



Reply to a Response to Disputed Notice of NonConformance

To: United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC. 20555-0001
Re: EA-2013-205
Report No. 99900067/2013-201

February 11, 2014

Subject: Nuclear Regulatory Commission Inspection Report No. 99900067/2013-201, Response to Disputed Notice of Nonconformance.

EA-2013-205

With respect to NRC letter Dated to BWC January 23, 2014.

- 1) **Reason for the nonconformance:** After review of the Bruck GmbH audit it was determined BWC failed to transfer Objective evidence from the audit notes to the final report. BWC has in the past contained the full audit checklist, audit report and audit notes in separate files, not always transferring the details to the final audit report. After review of the Audit report and the review of the Auditor notes, the following objective evidence was recorded at the time of the Audit and used when considering the Qualification of the Supplier

Manual reviewed: Quality Management Manual 02 Rev 01E Dated 08-20-2010, for such things as Organization, responsibilities, controls specified for test equipment, tools, and skills.

Indoctrination and Training: reviewed Auditor files, Shop Inspector Files and NDE files, personnel reviewed were Auditors, 3 names cited, Shop Inspectors 2 names cited, NDE 2 names cited.

Procedures, Instructions and Drawings: Reviewed Jobs 95992, 11684, 13216

Document Control: Reviewed Procedures VA-BE-1108, VA-QS-5107

Quality Assurance Records: Reviewed jobs 2063395, 2064301 and 20613001

Procurement Document Control: Reviewed Purchase orders 512776 and 510204

Incoming Inspection and receipt: jobs 13660, 13293 and 13335 were reviewed

Production Control General: Reviewed jobs 95992, 11684 and 13216 for things like traceability identification, transferring of identification, marking methodology, final markings of components to be shipped reviewed jobs 12918 and 81266

Inspection and Test: Job reviewed 11230, 13340 and 12904

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Control of Measuring and Test equipment: Reviewed equipment S/N 20018, 22217 and 00422, reviewed calibration of this equipment, calibration certificates, stickers dates etc.

Audits: Reviewed procedure F-BE-5004(Internal Audit procedure) F-QS-5307 (Supplier Audit procedure and schedule). Also reviewed internal audits: Hot forming area May 19, 2009, Lab Audit May 25, 2009, and Heat Treat Audit May 27, 2009

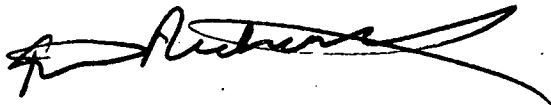
Certification of Material: Three CMTRs were reviewed: Cert 2066496 HT-93970 A350, 2066832 HT-93836 SA182 and 2066499 HT-223551 SA 350. These were reviewed to ensure that all the required areas were completed, also was any certifications from other organizations included, Actual results listed, listing of all weld repairs if performed, radiographic films if welding is performed Times and heat treatments performed.

All the Objective evidence was taken into account when writing the final report, but not necessarily included in the final report. This is BWC's error and was rectified February 2013 with a procedure revision and modified checklists requiring the inclusion of all of the objective evidence.

- 2) **The corrective steps that have been taken and the results achieved:** BWC will review all suppliers of pressure boundary material. Those suppliers that do not hold an ASME certification will have their audit reports reviewed to satisfy BWC that sufficient objective evidence was taken into account for these audits.

- 3) **The corrective steps that will be to avoid further noncompliance:** BWC will be using a newly created checklists for all audits of 10 CFR 50 Appendix B suppliers (including all audits non Appendix B as well). These checklists have been created to include within the body of the report to have the objective evidence listed and commented on. Once the audit is completed and the audit report with checklist is complete, these completed checklists will then reviewed and approved by 2 other Qualified individuals, thus ensuring all the requirements are met on the checklists.

- 4) **The date when the corrective action will be completed:** BWC has already implemented this process, in fact it was in effect while the Inspection by the NRC was in place, the case in hand was historical.



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