



U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555-0001
Attn: Richard Rasmussen

August 7, 2015

Subj: Reply to a Notice of Nonconformance – Docket No. 99901423, Report No. 2015-021

In accordance with the above subject notice, ABB provides the following reply to your Notification dated July 9, 2015.

Per the NRC report the following non-conformances were noted:

- A. "ABB's governing procedures did not require the documentation of any receipt inspection data."
 - a. The reason for the noncompliance
 - i. ABB has been completing inspections and verifying parts meet the documented instructions, procedures and drawings and documenting the results as "pass" or "fail." This process ensures the acceptance of the parts but fails to document specific results from the inspection.
 - b. The corrective steps that have been taken and the results achieved
 - i. ABB amend the inspection process for parts and assemblies that may be used in safety related product. This includes the assurance of the use of proper documentation, identification of criteria to be inspected and the proper recording of results of the inspection in the ABB enterprise software system.
 - c. The corrective steps that will be taken to avoid non-compliances;
 - i. ABB continues to perform dedication procedures on all safety related product to ensure the safety related functions can be performed.
 - d. The date when your corrective action will be completed.
 - i. The process for improved inspection and results documentation is planned to be in place by Sept 30, 2015. Following that date, all components and assemblies will be processed according to the newly implemented procedures. The time will be utilized to train affected personnel and validate the capability of the process and data retention to meet the requirements.

- B. "... the tools being utilized by ABB to perform receipt inspection of pins utilized in mechanisms for safety-related relays were not appropriate to ensure that the material conformed to the procurement documents. The tools did not possess the sufficient accuracy or resolution to ensure the material met its purchase requirements. In addition the visual examinations being performed of the pins were not sufficient to verify conformance with the applicable drawings."
 - a. The reason for the noncompliance
 - i. Inattention to detail, improper application of training, and failure to comply with written procedures. Because the inspection took place in 2012, it is unknown if other factors were causal to this deficiency.

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- b. The corrective steps that have been taken and the results achieved
 - i. In addition to the new process to be established, Inspectors have been informed of these specific findings and proper action that was necessary to carry out the inspection.
- c. The corrective steps that will be taken to avoid non-compliances;
 - i. The Quality department will schedule internal audits of the Inspection process to verify the effectiveness of the new procedures and proper inspection practices by the technicians.
- d. The date when your corrective action will be completed.
 - i. Three audits, minimum, will be performed over 1 calendar year beginning in October 2015. Further audits will be scheduled if results are not favorable.

Sincerely,

Bryan Tauzer
Quality Manager
ABB Distribution Automation

CC (electronic):

Richard Rasmussen, Chief
Electrical Vendor Inspection Branch
Division of Construction Inspection and Operational Programs
Office of New Reactors

Jeffrey Jacobson, Inspection Team Leader
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