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May 22, 2017

U.S. Nuclear Regulatory Commissions
Attn: Document Control Desk
Washington, DC 20555-0001

Cc: Chief, Quality Assurance Vendor Inspection Branch-2
Division of Construction Inspection and Operational Programs,
Office of New Reactors

Subject: Reply to a Notice of Violation

Reference: Nuclear Regulatory Commission Inspection Report No. 99900060/2017-202-01

Enclosed please find the Curtiss-Wright Flow Control Company, Target Rock Division reply to A Nonconformance 99900060/2017-202-01. This response is documented on the enclosed Target Rock (TR) internal Corrective Action Report No.17-039.

Please contact me if you have any questions or require any additional information.

Sincerely,

John DeBonis
TR Quality Assurance Manager
jdebonis@curtisswright.com
6313964429

Enclosure:

TR Corrective Action Report CAR 17-039

IED09
NRD

**TARGET ROCK
CORRECTIVE ACTION REQUEST**

CAR NO.: 17-039

these TR suppliers and is very knowledgeable of each of the supplier's processes and controls. TR's lead auditor did witness supplier activities to verifying conformance to technical requirements imposed and compliance with the methods utilized by the supplier to perform tests and or inspections, as required by the TR PRS.

- Therefore, the format and content of the CG survey records / checklists (which were titled as "Audit Reports") did not provide the specific requirements for documenting the objective evidence reviewed. The checklist did not stress CG survey performance, but rather program audit performance.

Root Cause Corrective Action

Corrective steps that will be taken to avoid noncompliances and date when corrective action will be completed:

- Engineering will review each CCAV sheet Method 2 critical characteristic. This review shall ensure each critical characteristic is related to the safety function of the item, is aligned with a specific attribute(s) requiring verification, and clearly identifies the method for verification. All CCAV sheets will be reviewed by a second engineer to ensure all the item's critical characteristics are now identified on the CCAV sheet. All Method 2 CCAV sheets will be reviewed and revised by 8/31/17.
- Quality Assurance will revise the commercial grade survey plans to include checklists based on the revised Method 2 characteristics / verification methods identified on the CCAV sheets. The revised checklists shall emphasize the identification and documentation of the objective evidence reviewed and will emphasize survey performance (in lieu of program audit performance). This action will be completed by 9/15/17.

Other Hardware / Product Affected

Problem Report Required Yes ___ No X

No hardware or product was specifically affected by the finding identified. The previous surveys performed along with the verifications of PRS technical requirements and methods to perform tests and or inspections, the performance of quality program audits, and the military oversight conducted provide reasonable assurance that related items or services will perform the intended safety functions. The revised critical characteristics, methods of verification and survey checklists will be implemented for all future TR Method 2 CG supplier surveys.

Response Provided by: J. Smith 5/22/17
J. DeBour's 5/22/17
Date

QA Manager Approval: A. D. Maw 5/22/2017
Date