

July 10, 2017

Mr. James M. Rossignol
Quality Assurance Manager
Chicago Bridge & Iron
366 Old Airport Road
Laurens, SC 29360

SUBJECT: CHICAGO BRIDGE & IRON'S RESPONSE TO THE U.S. NUCLEAR
REGULATORY COMMISSION INSPECTION REPORT
NO. 99901432/2017-201, NOTICE OF VIOLATION, AND NOTICE OF
NONCONFORMANCE

Dear Mr. Rossignol:

Thank you for your April 21, 2017, May 30, 2017, and June 27, 2017, letters in response to the Notice of Violation and Notice of Nonconformances (NONs) that were discussed in the subject U.S. Nuclear Regulatory Commission (NRC) inspection report (IR).

We have reviewed your letters and found that they are not fully responsive to NONs 99901432/2017-201-05, 99901432/2017-201-08, and Unresolved Item 99901432/2017-201-07. Specifically:

1. Your response to NON 99901432/2017-201-05 failed to address several areas of concern to the NRC staff. Clarify your response as follows:
 - a. The response states, in part, that "The procedure and Job Instructions (JI) only address capping prior to shipping after final cleaning inspection was performed." As stated in the inspection report, the piping spools that were in question included valves that have inaccessible areas that cannot be final cleaned without total disassembly, and therefore are to be maintained clean throughout the entire processing of the piping spool and not just after final cleaning. Describe in sufficient detail the corrective actions being taken for these piping spools with inaccessible areas that cannot be final cleaned, but are to be maintained cleaned throughout the fabrication of the piping spool.
 - b. The response states, in part, that "The procedure and Job Instructions (JI) only addressed capping prior to shipping after final cleaning inspection was performed. Immediate training of cleaning/coating personnel and QC also performed to new requirements and to ensure that they are aware that capping is to be established and maintained immediately after final cleaning." Clarify whether the procedures were revised to also require valves or other components with inaccessible areas to be maintained cleaned throughout the entire processing of the piping spool and not just after final cleaning and that the personnel are trained concerning this requirement.

- c. The response does not provide the extent of condition for all the piping spools that have shipped or in process of being shipped. Therefore, provide the extent of condition for the piping spools that this cleanliness requirement was not performed since it was not specified in the procedure (cleanliness capping was only performed prior to shipping the piping spools in lieu of maintaining cleanliness after final cleaning and maintaining cleanliness throughout the entire process for piping spools with inaccessible areas).
2. Your response to NON 99901432/2017-201-08 failed to address several areas of concern to the NRC staff. Clarify your response as follows:
 - a. Your response states, in part, that “calibration services being used by the two noted suppliers will be procured by CB&I Laurens through the use of qualified suppliers to ensure that the proper flow down of safety related requirements is achieved.” However, your response failed to address the work already completed by these two suppliers. Provide the extent of condition performed to evaluate the calibration services already completed by these two suppliers.
 3. Your response to Unresolved Issue 99901432/2017-201-07 failed to address several areas of concern to the NRC staff. Clarify your response as follows:
 - a. The response states, in part, that “CB&I Laurens opened CAR-2017-029 to document any issues in regards to previously closed corrective action (C/PAR) 570.” The response did not provide any useful information for the NRC staff to verify the adequacy of the extent of condition. As stated in the inspection report, the NRC staff needs more information to determine if a nonconformance has occurred. Provide the following information:
 - i. The extent of condition specified in C/PAR No. 570 as a result of NON 99901432/2015-201-02 issued in the NRC inspection report No. 99901432/2015-201, dated May 22, 2015. Your response should include any objective evidence associated with the extent of condition.
 - ii. Full evaluation of the corrective steps that have been taken and the results achieved;
 - iii. Full evaluation of the corrective steps that will be taken to avoid further noncompliance; and;
 - iv. The date when the corrective action will be completed.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390 “Public Inspections, Exemptions, Requests for Withholding,” of the NRC's "Rules of Practice," a copy of this letter, its enclosure(s), and your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System, accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request that such material is withheld from public

disclosure, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21 "Protection of Safeguards Information: Performance Requirements."

Please contact Mr. Yamir Diaz-Castillo at 301-415-2228, or via electronic mail at Yamir.Diaz-Castillo@nrc.gov, if you have any questions or need assistance regarding this matter.

Sincerely,

/RA/

John P. Burke, Chief
Quality Assurance Vendor Inspection Branch-2
Division of Construction Inspection
and Operational Programs
Office of New Reactors

Docket No.: 99901432

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Dated: July 10, 2017

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