



Fuel Handling Equipment & Crane Manufacturing  
Westinghouse Electric Company  
899 Highway 96 West  
Shoreview, Minnesota 55126 – USA

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**From:** Chad A. Hasychak  
**Date:** 15 May, 2015  
**Letter:** FHE&CM-QAL-15-020

**To:** Document Control Desk  
U S Nuclear Regulatory Commission  
Washington, DC 20852-2738

**Your Ref:** ~~---~~ **NRC Vendor Inspection Report Number 99901452/2014-201, Docket 99901452 / ML 15050A600**

**Subject:** **Reply to Westinghouse Fuel Handling Equipment and Crane Manufacturing Responses to the U.S. Nuclear Regulatory Commission Inspection Report Number 99901452/2014-201 Notice of Violation and Notice of Nonconformance – Request for Additional Information dated 16 March 2015, Docket 99901452 / ML 15050A600**

Please find attached our responses to Requests for Additional Information related to the notice of nonconformance and notice of violation issues from the October 20 through 24, 2014, Inspection 99901452/2014-201. If you need additional information or have any questions please contact Chad A. Hasychak at 724-953-5064 or hasychca@westinghouse.com.

Very truly yours,

A handwritten signature in black ink, appearing to read "Chad A. Hasychak", with a date "15 MAY 2015" written to the right of the signature.

Chad A. Hasychak  
Westinghouse Electric Company  
FHE&CM Quality Manager

IE09  
HRB

cc:	E. Roach	U.S. NRC
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	J. Gresham	Westinghouse
	R. Wessel	Westinghouse
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**NRC Question #1:**

*Your response to NOV 99901452/2014-201-01 states that "The 10 CFR Part 21 investigation was completed in accordance with WEC 21.0 by Westinghouse Regulatory Compliance. The investigation was completed on December 2, 2014, including an extent of condition for previous shipment, including spare parts. The conclusion of the investigation is the condition was found not to be reportable under 10 CFR Part 21." Please provide the justification for the conclusion that the condition was not reportable under 10 CFR Part 21.*

**Westinghouse Response:**

The issues identified with the Westinghouse FHE&CM commercial grade dedication (CGD) process affect crane hoists and hoist braking systems. The affected equipment ensures the ability to safely lift critical loads and prevent the uncontrolled lowering of this critical load.

Westinghouse evaluated each delivered component based on its critical design characteristics and dedication methods specific to that component. Each component was evaluated based on combinations, as applicable, of the following: equipment inspections, examinations of critical design characteristics, assembly fit-ups, inspections, FHE&CM vendor experience and load test results (such as factory acceptance testing and site acceptance testing). Based on the results of those evaluations FHE&CM concluded on December 2, 2014 that the identified components affected by the CGD-related deviations would remain capable of safely performing their intended safety functions or did not have a safety function to perform. Evaluations considered, where applicable, that factory acceptance testing had been performed to ensure that the fully assembled crane components functioned properly during a 125% load test and a 100% load performance test. For example, an evaluation of the hook located at the end of the wire rope used to lift the heavy load noted that the hook had been load tested at 200% of its required load. Additionally, the components were determined to have a robust structural design with design safety margins compliant with applicable NUREGs and industry standards such as CMAA 70. Based on these evaluations, Westinghouse concluded that had the delivered deviations been left uncorrected, the affected components could not have led to a substantial safety hazard. On this basis the discovered issues were deemed not to be reportable pursuant to 10 CFR Part 21.

Since the above evaluation, Westinghouse FHE&CM engineers re-reviewed commercial dedication instruction (CDI) documentation and identified new issues documented in CAPALs 100122351 and 100260880. Deviations were discovered on May 8, 2015 and Westinghouse is in the evaluation process. Because these evaluations are of a related nature, Westinghouse will complete the evaluations and notify the NRC, as needed, if the new evaluation results affect the conclusions of the prior Part 21 evaluation.

**NRC Question #2:**

*Your response to NON 99901452/2014-201-02 discusses several completed and planned corrective actions to address your overall Corrective Action Program. However, your response does not address the third example of NON99901452/2014-201-02. Please provide: 1) the corrective action taken or planned to address the issue of not performing commercial grade surveys and evaluations of dedicated items and 2) the significance at Westinghouse Fuel Handling Equipment and Crane Manufacturing.*

**Westinghouse Response:**

CAPAL 100000536 was generated on July 12, 2013 during a Westinghouse internal audit. On September 3, 2014, Westinghouse Fuel Handling Equipment and Crane Manufacturing (FHE&CM) issued a Stop Work order on the Commercial Dedication Process due to the determination that the current process did not meet WEC 7.2 Rev 3.0 "Dedication of Commercial Grade Items" and regulatory requirements. As part of the Stop Work, engineering reviewed and revised the entire Commercial Dedication Program including the requirements for each of the Commercial Dedication Instructions and the use of Method 2, Commercial Grade Surveys.

Westinghouse FHE&CM changed the current procurement strategy and placed purchase orders with vendors on the Westinghouse QSL for 10CFR50 Appendix B to reduce utilization of the commercial dedication process and commercial grade surveys as a primary method of procuring parts from a 10CFR50 Appendix B qualified supplier if possible. This reduced the number of required Commercial Grade Surveys due to the utilization of suppliers audited to the requirements of 10CFR50 Appendix B and 10CFR21.

The new Commercial Dedication Instructions generated by Westinghouse FHE&CM have been revised to meet WEC 7.2 requirements utilizing EPRI-5652 and now require that each critical characteristic for each Safety Related part to be verified using either Method 1, 2, or 3. Parts that require Method 2 to validate that certain characteristics have been met are identified within the CDI as needing a current Commercial Grade Survey in place at the time of the activity. This step must be signed off by quality before the inspection and dedication process for each part can be completed. These Commercial Grade Surveys are being performed when specified by the CDI as a necessary critical characteristic to commercially dedicate a component

An extent of condition was performed by conducting evaluations of previously commercially dedicated parts, completed as described in RAI response to question number 1. In regard to the CAPAL timeliness of this issue and the notice of nonconformance, a level 2 CAPAL 100066598 was generated. An apparent causal analysis was conducted that identified the necessary corrective actions detailed in Westinghouse FHE&CM's response letter on 22 January 2015.