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United States Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Copy:
Chief, Construction Mechanical Vendor Branch
Division of Construction Inspection and Operational Programs
Office of New Reactors

Cives Steel Company
NRC Docket Number: 99901419

Subject: Clarification to Response to NRC Inspection Report No. 99901419/2012-201,
Notice of Violation, and Notice of Nonconformance

Reference: Letter from E. Roach (NRC) to G. Orff (Cives) NRC Inspection Report
No.99901419/2012-201, Notice of Violation, and Notice of
Nonconformance Dated September 5, 2013

Dear Mr. Roach:

In response to the above mentioned letter, Cives Steel Company, Southern Division (Cives) herewith provides the requested clarifications.

NRC Clarification Request:

We have reviewed your letter and found that it is not fully responsive to one of the NONs discussed in IR 99901419/2012-201. Specifically, your follow-up response to NON 99901419/2012-201-03 stated that in addition to the training of quality control personnel to the issues stated in the corrective actions initiated as a result of this NON, Cives will verify effectiveness of the corrective action by performing and documenting random surveillances. However, your response failed to provide a clear explanation or include what controls Cives will have in place and how they will be implemented to preclude repetition of similar findings to each of the examples documented in NON 99901419/2012-201-03. Please clarify your response to address these concerns.

Example

- (1) Cives failed to adequately implement its inspection program to inspect stud welds on embedment APP-12S02-CE-PW908 for Vogtle Electric Generating

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plant (Vogle), Unit 3, which connects to stairs in Auxiliary Building Area 1, Wall P, west face, at an elevation of 66 feet 6 inches. Cives failed to identify a stud that did not show a full 360-degree flash, as required by American Welding Society Code D1.1-2000, "Structural Welding Code-Steel," and Cives's SOP QA 05-01-5, "Stud Welding," Revision 2, dated December 10, 2011.

Cives Response:

Actions taken to preclude recurrence of this issue include the creation and implementation of an inspection traveler, Form 01-01-0, incorporated into procedure QP 01-01, Quality Planning. This traveler includes sign offs and dates by the Quality Control Inspector performing the visual inspection of welds to provide written documentation of the inspection. This traveler is in addition to the electronic record of inspection recorded by the QC Inspector and is specific to the inspections required for the project. Cives also took action to install additional lighting in the embed fabrication and inspection area to assist in the visual inspection activities.

Example

- (2) Cives placed two embedments in the "complete status ready for shipment." However, the tags did not contain required identification of the QC inspector who approved the completion of the final inspection as required by procedure QP 14-01.

Cives Response:

At the time the example noted above was observed, Cives QC would only initial the top corner of the bar code tag as a visual signifier that final inspection had been completed. Actions taken to preclude recurrence of the issue noted in the example was the creation of the inspection traveler, Form 01-01-0. This traveler requires sign offs and dates of inspections by Quality Control upon satisfactory verification of the required in-process inspections and travels with the item until final completion and preparation for shipment. After completion of all fabrication and inspection activities required in the traveler and prior to shipment, the traveler is removed and retained as a quality record by Quality Control as opposed to the original bar code tag which travels with the item to the customer.



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Example

- (3) Cives failed to perform and document in-process inspections before welding in accordance with the inspection fabrication plan for the Vogtle and Virgil C. Summer Nuclear Station (V.C. Summer) projects, as required by SOP QA 10-02-1 and SOP QA 10-03-2.

Cives Response:

Actions taken to preclude recurrence of the example noted above was the creation of the inspection traveler, Form 01-01-0 detailed in the previous responses to the examples which also documents applicable inspections required prior to welding through sign offs and dating by Cives QC. Cives also created and implemented a specific document, Form 10-02-2, In-Process Inspection Record, detailed in procedure QP 10-02, In-Process Inspection, used for documenting in-process inspections for items requiring additional fit-up inspections prior to welding as required by the inspection plan.

Example

- (4) Cives failed to test at least 1 out of every 100 studs welded by each operator as required by Westinghouse Specification APP-SS01-Z0-003, Revision 3, dated March 3, 2011, and the inspection plan entitled, "Inspection Fabrication Plan No. 5200-01 for Embeds, Items, and Anchor Bolts," Revision 1, dated December 14, 2011.

Cives Response:

Actions taken to preclude recurrence of the example noted above include the development and implementation of specific instructions titled, Work Instructions 10-03-1-01, Work Instructions for Westinghouse Specification APP-SS01-Z0-003 Section 4.3.2.6 for Nuclear Embeds. These instructions provide direction and requirements for performing and documenting by the Quality Control Inspector, the testing/bending of the first two studs welded in production and 1 out of 100 studs welded by each operator. These tests are documented on the final inspection records that are retained by Cives as quality records.

We hope the above responses are found to be helpful and if there are any other questions/issues please do not hesitate to contact the undersigned.



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Sincerely,
CIVES STEEL COMPANY
Southern Division



Lyn B. Busby
Quality Assurance Manager

cc: Greg Orff – Cives Steel Company