

June 29, 2015

Robert Prigmore, Quality Director
Pentas Controls, LLC
20650 North 29th Place #106
Phoenix, AZ 85050

SUBJECT: PENTAS CONTROLS, LLC RESPONSE TO THE U.S. NUCLEAR
REGULATORY COMMISSION INSPECTION REPORT NO. 99901456/2015-201
NOTICE OF NONCOMPLIANCES

Dear Mr. Prigmore:

Thank you for your May 18, 2015, letter in response to the Notice of Nonconformance (NON) that was discussed in the subject U.S. Nuclear Regulatory Commission (NRC) inspection report (IR).

We reviewed your letter and found it is not fully responsive in addressing NONs 99901456/2015-201-01, 99901456/2015-20102 and 99901456/2015-20103. Specifically:

1. The response to NON 99901456/2015-201-01 discussed several completed and planned corrective actions but did not address the apparent Pentas Controls failures related to: 1) the disposition of the nonconformance reports (NCRs) cited in this NON and 2) the failure to initiate an NCR at the time the technician returned the defective Fluke meter to the logistics manager. Please describe the actions taken by Pentas Controls to disposition the NCRs cited in this NON, addressing the extent-of-condition determination. Please describe if any repairs or corrective action activities not resulting in Pentas Controls issuing an NCR or CAR due to those activities being documented in a travelers. Additionally, please explain why an NCR was not generated at the time the technician returned the defective Fluke meter. Please, describe the actions taken by Pentas Controls to address the noncompliance and describe the measures that will be put in place to preclude repetition.

As part of the proposed corrective action Pentas Controls established the Corrective Action Review Group, which will be performing activities affecting quality. Please describe the roles and responsibilities and frequency of these reviews and where Pentas Controls plans to document the process to be followed by the Corrective Action Review Group.

2. The response to NON 99901456/2015-201-02 is not fully responsive. The response did not clearly describe the reason for the noncompliance and the actions taken by Pentas Controls to correct these issues. Please clarify the actions taken by Pentas Controls to address the noncompliance and describe the measures that will be put in place to preclude repetition. Please describe the extent-of-condition review to determine if similar issues exist where CARs and NCRs have been open with no actions taken, for an extended period of time, e.g. greater than 10 months.
3. The response to NON 99901456/2015-201-03 is not fully responsive. Please explain the reason(s) why Pentas Controls failed to perform an adequate commercial grade dedication of an NLI 913189-A Firing Board with Terminal strip. Also, clarify the actions taken by Pentas Controls to address the noncompliance and describe the measures that will be put in place to preclude repetition. Additionally, please describe the extent-of-condition review to determine if similar issues exist in other Equivalency Evaluation documents, i.e. used for commercial grade dedication.

Please provide a written explanation or statement within 30 days of this letter in accordance with the instructions specified in the enclosed NON of inspection report No. 99901456/2015-201. The agency will consider extending the response time if you show good cause for us to do so.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390 "Public Inspections, Exemptions, Requests for Withholding," of the NRC's "Rules of Practice," a copy of this letter, its enclosure(s), and your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System, accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request that such material is withheld from public disclosure, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21 "Protection of Safeguards Information: Performance Requirements."

R. Prigmore

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Please contact Mr. Jonathan Ortega-Luciano at 301-415-1159, or via electronic mail at Jonathan.Ortega-Luciano@nrc.gov, if you have any questions or need assistance regarding this matter.

Sincerely,

/RA/

Edward H. Roach, Chief
Mechanical Vendor Inspection Branch
Division of Construction Inspection
and Operational Programs
Office of New Reactors

Docket No.: 99901456

R. Prigmore

- 3 -

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Docket No.: 99901456

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NAME	JOrtega-Luciano	ERoach
DATE	6/26/2015	6/29/2015

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