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U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-001

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

SUBJECT: Reply to a Notice of Nonconformance

Dear Mr. Roach:

This letter is to serve as a response to the Nuclear Regulatory Commission Inspection Report No. 99900746/2013-201, and Notice of Nonconformance, dated March 21, 2013. Throughout this letter, I will describe the WVC Corrective Actions issued for each of the six (6) NON's described in the NRC Inspection Report.

NON 99900746/2013-201-01

This NON was issued in regards to 10CFR 50 Appendix B, Criterion III, due in part to specific issues dealing with the Commercial Dedication Process. During the course of the Inspection, WVC issued CAR's 13-41, 13-42 & 13-43 in response to the issues cited. After a further review of the issues, CAR 13-42 was rescinded because the issue was being addressed on CAR 13-41.

CAR 13-41 was issued to address the following conditions which were identified in Weir Procedure CP-E-18, "Control of Commercial Grade Items to be Dedicated for Use in Nuclear Safety-related Applications": the definitions of Commercial Grade Items, Critical Characteristics and Dedication do not match 10CFR Part 21; the procedure allows the dedication even if the Critical Characteristics cannot be verified; the procedure allows the use of Commercial Grade Surveys (Method 2) as a standalone dedication process; and there is no technical basis established for the use of sampling plans. The Corrective Actions to be taken in regards to CAR 13-41 are to revise WVC Procedure CP-E-18 for the following issues: Key definitions will be updated as provided in 10CFR Part 21; it will be made clear that all Critical Characteristics must be verifiable; will prohibit the use of Method 2 dedication as a standalone process; the technical basis for established sampling plans will be described; and both the Engineering and Quality Assurance staff will be trained on the changes to the procedure. WVC expects all of these Corrective Actions steps to be completed by 5/10/13.

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NON 99900746/2013-201-01 (cont)

CAR 13-43 was issued to address the following conditions; Several Dedication packages were reviewed during the inspection and it was identified that critical characteristics and acceptance criteria are not being appropriately identified in all cases. An extent of condition review is required. The Corrective Actions to be taken in regard to CAR 13-43 are as follows: The WVC Engineering Dept. will review all Dedication packages dating back to August 1, 2012; the methodology of defining critical characteristics and acceptance criteria will be addressed as part of CAR 13-41 and the revision of WVC procedure CP-E-18; and training will be completed as described in WVC CAR 13-41. WVC has completed a review of all Dedication Pages that did not have technical evaluations, no critical characteristics were missing except for the information required to tie it to a Commercial Grade Survey. WVC expects all of these Corrective Actions steps to be completed by 5/10/13.

NON 99900746/2013-201-02

This NON was issued in regards to 10CFR 50 Appendix B, Criterion V. During the course of the inspection, WVC issued CAR's 13-41, 13-48 and 13-53. After receipt of the NRC Inspection Report, WVC also issued CAR 13-62 to address Point #3 of this NON specifically.

CAR 13-41 was issued to address Point #1 of this NON in regards to the definitions in CP-E-18 not meeting the definitions as provided in 10CFR Part 21 for critical characteristics, commercial grade items or dedication. WVC Procedure CP-E-18 is in the process of being revised to address the key definitions and CAR 13-41 is described in detail under the response to NON 99900746-2013-201-01.

CAR 13-48 was issued to specifically address Point #2 of this NON, in which M&TE Calibration Records showed out-of-tolerance conditions as provided from the Calibration Supplier and these conditions were not reviewed and entered into the WVC Non-Conformance System (NCR). The Corrective Action steps which have been taken were to review each Calibration Record on hand for any gages currently being used and document any non-conforming conditions on an NCR. These evaluations have been completed at this time.

CAR 13-62 has been issued to specifically address Point #3 of this NON, in which pressure gages were not calibrated in accordance with Weir procedure CP-M-22, "Instructions for Calibration of Pressure Gauges with the Dead Weight Tester". WVC incorrectly summed the weight of the piston weight carrier on the dead weight tester which could cause a 10% error on a 10 psi gauge. The Corrective Actions steps that were taken are that WVC Engineering performed an evaluation to determine the impact of the false information listed on the Weight Chart and the effects this 1 psi error could have on products tested. The error was on the low pressure tester which would be conservative as low level leakage would increase with lower sealing pressures, therefore valves would have to have improved performance on testing using these gages. The Weight Chart has also been corrected to reflect the correct values to eliminate the 1 psi error currently being shown. WVC has completed all of these actions.



NON 99900746/2013-201-02 (cont.)

CAR 13-53 was issued to specifically address Point #4 of this NON, in which the QA Engineer failed to review and sign several test reports reviewed as required per Manual Rev. 7, dated 8/7/12, Section 11.0 "Test Control". The Corrective Action steps to be taken are for the QA Engineers perform an extent condition review of all completed test reports since August 1, 2012, to ensure that all test reports have been reviewed in accordance with the QA Manual requirements. An extent condition review has been completed and training has been provided to the QA Engineering staff and the ANI. All actions have been completed in regards to CAR 13-53.

NON 99900746/2013-201-03

This NON was issued in regards to 10CFR 50 Appendix B, Criterion VII and NRC Reg. Guide 1.28. A review of the WEC Design Spec. specifically invoked NRC Reg. Guide 1.28 which specifies that "the applicant or licensee should perform or arrange for annual evaluations of suppliers." Per WVC Procedure CP-Q-26 "Performance Assessment for Suppliers of Materials/Items", only Non-Accredited Material Organizations required the annual performance assessments/evaluations. During the course of the inspection, WVC issued CAR's 13-47 to address this issue. The Corrective Actions steps taken include: Procedure CP-Q-26 has been revised to include all Suppliers of safety related materials, items or services; the Approved Suppliers List has been updated to require all Suppliers except for commercial suppliers to have annual performance assessments; all performance assessments have been completed to date for the previously mentioned suppliers. At this time, WVC CAR 13-47 has been closed.

