

November 4, 2013

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Subject: Reply to a Notice of Nonconformance NRC Inspection Report 99901429/2013-201

Dear Sir/Madam:

The U.S. Nuclear Regulatory Commission (NRC) conducted an inspection at the Schenectady, NY Argo Turboserve Corporation Nuclear- NY (ATC) facility from August 19-23, 2013. During the inspection, one Notice of Non-Conformance, Item Number 99901429/2013-201-01 was issued associated with Design Criterion III. The Non-Conformance States:

“ATC failed to apply appropriate design control measures to a material change when qualifying replicated Eberline IB4 interface boxes for harsh environment in accordance with Institute of Electrical and Electronics Engineers Standards 323-1974. Specifically, ATC used qualification by similarity analysis by comparing Qualification Report 2176, Eberline Instrument Company Nuclear Safety Related Radiation Monitoring Equipment Qualification Report, dated November 30, 1981, to the replicated boxes assembled by ATC. However, ATC failed to analyze if material changes made to the base and enclosure invalidate the qualification for the device by making it more susceptible to harsh environmental characteristics, therefore deteriorating its performance.”

Based on evaluation under the Corrective Action Program, ATC Nuclear agrees with the Non-Conformance and provides the following response:

- (1) ATC Nuclear determined through Root Cause Evaluation the underlying or root cause for the noncompliance was due to inadequate direction provided through the COP process involving design activities governed under ATC Nuclear Procedure QAP 4-002.
- (2) To address the specific occurrence, a more robust analysis was documented that satisfactorily analyzed the material and manufacturing differences for the IB4 Boxes designed by ATC-Nuclear in accordance with IEEE 323-1974 Section 6.5. This analysis concluded the material changes made to the design had no adverse impact on the qualification of the assembly as described in the Eberline Instrument Company Nuclear Safety Related Radiation Monitoring Equipment Qualification Report 2176, dated November 30, 1981. The analysis is available upon request.
- (3) In order to prevent recurrence ATC-Nuclear has revised the Customer Order Process identified in QAP 4-002 to cause the proper requirements and processing of design activities.

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(4) As of November 4, 2013, all actions have been implemented and are complete.

Please direct any additional inquiries to Mr. Thomas Woelfersheim, Quality Assurance Manager
ATC-Nuclear Schenectady, NY at twoelfersheim@argoturbo.com or (518) 612 8948.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Woelfersheim". The signature is fluid and cursive, with a large loop at the end.

Tom Woelfersheim
Quality Manager
ATC Nuclear.