

Date : September 4, 2018

US Nuclear Regulatory Commission
ATTN: Document Control Desk, Washington, DC 20555-0001
Copy: Chief, Quality Assurance Vendor Inspection Branch-1, Division of Construction Inspection and Operational Programs, Office of New Reactors

Subject: Reply to a Notice of Nonconformance

By letter dated August 6, 2018 we have received the Notice of Nonconformance containing 2 findings both of which are addressed in this response.

Nonconformance 99902060/2018-201-01: Surge Suppressors

(1) The reason for the noncompliance: The surge suppressors has been tested during the commercial dedication testing to ensure that they would not spuriously conduct at lower voltages. The proper design of the over voltage threshold was qualified by testing on a prototype system. However, this test has not been incorporated into the commercial dedication test plan.

(2) The corrective steps that have been taken and the results achieved: All surge suppressors, used for the safety-related inverters have been retested to ensure the proper function of the components.

(3) The corrective steps that will be taken to avoid further noncompliance: The template FMEA of the surge suppressors has been updated to reflect the need for dedication of the suppression function of the components.

(4) This corrective action has been completed on July 11, 2018.

Nonconformance 99902060/2018-201-02: insufficient test procedures for the over voltage test

(1) The reason for the noncompliance: This kind of test are executed as routine test for all equipment daily. The test personnel are trained to do this test even without specifying in the detail procedure. Therefore, this level of information was not included in the test procedure.

(2) The corrective steps that have been taken and the results achieved: The test procedures have been updated before testing of the units to include the acceptance limit for the battery charger overvoltage protection circuitry setpoint. All tests have been done as per updated test procedures.

(3) The corrective steps that have been to avoid further noncompliance: A Training for the engineering was conducted to strengthen the awareness to properly document all acceptance criteria, independent if this kind of tests are executed as standard routine by our trained test engineers.

(4) This corrective action has been completed on July 7, 2018.

Sincerely,



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