

March 8, 2016

Mr. Tad Gray, General Manager
Nova Machine Products Company
18001 Sheldon Road
Middleburg Heights, OH 44130

SUBJECT: NOVA MACHINE PRODUCTS COMPANY RESPONSE TO THE U.S.
NUCLEAR REGULATORY COMMISSION INSPECTION REPORT
NO. 99901052/2015-201, NOTICE OF VIOLATION AND NOTICE OF
NONCONFORMANCE

Dear Mr. Gray:

Thank you for your February 12, 2016, letters in response to the Notice of Violation (NOV) and Notice of Nonconformance (NON) that were discussed in the subject U.S. Nuclear Regulatory Commission (NRC) inspection report (IR).

We have reviewed your letters and found them to be responsive to the NOV and NONs documented in IR 99901052/2015-201. However, as a point of clarification, in your response to NON 99901052/2015-201-02, you indicated in your Reason for Noncompliance that the manufacturing of the replacement hydraulic control unit (HCU) accumulators is not considered a new design, but rather a "reverse-engineered equivalent (duplicate or like-for-like) item." Please be aware that the NRC does not recognize the terms "reverse-engineered equivalent," or "duplicate" items. Please review NRC Inspection Procedure 43004, Inspection of Commercial-Grade Dedication Programs, dated November 29, 2013, for NRC guidance on "like-for-like" replacements and guidance on equivalency evaluations. Additionally, you may also refer to Electric Power Research Institute (EPRI) guidance on the like-for-like and alternative replacement items, contained in EPRI 3002002982, "Plant Engineering: Guideline for the Acceptance of Commercial-Grade Items in Nuclear Safety-Related Applications, Revision 1 to EPRI NP-5652 and TR-102260," dated September 2014.

We have no further questions or comments at this time and may review the implementation of your corrective actions during a future NRC staff inspection to determine whether full compliance has been achieved and maintained. No additional response to the NOV and NONs is required.

T. Gray

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Please contact Mr. Jermaine Heath at 301-415-6066, or via electronic mail at Jermaine.Heath@nrc.gov, if you have any questions or need assistance regarding this matter.

Sincerely,

/RA/

Richard P. McIntyre, Acting Chief
Quality Vendor Inspection Branch-2
Division of Construction Inspection
and Operational Programs
Office of New Reactors

Docket No.: 99901052

T. Gray

- 2 -

Please contact Mr. Jermaine Heath at 301-415-6066, or via electronic mail at Jermaine.Heath@nrc.gov, if you have any questions or need assistance regarding this matter.

Sincerely,

/RA/

Richard P. McIntyre, Acting Chief
Quality Vendor Inspection Branch-2
Division of Construction Inspection
and Operational Programs
Office of New Reactors

Docket No.: 99901052

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