



December 9, 2016  
NRC/QA-4765

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

**Subject:** Docket No. 99901473; General Atomics' Electromagnetic Systems Group **Reply to a Notice of Nonconformance**; Request for Extension of Time to Respond.

**Reference:** NUCLEAR REGULATORY COMMISSION INSPECTION REPORT NO. 99901473/2016-201 AND NOTICE OF NONCONFORMANCE; Dated November 29, 2016.

Dear Ms. Kavanagh:

General Atomics (GA) is in receipt of the referenced inspection report and Notice of Nonconformance. GA takes notices of nonconformance very seriously and wants to reply in a timely manner, but also wants to take the time necessary to research the findings, develop appropriate corrective actions, and provide a comprehensive and well-considered response that addresses the issues and conveys the scope of actions that have been, and will be, taken to improve GA's compliance with its QA program, NRC requirements, and the requirements of our customers.

Please note that following the NRC exit meetings (on September 16 and on October 19, 2016) GA immediately commenced activities to investigate, evaluate, discuss, revise, and improve its policies and procedures as appropriate. And, while much work has been done, after reviewing the details in the referenced nonconformance report and after considering the resources and time needed to properly address them, and for the reasons given below, GA respectfully requests a 30 day extension of time within which to respond.

The following circumstances contributed to our need to request an extension:

- 1.) The nature of the nonconformances demand an in-depth evaluation and plan for explanation and corrective action.
- 2.) One of GA's key Engineers (and subject matter experts) has been unavoidably out of the office for the last month. This person just returned to the office on December 8, 2016. He will have a lead responsibility in the evaluation and identification of appropriate corrective measures and improvements (especially with regard to proper calibration of RMS detectors).
- 3.) The Notice of Nonconformance was dated November 29, 2016 with a reply deadline of December 29, 2016. It is to be noted that GA essentially shuts down for the holidays during the last week of each year. This year, December 26 and 27 are GA holidays and December 28, 29 and 30, are "optional workdays." Thus, GA would need to reply by December 23; just two weeks from now. A comprehensive well-reasoned reply warrants more time to prepare.

Accordingly, GA hereby respectfully requests a 30 day extension to time within which to reply. With NRC approval, GA's reply will be due by January 28, 2016. GA looks forward to a favorable response and thanks you in advance for your consideration of our request.

If you should have any questions regarding this submittal, please do not hesitate to contact me at (858) 455-2823 or at [keith.asmussen@gat.com](mailto:keith.asmussen@gat.com).

Very truly yours,

Keith E. Asmussen, Ph.D., Director  
Licensing, Safety and Nuclear Compliance

cc: Ms. Kerri Kavanagh, Chief, Quality Assurance Vendor Inspection Branch-3 Division of Construction Inspection and Operational Programs, Office of New Reactors.

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