

November 21, 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: Reply to NRC Notice of Violation
Docket Number 99901420/2013-201-02
NRC Inspection Report 2013-201

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 September 6, 2013. This letter is in response to the questions raised by the NRC during their review of the Dresser response.

The Notice of Nonconformance:

The Notice of Nonconformance provides the following description of Nonconformance -02

Dresser Masoneilan Quality Assurance Manual Section (QAMNUC) 4.0, "Design Control," Revision A, dated July 2010, Subsection 2.7, states, in part, that "Where changes to previously verified designs have been made, design verification shall be required for the changes, including evaluation of the effects of those changes on the overall design and on any design analyses upon which the design is based that are affected by the change to previously verified design."

Contrary to the above, as of March 8, 2013, Dresser Masoneilan failed to establish adequate design control measures for design changes commensurate with those applied to the original design and did not have approval by the organization that performed the original design. Specifically:

1. Dresser Masoneilan failed to provide objective documented evidence of design review and verification for technical changes for nuclear design revisions 0010317, 0009985, 0012208, 0013036, and 0012669, which changed machining details, lubricants, parts kits, and torque values for safety-related valves.
2. Dresser Masoneilan did not provide objective evidence of an engineering evaluation to provide justification for the change in material for lock nuts for a valve actuator housing. The original design requirements for the material specification required the part to be made of A307 carbon steel; Dresser Masoneilan fulfilled the purchase order with A194 carbon steel.



We have reviewed your letter and found that it is not fully responsive to one of the NONs discussed in IR 99901420/2013-201. Specifically, your follow-up response to NON 99901420/2013-201-02 stated that Dresser Masoneilan performed a technical evaluation on May 5, 2013, in response to the NON, and the conclusion of that evaluation was that the material substitution was suitable for the application. The letter states that this evaluation was performed under your quality assurance program and the technical evaluation was documented as part of the original engineering change. However, your response failed to provide a clear explanation of how Dresser Masoneilan concluded that similar deficiencies do not exist in other engineering changes. Also, the response did not include which controls Dresser Masoneilan will have put in place and how they will be implemented to preclude repetition of similar findings. Please clarify your response to address these concerns.

Dresser Response

Corrective Steps Taken and Results Achieved:

Since the NRC Inspection in March of 2013, Dresser Masoneilan has verified that the part number being quoted and supplied to the Customer are identical to that which was originally supplied. In the event that some attribute of the part has changed from that originally furnished, Dresser Masoneilan completes a technical evaluation that is furnished to the Customer for review and approval prior to proceeding with the order. This is implemented through the Dresser Masoneilan Engineering Change Order (ECO) process which would include attributes such as material, configuration or part number differences.

A review of current and past orders was conducted as part of the broadness evaluation and there was no evidence to determine that there were additional issues as described by the NRC Inspector.

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