



**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

May 6, 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 March 31, 2014.

- 1) **Reason for the nonconformance:** After review of the Bruck GmbH audit it was determined BWC failed to prove that Bruck GmbH had an NCA 3800 Quality Program, and that the final report included findings to their ISO program as opposed to NCA 3800.
- 2) **The corrective steps that have been taken and the results achieved:** BWC has re-evaluated the Bruck Quality Manual 02 Rev 01E Dated 08-20-2010, and all of the objective evidence collected in the audit, and has verified that Bruck GmbH did in fact have a program that met the requirements of ASME NCA 3800 at the time.
- 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. 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 The Quality Program Manager Nuclear Equipment for completeness and adherence to the requirements of the BWC 10 CFR 50 Appendix B Quality Program.
- 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. The Bruck re-evaluation is complete and BWC is satisfied and confident that Bruck did meet the requirements of NCA 3800 at that time.

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