



September 6, 2013

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

Subject: Reply to NRC Inspection Report No. 99901420/2013-201, Notice of Violation and Notice of Nonconformance

References: NRC Notice of Nonconformance Docket Number 9901420/2013-201-02
NRC Notice of Nonconformance Docket Number 9901420/2013-201-03
NRC Notice of Nonconformance Docket Number 9901420/2013-201-07

Dresser Masoneilan (Dresser) hereby responds to the aforementioned Notice of Nonconformance. The Nonconformances were identified during the Nuclear Regulatory Commission's (NRC) inspection of the Dresser Masoneilan Avon, Massachusetts facility conducted March 4-8, 2013, by Inspectors Garrett Newman, Jonathan Ortega-Luciano, Aaron Armstrong, Paul Coco, Thomas Kendzia, Andrea Keim, and Tuan Le, and responded to May 22, 2013. This letter is in response to the questions raised by the NRC during their review of the Dresser response.

Dresser Masoneilan appreciates the opportunity that NRC Inspection provides us to continuously improve our Quality Process and Products we supply to the nuclear industry and to ensure we comply with NRC regulations.

Please contact me at 508/941-5430 if you have any questions or need to discuss this matter in greater detail.

Sincerely,

John A. Kerr
Nuclear Quality Manager
Dresser Masoneilan

Attachments

Cc: Chief, Construction Mechanical Vendor Branch, Division of Construction Inspection And Operational Programs, Office of New Reactors

A Sansi review has been completed JK

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Reply to NRC Notice of Violation
Docket Number 99901420/2013-201-02
NRC Inspection Report 2013-201

Your response to NON 99901420/2013-201-02, Example 2, stated that technical justifications for the engineering changes were supplied during the inspection. However, these justifications were informal at the time of the inspection and had not been processed through your quality assurance (QA) program. Please describe the results of your corrective actions taken to analyze the design changes and material substitution noted in the NRC inspection report and whether the extent of this condition was evaluated.

Dresser Response

The responses to NON 99901420/2013-201-02, Example 2 were processed under our QA program. The justifications became part of the original engineering change.

A technical evaluation was conducted on May 5, 2013. The evaluation concluded that the material substitution was suitable for the application.

Reply to NRC Notice of Nonconformance
Docket Number 99901420/2013-201-03
NRC Inspection Report 2013-201

Your response to NON 99901420/2013-201-03 described enhancements you made to your commercial grade dedication procedure NQSP 4.2. Please describe whether you conducted an extent of condition review and the results of the review.

Dresser Response

Masoneilan's dedication program was reviewed for methodology to ensure adequacy. All safety related instrumentation was reviewed. Updated dedications were generated using the enhanced format. We found no instances that dedication methods were not adequate. We reviewed our field issue reporting tools for conditions indicating premature failure due to potentially improperly dedicated parts and found no instances of concern. We reviewed Part 21 reporting on our products and found no issues pertaining to potentially improperly dedicated parts. As a result of our investigation we do not believe any issues exist on previously supplied equipment.



Reply to NRC Notice of Nonconformance
Docket Number 99901420/2013-201-07
NRC Inspection Report 2013-201

Your response to NON 99901420/2013-201-07 stated that means were provided to enter measuring and test equipment (M&TE) into the nonconformance system but did not discuss previously M&TE noted as out of calibration in the computer database. Please describe whether you conducted such an extent of condition review and the results.

Dresser Response

Masoneilan's calibration program was reviewed with consideration of any M&TE found to be out of tolerance to ensure that a broadness evaluation was conducted on a potential previously accepted product. M&TE used for acceptance of safety related product were not found to be in a nonconforming condition. We reviewed Part 21 reporting on our products and found no issues pertaining to potentially improperly accepted parts. As a result of our investigation we do not believe any issues exist on previously supplied equipment.