

May 29, 2015

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

Ref: USNRC Inspection Report No. 71-0935/2015-201

Subject: Reply to the Notice of Violations

Pursuant to the provisions of 10 CFR 2.201 EnergySolutions submits the enclosed reply to the Notice of Violations resulting from the US Nuclear Regulatory Commission inspection performed March 24-26, 2015, at Petersen, Inc. located in Ogden, Utah. The inspections were related to the fabrication of the 3-60B transportation package.

Should you or members of your staff have questions concerning the content of this reply, please contact me.

Sincerely,



Richard L. Byars  
EnergySolutions  
ESH&Q Director  
Products & Technologies

Cc: Patricia Silva, Chief, Inspections, and Operations Branch, Division of Spent Fuel Management, Office of Nuclear Material Safety and Safeguards

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**REPLY TO NOTICE OF VIOLATION**

**Notice of Violation**

10 CFR 71.111, "Instructions, procedures, and drawings," states, in part, that the certificate holder shall prescribe activities affecting quality by documented instructions or procedures and shall require that these instructions or procedures be followed.

Contrary to the requirements of 10 CFR 71.111, the following instances were identified by the NRC where instructions or procedures for activities affecting quality were not followed:

- 1) Petersen did not perform an internal audit of the audit program on an annual basis as required by QCM-001, "Quality Control Manual," Revision 16, Step 18.3.1. Specifically, Petersen performed the last internal audit of the audit program in January 2014, but the annual internal audit of the audit program was not performed in December 2014 as planned due to the wrong audit checklist being used.
- 2) Petersen issued an internal audit report after 30 days from the date of completion of the audit, as required by procedure PI-SOP-18-1, "Internal Audit Procedure," Revision 8, Step 8.5. Specifically, an internal audit of the Production department was conducted on August 27, 2014 but the report was not issued until October 14, 2014.
- 3) Petersen failed to perform ultrasonic testing (UT) of the material to be used for two UT calibration blocks before fabrication of the calibration blocks began, as required by the approved UT nondestructive testing procedure, 100-UT-001, "General Ultrasonic Examination in Accordance with ASME Section V, Article 4 (Welds)," Revision 3, Step 6.6.5.

**EnergySolutions reply to Notice of Violation**

1. The reason for violation.
  - 1) Petersen uses two internal audit checklists. One for the Pocatello, Idaho facility and one for the Ogden, Utah facility. The Utah facility performs some corporate functions that the Pocatello facility does not. The functions that are unique to Ogden are excluded from the Pocatello checklist. Only the checklist for the Ogden facility addresses internal audits. The checklists didn't clearly reflect their intended applications adequately and the Lead Auditor used the wrong checklist.
  - 2) Oversight – A monthly Audits and Training meeting is held and status of audit reports is an agenda item for the meeting. However, status of the Production department audit was not addressed during the meeting.

- 3) Petersen, Inc. did not have a work instruction that delineated all the needed construction, testing and reporting requirements of ASME Section V.
2. The corrective steps that have been taken and the results achieved.
    - 1) The internal audit of the Ogden facility was reviewed to determine if any other areas were missing. No other areas were missed. An internal audit of the Quality Assurance Group was completed 4/8/15 using the checklist that had been prepared for the Utah Facility which includes the audit function. The results of the audit were acceptable with no findings.
    - 2) None – The audit report has been issued.
    - 3) The calibration block was UT examined to confirm that the material meets the original ASME Section V requirements for UT calibration blocks. It successfully passed this examination. This information was added to the certification records for the block.
  3. The corrective steps that will be taken to avoid further violations.
    - 1) The Pocatello checklist was eliminated.
    - 2) Audit report due dates are now scheduled in Microsoft Outlook when audits are scheduled. Reminders are now automatically sent out to the Director of Quality and the responsible Quality Engineer one week before audit reports are due. Additionally, the bullet marks on Audits and Training Meeting agenda have been replaced with check-boxes to assure that the status of audit reports is discussed during the meeting.
    - 3) Petersen Inc. developed a Standard Work Instruction, SWI-QC-38, to help review and identify projects that will require UT Testing to the different codes and block configurations.
  4. The date when full compliance will be achieved.
    - 1) Complete
    - 2) 7/17/15
    - 3) 7/17/15