

September 20, 2013

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555-0001

Subject: Reply to Notice of Nonconformance's  
( 99901414/2013-201-01 & 99901414/2013-201-02 )

Reference: NRC Inspection Report No. 99901414/2013-201

Attachment: QualTech NP's reply to Notice of Nonconformance

QualTech NP Cincinnati Ohio hereby responds to the subject notice of nonconformance. This notice of nonconformance resulted from an NRC Team inspection conducted at our facility in Cincinnati Ohio from June 17<sup>th</sup> to 21<sup>st</sup> 2013.

Our response to the stated nonconformance with NRC requirements is provided in the attachment to this letter.

Please contact Kurt Mitchell 513-528-7900 if you wish to discuss this matter further.

Sincerely



Kurt Mitchell  
General Manager – Operations  
QualTech NP – A Business Unit of Curtiss Wright Flow Control Company  
4600 East Tech Drive  
Cincinnati Ohio 45245

Cc: Chief, Construction Electrical Vendor Branch, Division of Construction Inspection and Operational Programs, Office of New Reactors

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## QualTech NP Reply to Notice of Nonconformance

- D) Notice of Nonconformance ( 99901414/2013-201-01 )  
Documents the Nonconformance as Follows:

Criterion III, "Design Control," of Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, "Domestic Licensing of Production and Utilization Facilities," states, in part, 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."

QualTech's Dedication Plan# CGI-039, "Dedication Plan for BAL Seals, Inc., Rotary Flange Seals, Used In CB&I Airlocks," Revision 3, dated December 14, 2012, states, in part, that a critical characteristic shall be verified internally via Nitric Acid spot test to assure the rotary flange material is 300 stainless steel series and document the results in the inspection data sheet.

Contrary to the above, as of June 21, 2013, QualTech failed to perform a review for suitability of application of materials, parts, equipment and processes that are essential to the safety-related function of the structures, systems, and components as part of commercial grade dedication (CGD) of a BAL Seal rotary flange seal part number 0000045942. Specifically, QualTech did not perform a Nitric Acid spot test to assure the rotary flange material is 300 stainless steel series and document the results in the inspection data sheet as required by the CGD plan for the BAL Seal rotary flange seal.

This issue has been identified as Nonconformance 99901414/2013-201-01.

1) Reason for Non Conformance:

QualTech NP is in agreement with this NRC notice of nonconformance. QualTech NP believes that the required test was overlooked in our process for dedication.

2) Corrective Actions:

- a) One item from the same lot of material for the BAL Seal rotary flange seal part number 0000045942, that was identified in this notice of nonconformance, was taken from inventory and tested in accordance with the approved commercial grade dedication plan. The item was found to be acceptable in accordance with the dedication acceptance criteria therefore there was no impact on the item identified in the notice of nonconformance.
- b) Historical files were reviewed for extent of condition and no other occurrences of this nature were identified therefore QualTech NP considered this an isolated incident. QualTech NP considered this a matter of human error and oversight in the review of the dedication test data. No further action is required.

3) Preventive Actions

- a) The extent of condition for hardware impact was complete and the results indicate that this was an isolated case therefore no further preventative action is necessary as a result of this review.
- b) All personnel involved in the testing and review of this dedication process were made aware of this nonconformance and understand the human error that occurred. No further preventative actions are necessary.

4) Scheduled for Completion:

All actions for this notice of Nonconformance were completed on 8-20-2013 under QualTech NP's Corrective Action Program condition report # C13-264.

II) Notice of Nonconformance ( 99901414/2013-201-02 )

Documents the Nonconformance as Follows:

Criterion III, "Design Control," of Appendix B to 10 CFR Part 50 states, in part, "Measures shall be established to assure that applicable regulatory requirements and the design basis, as defined in § 50.2 and as specified in the license application, for those structures, systems, and components to which this appendix applies are correctly translated into specifications, drawings, procedures, and instructions."

QualTech's quality assurance (QA) manual, section 3.0, "Design control", step 3.2.1, states in part that, "when a client's procurement document is received, the document shall be processed to ensure that contract requirements and customer expectations are satisfied and contract requirements are correctly translated into drawings, specifications, instructions, and project documents."

Contrary to the above, as of June 21, 2013, QualTech did not properly translate contract requirements into procurement specifications and test procedures associated with the testing of certain safety-related components. Specifically, QualTech's test procedures that were included with QualTech's purchase orders (POs) to Green Mountain Electromagnetics (GME), did not explicitly state the proper International Electrotechnical Commission (IEC) standards and revisions to be used for electromagnetic compatibility.

1) Reason for Nonconformance:

QualTech NP is in agreement with this NRC notice of nonconformance. QualTech NP's practice was to use and implement the most current revision for standards utilized in EMI-RFI testing activities believing that the latest standard provided the latest best practices and methodology for testing. However, QualTech recognizes that a reconciliation of the customer specified revision of the standard verses the later revision of the standard is a more conservative approach and would ensure no adverse impact on test results.

2) Corrective Actions:

QualTech NP contracted with Green Mountain Electro-Magnetics to perform a review of the year /revision of the IEC & CISPR standards specified by EPRI TR-102323 and the

NRC Regulatory Guide 1.180 to the current year available, also to review revision/year of MIL-STD 461E Standards specified by EPRI TR-102323 and the NRC Regulatory Guide 1.180. Both reviews concluded that the use of the latest revision / year of the IEC CISPR and MIL-STD 461 were in compliance with the year /revision specified by EPRI TR-102323 and the NRC Regulatory Guide 1.180. The review also concluded that the technical changes in the documents improved the methodology and expanded the applicability of the standards. Emission levels and immunity levels are unchanged, therefore, there was no impact on any previous testing. Therefore in extent of condition beyond this review is not required.

3) Preventive Actions

a) QualTech NP completed the comparison review as indicated in #2 above and found no impact on testing or hardware based on that review. QualTech NP will make it a practice to specify the year/revision of the applicable standards in procurement documents to Green Mountain based on the specific year/revision required in the customer specifications or conduct a similar comparison review to reconcile any differences in the future.

4) Scheduled for Completion:

QualTech NP has completed the actions required under this notice of nonconformance and all actions were complete under the QualTech NP Corrective Action Program on Condition Report # C13-265 on 9-5-2013. No further actions required.