NON 99900746/2013-201-04

This NON was issued in regards to 10CFR 50 Appendix B, Criterion IX, in which WVC failed to establish controls to perform visual inspections of fillet welds and tack welds as required per ASME Section III, NC-4427. During the course of the Inspection, WVC issued CAR 13-46 to address this NON. The Corrective Action steps taken include: WVC Procedure CP-Q-38 "Performing Visual Inspections of Materials and Items" has been revised to include the inspection of fillet and tack welds in accordance with ASME Section III, NC-4427; training on this procedure revision and Code requirement has been completed with both the QC inspection staff and all WVC welding personnel. At this time, WVC CAR 13-46 has been closed.

NON 99900746/2013-201-05

This NON was issued in regards to 10CFR 50 Appendix B, Criterion XI, due to the fact that WVC Test Procedure 321-54536 stated that water quality must meet specified criteria for chloride ion, fluoride, conductivity and pH levels. Based upon this and the review of the latest water quality test results, these critical elements were not verified and the conductivity and pH levels were non-conforming. During the course of the Inspection, WVC issued CAR 13-52 to address this issue. The test results provided showed both the conditions of the water prior to adding rust preventative and the results including rust preventative. The conditions showed as being non-conforming only when the rust preventative was added. The Corrective Action steps to be taken are to install a "point of use" system for supply of deionized (DI) water to test stands for testing SST valves. This system will comprise of a portable tank and transfer pump with quick disconnects at the stand. Used water will be transferred to waste tanks for disposal. Portable tanks will be filled with DI water from a main generation system at the time of need and transferred to the test stand for use. A new water quality test will be performed using just the DI water to verify that it meets the requirements of the WEC Spec. An extent condition review will be performed to determine the impact of using the DI water with rust preventative on all of the WEC valves tested to date. WVC plans on completing these actions by May 10, 2013.



NON 99900746/2013-201-06

This NON was issued in regards to 10CFR Appendix B, Criterion XVI, due to the fact that several issues were identified in regards to Corrective Actions. During the course of the Inspection, WVC issued CAR's 13-49 and 13-51. After receiving the Inspection Report, WVC issued CAR 13-63.

CAR's 13-49 and 13-51 were issued to specifically address Point #1 of this NON. It was found during the course of the Inspection that the 2008 NRC Inspection identified issues, two of which had not been closed satisfactorily. CAR 13-49 was issued to address that WVC Procedure CP-E-20 (10CFR Part 21) did not accurately define the point of discovery required for 10CFR Part 21 evaluations. In 2009, it was agreed by both the NRC and WVC that procedure CP-E-20 would be revised to address this and that revision did not occur and a formal CAR was never issued.

CAR 13-51 was issued to address the fact C of C's received from a Supplier did not address all of the certifying requirements. While WVC issued CAR 09-01 and closed this CAR, the NRC requested that a larger extent condition review be performed which was agreed to by WVC. No evidence of this extent condition review could be found at the time of the 2013 Inspection.

CAR 12-36B is discussed in Point #2 of this NON and was opened to address an issue cited during the 2012 NUPIC Limited Scope Audit in which the dedication package for Kalsi Engineering did not include an adequate Technical Evaluation in accordance with NQA-1, 2008 Ed., 2009 Add, Subpart 2.14. As part of the response to CAR 12-36A, WVC agreed to revise procedure CP-E-18, "Control of Commercial Grade Items to be Dedicated for Use in Nuclear Safety-related Applications" to include the addition of Commercial Grade Services and Surveys, as well as providing a Technical Evaluation in accordance with the NQA-1 requirements. An extent condition review was performed for open orders but the extent condition did not include the root of the issue which was Kalsi Engineering. Before CAR 12-36B can be closed, the extent condition review needs to be completed including providing an adequate technical evaluation for Kalsi Engineering. WVC expects to have these actions completed by 5/30/13.

CAR 13-63 has been issued as a result of a review of the NRC Inspection Report to specifically address Point #3 of this NON. As written per CAR 13-63, WVC did not perform an extent condition review to evaluate how the inadequate dedication of calibration suppliers would affect M&TE being used on safety related items. The Corrective Actions to be taken for CAR 13-63 include: establishing critical characteristics and technical evaluations for the calibration suppliers and each of the family of M&TE; performing appropriate Commercial Grade Surveys of these calibration suppliers has been completed. An extent condition review to determine the impact of the M&TE used on previous orders is in-process. WVC expects to have these actions completed by 5/15/13.



Conclusion

In closing, Weir takes all of the Notice of Nonconformances very seriously and intends on completing the necessary corrective actions in order to prevent recurrence and to further improve and strengthen our Quality Program. We hope that the actions taken are considered to be satisfactory. We would like to thank the NRC Inspection team for their thorough and in-depth Inspection which provided WVC a better understanding of the expectations in meeting the requirements of 10CFR Part 21 and 10CFR 50 Appendix B.

A handwritten signature in black ink, appearing to read "Brian D. Sullivan", written over a horizontal line.

Brian D. Sullivan
Director, Quality Assurance
Weir Valves & Controls USA, Inc.