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Nova Machine Products

US Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555-0001

Date: February 2, 2016

**SUBJECT: INTERIM 10 CFR PART 21 REPORT REGARDING
QUALIFICATION/VERIFICATION TESTING OF REVERSED ENGINEERED (HCU)
ACCUMULATORS USED IN THE CONTROL ROD DRIVE SYSTEM OF BOILING
WATER REACTORS.**

The attachment to this letter provides an interim report in accordance with 10 CFR 21.21(a)(2) pertaining to Nova's failure to establish adequate design control measures to verify and check adequacy of the Reversed Engineered HCU accumulators used in control rod drive systems of boiling water reactors. This also serves as a follow-up to the NRC Notice of Non Nonconformance 9990105/2015-201-02 identified during the recent Vendor Inspection of Nova.

Evaluation of reportability in accordance with 10 CFR Part 21 is not able to be completed within the sixty (60) day evaluation period due to the need for additional time to conduct the necessary engineering calculations along with functional qualification testing. It is currently expected that the evaluation of these conditions will be completed by April 30th, 2016.

If there are any questions pertaining to this communication, please contact Tad Gray, General Manager, at 216-898-8374 or Frank Furfari, Quality Assurance Manager at 216-898-8394.

Yours sincerely,

Tad Gray
General Manager – Nova & AP Services

Attachment 1: Interim Report

IEZO
NRD

(i) ***Name and address of the individual or individuals informing the Commission.***

Tad Gray
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(ii) ***Nature of the defect or failure to comply and the safety hazard which is created or could be created by such defect or failure to comply.***

Nova did not establish adequate design control measures to verify and check adequacy of the Reversed Engineered HCU accumulators used in control rod drive systems of boiling water reactors. This deviation potentially could create a SSH by not allowing the accumulator to perform its intended safety function under certain conditions.

During the recent NRC inspection of Nova performed 12/4/2015, it was determined that HCU accumulators using the reverse engineering EPRI guidelines process had not been fully qualified per Criterion III, "Design Control" of Appendix B. This was identified as Nonconformance 9990105/2015-201-02.

(iii) ***The date on which the information of such defect or failure to comply was obtained.***
December 4th, 2016

(iv) ***The corrective action which has been, is being, or will be taken; the name of the individual or organization responsible for the action; and the length of time that has been or will be taken to complete the action.***

The corrective action associated with this verification testing has been entered into the Nova Corrective Action system as CAR # 279. Nova Machine has initiated Design Verification testing to be performed on the HCU accumulators to assure that design input/output requirements have been met. This is being accomplished through alternate calculations, and qualification testing to demonstrate design performance against design input requirements. Completion is targeted for April 30th, 2016.