

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

Date: February 12, 2016

**SUBJECT: REPLY TO A NOTICE OF VIOLATION** Nuclear Regulatory Commission inspection report of Nova Machine Products No. 99901052/2015-201 Notice of Violation. U.S. Nuclear Regulatory Commission (NRC) inspection conducted at Nova Machine Products (Nova), November 30<sup>th</sup> through December 4<sup>th</sup>, 2015

The following provides the milestones and status associated with the Notice of Violation in the report by the Nuclear Regulatory Commission noted above:

***REPLY TO A NOTICE OF VIOLATION 99901052/2015-201-01***

• **REASON FOR VIOLATION:**

When evaluating the nonconforming condition for resolution, Nova did not include within that evaluation a documented formal Part 21 Evaluation. Although not specifically labeled as such, a Part 21 Evaluation was in fact conducted by Nova in conjunction with the affected Licensee. The Nova Part 21 screening process associated with the corrective action generated at that time, however, did not clearly, concisely, and comprehensively capture the rationale associated with the evaluation aspects as described in Nova procedure 8.3.1 Rev 10.

The Nova 10 CFR Part 21 evaluation process (as part of the Corrective Action) was not robust.

• **CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED**

Steps taken as a result of the NRC Notice of Violation:

- The corrective action associated with this violation has been entered into the Nova Corrective Action system as CAR # 281.
- As a result of the CAR #281, the Nova 10 CFR Part 21 program was enhanced to include additional screening questions at both the Corrective Action and Non-conforming report levels. Existing screening questions associated with the Nova Corrective Action/Nonconforming Process were revised and enhanced to include definitive channeling and applicability of Part 21 evaluation and Part 21 reportability. This will now include clearly documented rationale and written justifications for Part 21

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evaluation and reportability. This includes any documented Part 21 engagement with Nova's customer as well.

- Training in the use of the newly revised series of screening questions was held with all Nova personnel associated with both the Nonconforming and Corrective Action processes on February 3, 2016.
- A review of all Corrective Actions issued in the past 3 years, since January 2013, was performed applying the revised screening process. No part 21 applicability issues were identified.
- Nova has contacted Fermi and engaged in conversations regarding the accumulators. Fermi had also engaged in a corrective action on the 2 accumulators in question and further enhanced their FME process as a result. Again, it was discussed in detail that the accumulators in question at no point failed to perform their safety function and performed as they should in the SCRAM process.
- Nova has processed the Fermi event through the enhanced evaluation process which now includes very specific Part 21 screening questions. The results of the Nova evaluation as discussed with Fermi, concluded that the deficiency did not establish a defect that could cause a substantial safety hazard or a condition that could contribute to the exceeding of a safety limit. There was no degradation of any of the accumulator items that would cause a failure in the accumulator's intended safety function. For this reason the Evaluation concluded this event was not a Part 21 reportable condition. Records in support of the Evaluation have been archived in accordance with the regulation for the 5 year period.

- CORRECTIVE STEPS THAT WILL BE TAKEN


- No additional steps required.

- DATE FULL COMPLIANCE WILL BE ACHIEVED

- With this letter dated February 12, 2016

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

Sincerely,



Tad Gray  
General Manager – Nova & AP Services