or 10CFR Part 21 Evaluations may be employed to resolve the issue.

Respectfully submitted,

A handwritten signature in black ink that reads "Robert D. Barry". The signature is written in a cursive style with a long, sweeping underline that extends to the right.

Robert D. Barry  
Manager, Quality Assurance  
Flowserve Corporation  
1900 South Saunders Street  
Raleigh, NC 27603



DATE INITIATED: 9/12/2012		PROPOSAL DUE: 12/21/2012	<b>CORRECTIVE ACTION REQUEST</b>
MANAGER/SUPERVISOR OR VENDOR: J. Tucker, R. A. Sizemore			
PART, RT# OR OTHER IDENTIFIER: Commercial Grade Dedication (CGD) Process			
10CFR21 EVALUATION REQUIRED? N		INTERNAL <input checked="" type="checkbox"/>	
HOW IDENTIFIED: During NRC Inspection		CAR # : 943 Rev. 1	
INITIATED BY: R. Slomski	CODE MATERIAL? N		IF CODE, ANI REVIEW
<b>PROBLEM STATEMENT</b> –( to be completed by QA or responsible department):			
Contrary to the requirements of 10CFR50 Appendix B, Criterion III – Design Control and Criterion XVII - Quality Assurance Records with further clarification provided in NRC Information Notice 2011-01 Section "Documentation of the CGD Process",			
<b>BELOW DESCRIBE THE CONDITION OR CIRCUMSTANCE VIOLATING THE ABOVE LISTED REQUIREMENT</b>			
NRC Inspectors found that Technical Evaluations for critical characteristics as part of the CGD process was not sufficiently documented.			
<b>ACKNOWLEDGEMENT OF RECEIPT OF THIS REQUEST</b> (BUYER ACKNOWLEDGES EXTERNAL REQUESTS)		<b>SIGNATURE/DATE</b>  12-20-12	
<b>ROOT CAUSE AND PROPOSED ACTION</b> (to be completed by responsible manager or designee)			
Documentation of the technical evaluation that identifies critical characteristics for dedicated parts is not specifically required per our procedures. Proposed corrective action is to revise the Flowserve Raleigh SOI 70-39 to document technical evaluations and have the dedication sheets reference the applicable technical evaluation. The dedication database will be changed to use the technical evaluation to identify critical characteristics for dedication. Complete by 12/31/12			
Existing and historical dedication sheets will also be revised to reference a Technical Evaluation but because of the large number of historical dedication sheets, this will not be completed until 12-31-2013. If a technical evaluation reveals a historical dedication did not adequately identify the critical characteristics of a component, then an investigation into the impact of this condition will be opened within Flowserve's QA Program to address the incident. If needed, non-conformance reports and corrective action requests will be generated to resolve the issue.			
<b>ACTIONS WILL BE COMPLETED BY (DATE)</b> 12/31/12 12/31/13		<b>SIGNATURE/DATE</b>  12-20-12	
<b>CORRECTIVE ACTION TAKEN TO PRECLUDE RECURRENCE:</b> (attach evidence of actions taken)			
<b>SUBMITTED BY (printed name)</b>		<b>SIGNATURE AND DATE</b>	
<b>CONFIRMATION OF CORRECTIVE ACTION TAKEN</b> (To be completed by Flowserve QA after review of evidence)			
<b>EVIDENCE SUFFICIENT TO CLOSE?</b> Y <input type="checkbox"/> N <input type="checkbox"/>		<b>FURTHER FOLLOW UP REQUIRED?</b> Y <input type="checkbox"/> N <input type="checkbox"/>	
<b>CORRECTIVE ACTION REVIEWED BY (QA Manager or Designee)</b>	<b>DATE</b>	<b>SIGNATURE</b>	

FORM Q-985 REV. 2