

January 17, 2013

Mr. Gian Marco Lupi, Quality Assurance Manager
Mangiarotti S.p.A
Via Timavo, 59
34704 - Monfalcone (GORIZIA) - Italy

SUBJECT: MANGIAROTTI'S RESPONSE TO THE U.S. NUCLEAR REGULATORY
COMMISSION INSPECTION REPORT NO. 99901416/2012-201 AND NOTICE OF
NONCONFORMANCE

Dear Mr. Lupi:

Thank you for your December 20, 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 one of the issues discussed in IR 99901416/2012-201. Specifically, your response to NON 99901416/2012-201-01 stated that the proposed corrective action is to revise Mangiarotti Management Procedure PGE.03, "Suppliers Selection and Assessment," to specify that non US based calibration service suppliers shall be qualified by direct audit unless or until the NRC permits otherwise. Since the NRC's recognition of the International Laboratory Accreditation Cooperation accreditation process is only limited to U.S. domestic calibration service suppliers, and not to international calibration suppliers, calibration services procured from an international calibration supplier without a quality assurance program meeting the requirements of Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities," must be dedicated in accordance with the licensees or suppliers commercial-grade dedication program. Please clarify your response to indicate what actions Mangiarotti will perform when procuring commercial-grade calibration services from an international calibration service supplier.

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. Yamir Diaz-Castillo at (301) 415-2228 or via electronic mail at Yamir.Diaz-Castillo@nrc.gov, if you have any questions or need assistance regarding this matter.

Sincerely,

/RA/

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

Docket No.: 99901416

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