May 17, 2013

Mr. Vince Chermak, Quality Assurance Manager
Scientech
A Business Unit of Curtiss-Wright
Flow Control Company
200 S. Woodruff Avenue
Idaho Falls, ID 83401

SUBJECT: SCIENTECH RESPONSE TO NUCLEAR REGULATORY COMMISSION INSPECTION REPORT 99901320/2013-201 AND NOTICE OF NONCONFORMANCE

Dear Mr. Chermak:

Thank you for your May 1, 2013, letter in response to the Notice of Nonconformance (NON) that was discussed in the subject U.S. Nuclear Regulatory Commission (NRC) inspection report (IR). After carefully reviewing your response and after a subsequent phone conversation with us on May 15, 2013, to discuss your response, we believe the Nonconformance previously cited in the subject inspection report remains valid. The NRC inspection team issued the Nonconformance to Criterion XVI, "Corrective Action" of Appendix B to Title 10 of the Code of Federal Regulation (10 CFR) Part 50, "Domestic Licensing of Production and Utilization Facilities" for a failure to take adequate corrective actions to the condition adverse to quality documented in Scientech's Corrective Action Report (CAR) 09-007. The condition documented in the CAR concerned the basis for maintaining the seismic qualification of seismically sensitive items sold by Scientech as replacement parts, including relays. We disagree with the characterization in your response that states that the augmented testing program specified as a corrective action in the CAR was an enhancement to existing acceptable practices.

Criterion III, "Design Control," requires that "Measures shall also be established for the selection and review for suitability of application of materials, parts, equipment, and processes that are essential to the safety-related functions of the structures, systems and components." The NRC inspection team concluded that Scientech's past practices (as reviewed during the inspection and as outlined on page 4 to the attachment to your letter) were insufficient to establish similarity to previously tested and qualified devices. Scientech's past practices of purchasing components from qualified (but potentially un-audited commercial-grade suppliers), verifying part numbers, performing visual inspections, and performing basic functional testing were insufficient to detect design changes to a component's internals that may impact performance in a seismic environment.

For those relays previously supplied, your letter provides additional information regarding augmented seismic testing that was recently performed; however, it is not clear that this testing enveloped all the relays previously shipped to your customers. As discussed during our May 15, 2013 phone conversation, please provide a listing of all types of relays previously supplied, subsequent to actual qualification testing either as replacement parts or as part of a module, and your current basis for establishing similarity to previously qualified devices.

In regard to the proposed future actions, it was the NRC inspection team's understanding that your corrective actions would include seismic testing on a sampling basis of all relays to be supplied in the future; however, your May 1, 2013, letter states that testing of seismically sensitive components is "…a sampling program to generic criteria, not a qualification program." The intention of this wording is not clear. Please clarify what methods will be employed in the future to ensure that design changes have not been made to seismically sensitive components that would adversely affect their seismic performance

In accordance with 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."

Sincerely,

/RA/

Richard A. Rasmussen, Chief
Electrical Vendor Branch
Division of Construction Inspection
and Operational Programs
Office of New Reactors

Docket No.: 99901320

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