CAROLINA ENERGY
A Westinghouse Electric Company

WEC Carolina Energy Solutions
244 E. Mt. Gallant Road
Rock Hill, South Carolina 29730
USA

Date: 11/24/2014

Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

To: Ed Roach:

This letter provides requested clarifications and additional information regarding WEC Carolina Energy Solutions, LLC. (CES) response to the Nonconformance's documented by the NRC in Vendor Inspection Report No. 99901438/2014-201.

NRC provided this response dated September. 4, 2014

Nonconformances (NON) discussed in IR 99901438/2014-201.
Specifically, in your response to NON 99901438/2014-201-01 it was stated that Carolina Energy Solutions (CES) took corrective action to verify the chemical content of a penetrant testing (PT) material by testing and review of the chemical manufacturer's (Magnaflux) certificate of conformance (CFC). Qualification of commercial manufacturers is required for the purpose of verifying adequacy of quality controls. Further, qualification of commercial manufacturers must be established and maintained for acceptance of critical characteristics of safety related parts, materials, and services. Additionally, your response lacked documentary evidence of the chemical testing performed by Applied Technical Services (ATS).

Please describe how CES qualified the chemical manufacturer and also provide the ATS test results of the PT material. Please describe the acceptance criteria used to determine whether the test was satisfactory.

CES Response:
CES procures Liquid Penetrant NDE materials as commercial items meeting the requirements of the ASME for NDE materials. CES understands that NDE materials have requirements in ASME Section V, Nondestructive Examination, and ASME Section III, Rules for Construction of Nuclear Facility Components that must be met. To address these requirements, CES applies quality requirements to purchase orders to ensure documentation is provided by the manufacturer (Magnaflux) to meet the ASME requirements for the penetrant material consumables. CES performs a formal and documented receipt inspection to verify the documentation from the manufacturer provides confirmation that the supplied materials meet the ASME requirements and the requirements of the purchase order.

CES considers the following as the basis for use of the NDE materials as commercial grade:

1) Evidence that the chemical manufacturer (Magnaflux) has an audited process that confirms quality controls are in place.
2) The manufacturer has demonstrated by testing that the chemicals meet the ASME requirements
3) The materials have been used historically as an industry standard
4) The CES NDE procedures have been demonstrated and approved by the ANI utilizing the manufacturer's NDE materials
5) CES applies a formal receipt inspection within the QA process which verifies materials meet the ASME requirements and is documented as such on the manufacturer's Certificate of Certification.
6) CES has no knowledge of any OE where the NDE chemicals have had any detrimental effect on materials or components in the industry.
7) The ASME survey, the ANIS audits, the NUPIC audits to approve the CES QA Programs and Procedures have never identified any issue with the purchase of NDE materials nor questioned the use as a commercial grade product
8) CES has not had any formal requests in Purchase Orders from our customers identifying this as a requirement to provide NDE materials as Safety Related

Requested Response for ATS application to CES Approved Suppliers List

ATS (Applied Technical Services) was approved for use on Carolina Energy Solutions Approved Suppliers List as follows:

1) ATS is an approved, qualified supplier. ATS was approved as a CES Approved Supplier through the NIAC processes per the procedures within the CES QA Program. (NIAC Audit 19045, CES Audit V14-03)
2) The audit and audit team personnel were evaluated per the requirements defined in the CES QA Program.
3) CES maintains ATS as an approved supplier through vendor evaluations in accordance with the CES QA program.

The chemical testing performed by ATS was intended and verified to meet customer (Westinghouse) specification APP-GW-VLR-002 for non-product and prohibited materials on AP1000 components (which the chemical test report states). The Chemical Test Report is attached.

If you have any questions or would like to discuss this response, please call me at (847)-990-7525

Respectfully,

Charles Ginn
Manager, Quality Assurance
WEC Carolina Energy Solutions, LLC
244 E Mt. Gallant Rd., Rock Hill, SC. 29730
Phone: (847)-990-7525
Mobile: 847-656-6139
Email: ginncd@westinghouse.com

APPLIED TECHNICAL SERVICES, INCORPORATED

1049 Triad Court, Marietta, Georgia 30062 • (770) 423-1400 Fax (770) 424-6415

CHEMICAL TEST REPORT

Ref. C216269N **Date** May 28, 2014 **Page** 1 **of** 1

Customer: Carolina Energy Solutions, 244 E Mount Gallant Rd., Rock Hill, SC 29730-8993

Attention: Thomas Franchuk

Purchase Order #: 4500641116 Part #/Name: See Below (Wipe Samples)

Material Designation: Surface material contaminants obtained with wipe clothes

Special Requirement: Analyzed in accordance with ATS QA Manual, Rev. 11, dated 3/1/2014.

