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Westinghouse Electric Company
Newington Operations
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U. S. Nuclear Regulatory Commission
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Your ref: 99901392/2014-201
Our ref: 15QS001 Rev 1*

January 22, 2015

SUBJECT: REPLY TO NOTICE OF NONCONFORMANCE cited in NRC INSPECTION
REPORT NO.: ~~0000~~1392/2014-201 dated December 8, 2014

9990

REFERENCE: (1) Lisa M. Plante Letter 14QS005 dated December 19, 2014 – Request for
Extension for the Westinghouse Electric Company LLC, Newington Facility
Reply to Notice of Nonconformance

Westinghouse received the NRC Inspection Report Number 99901392/2014-201 and the Notice of Nonconformance 99901392/2014-201-01 on December 10, 2014 and requested an extension in the due date of our reply via reference 1 dated December 19, 2014. Westinghouse views any notice of nonconformance as serious and is committed to be in compliance with the provisions of Title 10, the *Code of Federal Regulations* (CFR), Section 50, Appendix B “Quality Assurance for Nuclear Power Plants and Fuel Reprocessing Plants”.

Westinghouse values the results of the NRC’s inspection of our Newington Operations’ implementation of quality activities associated with the fabrication and inspection of control rod drive mechanisms (CRDM) and reactor vessel internals (RVI) for the Westinghouse AP1000 reactor design and is committed to ensuring that the issue identified below is corrected in a timely fashion.

Summary of Issue Identified (Refer to NRC Inspection Report 99901392/2014-201)

Criterion XVI, “Corrective Action,” in Appendix B, “Quality Assurance Program Criteria for Nuclear Power Plants and Fuel Reprocessing Plants,” to Title 10 of the Code of Federal Regulations (10CFR) Part 50, “Domestic Licensing of Production and Utilization Facilities,” states, in part that, “Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected.

Section 16, “Corrective Action,” of WEC Quality Assurance Manual, Revision 11, dated September 24, 2012 states, in part, that “The purpose of the corrective action program is to establish measures to ensure that conditions adverse to quality are promptly identified, documented, and reported to appropriate levels of management.”



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Section 7.6, "Timeliness Expectations," of WEC Newington Operations Procedure 16.2, "Westinghouse Corrective Action Program," Revision 7.0, dated March 31, 2014, provides the timeliness expectations for closing corrective actions opened in response to conditions adverse to quality. The issue closure date, for a Level 4 corrective action request, is 120 days from issue origination.

Contrary to the above, as of October 31, 2014, WEC Newington Operations failed to ensure that conditions adverse to quality were promptly identified and corrected. Specifically, in official correspondence with the NRC dated June 2, 2014, WEC Newington Operations stated that it had initiated Corrective Action Request (CAR) No. 17039, "Commercial Grade Dedication of Heat Treatment Services," on May 14, 2014, to address the inadequate commercial-grade dedication of the heat treatment services for the reactor vessel internals, such as the core barrel, the core shroud, and the instrumentation grid assembly, performed by Team Industrial Services, a commercial supplier. However, the NRC inspection team identified that CAR No. 17039 did not identify any proposed corrective actions to address the inadequate commercial-grade dedication of the heat treatment services and that no action has been taken by WEC Newington Operations to correct this issue, 168 days after CAR No. 17039 was initiated.

Response:

(1) The reason for the noncompliance:

Westinghouse accepts the Nonconformance and offers the following discussion regarding the circumstances which resulted in the Nonconformance.

The Issue Owner failed to make appropriate commitments to Corrective Action Request (CAR) No. 17039 and document the corrective action plan. The Issue Owner did not provide enough of a priority to the corrective actions and the importance of the timely documentation of those corrective actions.

(2) Corrective steps that have been taken and the result achieved:

The Issue Owner documented the corrective action plan for CAR No. 17039 which included the following:

1. Revision to PP-07-01, Dedication of Commercial Grade Items and Services – Revision 05 was completed and effective on December 15, 2014*. This revision included the implementation of a Standard Commercial Grade Dedication Evaluation CGDE-STD-TI-HT-001 Revision 00 for On-Site Heat Treatment Service for Team Industrial.
2. Extent of condition evaluation was performed to identify all safety related work performed by Team Industrial which included identifying all of the equipment used during the heat treatment operations performed and the Team Industrial technicians who were involved in the activity.



3. Commercial Grade Survey WES-2015-007 was performed on December 15, 2014 to assess the capabilities of Team Industrial in accordance with Commercial Grade Dedication Evaluation CGDE-STD-TI-HT-001, Revision 00. The equipment selection and personnel qualification verified during the survey were based on previous activities identified in the extent of condition evaluation. Team Industrial has been added to the Qualified Suppliers List for commercial grade on-site heat treatment services based on the results of the commercial grade survey.
4. All corrective measures associated with CAR 17039 have been completed and the item was closed on January 6, 2015.

Corrective Action Request 100058267 was initiated to address the Notice of Nonconformance 99901392/2014-201-01. The Issue Owner documented a corrective action plan which included the following:

1. Developed and implemented a performance improvement plan for CAPAL metrics which includes issue age and causal analysis timeliness.
2. Established monthly issue owner review meetings. Purpose of the meeting is to do the following:
 - Review past due issues to ensure issue closure is being actively managed and is on-track.
 - Review of issues to insure corrective action plans have been developed.
 - Review issues due during the current month to insure on-time closure.
 - Prioritize issue resolution.
3. Review and conduct training on CAR 100058267 and the NRC Inspection Report 99900404/2014-201 with the operations managers. Review shall include the following as a minimum:
 - Review and of the NRC Inspection Report 99900404/2014-201.
 - Importance of timely closure of CAPAL issues per WEC 16.2 requirements for "Timeliness Expectations".
 - Reinforcement to have a corrective action plan documented and entered into the system within 30 days of the CAPAL issue being created.
 - Review of WEC 16.2 "Westinghouse Corrective Action Program".
4. All corrective measures associated with CAR 100058267 have been completed and the item was closed on January 16, 2015.

(3) Date When Full Compliance Will Be Achieved:

All corrective measures associated with CAR 17039 have been completed and the item was closed on January 6, 2015. All corrective measures associated with CAR 100058267 have been completed and the item was closed on January 16, 2015.


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