

September 15, 2017

Mr. Stewart Shannon
Senior Director, Product Assurance
Curtiss-Wright Electro-Mechanical Division
1000 Wright Way
Cheswick, PA 15024

SUBJECT: CURTISS-WRIGHT ELECTRO-MECHANICAL DIVISION'S RESPONSE TO
THE U.S. NUCLEAR REGULATORY COMMISSION INSPECTION REPORT
99901383/2016-201, AND NOTICE OF NONCONFORMANCE

Dear Mr. Shannon:

Thank you for your letter dated August 30, 2017, in response to the Notice of Nonconformances (NONs) that were discussed in the subject U.S. Nuclear Regulatory Commission (NRC) inspection report.

We have reviewed your letter and found that it is still not fully responsive to NONs 99901383/2016-201-01 and 99901383/2016-201-02. Specifically:

1. Your response to NON 99901383/2016-201-01 failed to address an area of concern to the NRC staff. Specifically, the response to NRC Comment 1.c states, in part, that "The completed engineering evaluation and justification as a basis for the engineering design, and to comply with the requirements of Section 4.2.5 of Westinghouse supplemental specification APP-GW-VLR-010 Rev.1, was submitted to Westinghouse for engineering and quality approval on May 23, 2017, via EMO letter EMD-U600-0738/EMD-U601-0720. On May 26, 2017, Westinghouse provided a Procurement Advisory Release (PAR) for Curtiss-Wright Electro-Mechanical Division's (CW-EMD's) technical justification with a disposition of "Approved" on PAR #4500265135-551-0 for V.C. Summer 2 & 3 and PAR #4500265132-576-0 for Vogtle 3 & 4." Provide a copy of the May 23, 2017, and May 26, 2017, letters.
2. Your follow-up response to NON 99901383/2016-201-02 failed to address an area of concern to the NRC staff. Specifically, in pages 4-6 and 4-7, the response states, in part, that for RLH sub-supplier accreditation, RLH uses two sub-suppliers that are accredited to ISO/IEC 17025:2005 for the calibration of test electrical equipment and test block standards for non-destructive examination equipment. The response also states, in part, "Having successfully completed the NRC-endorsed American Association of Laboratory Accreditation (A2LA) evaluation process, Trescal and West Penn Testing Group hold accreditation to perform..." The NRC's position on the use of the International Laboratory Accreditation Cooperation (ILAC) process for procurement of calibration and testing services is that it may only be used by the dedicating entity in lieu of performing a commercial-grade survey as part of the commercial-grade dedication process provided certain conditions are met. As such, since RLH is not the dedicating entity, CW-EMD cannot take credit for RLH's

use of the ILAC accreditation process to demonstrate that RLH provided adequate oversight of their suppliers. Describe what additional actions CW-EMD is planning to implement to ensure that RLH is providing adequate oversight of its sub-suppliers.

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.: 99901383

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Dated: September 15, 2017

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