Lab Comment: Analyzed by ICP-atomic emission (ASTM E1479-99(2011)) and ion chromatography techniques (ASTM D4327-11).

Test Results

Composition: total micrograms (µg)

Identification	Cl^-	F^-	S	Zn	Hg	As	Pb
Alloy or Spec. Req.	(1)	(1)	(1)	(1)	(1)	(1)	(1)
Lot 8041, 100913 Control	3	<3	<10	<10	<2	<10	<2
Lot 8041, 100913, 4401705-01	25	<3	11	<10	<2	<10	<2
Lot 8041, 100913, 4401705-02	17	<3	<10	<10	<2	<10	<2

(1) None Supplied

ISO 9001

Prepared by: Kelly L. Lawson
Technician

Approved by: W. M. Katter
Senior Chemist

APPLIED TECHNICAL SERVICES, INCORPORATED

1949 Triad Court, Marietta, Georgia 30062 • (770) 423-1400 Fax (770) 424-6415

CHEMICAL TEST REPORT

Ref. C216269-1N **Date** May 28, 2014 **Page** 1 **of** 2

Customer: Carolina Energy Solutions, 244 E Mount Gallant Rd., Rock Hill, SC 29730-8993

Attention: Thomas Franchuk

Purchase Order #: 4500641116 Part #/Name: See Below (Magnaflux Chemicals)

Material Designation: Analyzed on a from can- liquid-weight basis

Special Requirement: Analyzed in accordance with ATS QA Manual, Rev. 11, dated 3/1/2014.

Lab Comment: Analyzed by ICP-atomic emission (ASTM E1479-99(2011)) and ion selective electrode chemistry (ASTM D1179-10). ASTM D808-11 and ASTM D129-13 used as prep guides.

Test Results

Composition: parts per million (mg/kg)

Identification	S	Cl	Br	I	F	Total Halogens
Alloy or Spec. Req.	(1)	(1)	—	—	(1)	—
Penetrant SKL SP2, 13E14K	9	<40	<8	<8	7	≤63
Penetrant SKL SP2, 12G13K	24	<40	<8	<8	11	≤67
Cleaner SKC-S, 13M01K	10	<38	<8	<8	8	≤62
Cleaner SKC-S, 13F01K	<8	<40	<8	<8	10	≤66
Developer SKD-S2 13D18K	<8	<40	<8	<8	14	≤70
Developer SKD-S2 13G07K	<8	<38	<8	<8	14	≤68

(1) Meets APP-GW-VLR-002, Reference 11 Chemical Requirements (Supplied)

ISO 9001

Prepared by: Kelly L. Lawson
Technician

Approved by: W. M. Katter
Senior Chemist

APPLIED TECHNICAL SERVICES, INCORPORATED

1049 Triad Court, Marietta, Georgia 30062 • (770) 423-1400 Fax (770) 424-6415

CHEMICAL TEST REPORT

Ref. C216269-1N **Date** May 28, 2014 **Page** 2 **of** 2

Customer: Carolina Energy Solutions, 244 E Mount Gallant Rd., Rock Hill, SC 29730-8993

Attention: Thomas Franchuk

Purchase Order #: 4500641116 Part #/Name: See Below (Magnaflux Chemicals)

Material Designation: Analyzed on a from can- liquid-weight basis

Special Requirement: Analyzed in accordance with ATS QA Manual, Rev. 11, dated 3/1/2014.

Lab Comment: Analyzed by ICP-atomic emission (ASTM E1479-99(2011)) and ion selective electrode chemistry (ASTM D1179-10). ASTM D808-11 and ASTM D129-13 used as prep guides.

Test Results

Composition: parts per million (mg/kg)

Identification	Zn	As	Pb	Bi	Cd	Sn	Sb	Hg	P	Cu
Alloy or Spec. Req.	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	—	—
Penetrant SKL SP2, 13E14K	<4	2	7	<4	<4	<4	<4	<1	7	42
Penetrant SKL SP2, 12G13K	4	2	<4	<4	<4	<4	<4	<1	10	63
Cleaner SKC-S, 13M01K	70	1	<4	<4	<4	<4	<4	<1	10	84
Cleaner SKC-S, 13F01K	5	1	<4	<4	<4	<4	<4	<1	8	73
Developer SKD-S2 13D18K	<4	<1	<4	<4	<4	<4	<4	<1	<4	5
Developer SKD-S2 13G07K	<4	<1	<4	<4	<4	<4	<4	<1	<4	<4

(1) Meets APP-GW-VLR-002, Reference 11 Chemical Requirements (Supplied)

ISO 9001

Prepared by: Kelly L. Lawson
Technician

Approved by: W. M. Katter
Senior Chemist