



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

February 4, 2019

Russell A. Bastyr
Vice President - Quality, Safety
and Performance Improvement
Westinghouse Electric Company
Nuclear Fuel and Component Manufacturing
5801 Bluff Road
Columbia, SC 29209

SUBJECT: WESTINGHOUSE ELECTRIC SWEDEN AB'S RESPONSE TO THE
U.S. NUCLEAR REGULATORY COMMISSION INSPECTION REPORT
NO. 99901408/2018-201, AND NOTICE OF NONCONFORMANCE

Dear Mr. Bastyr:

Thank you for your January 2, 2019, letter in response to the Notice of Nonconformance (NONs) that was discussed in the subject U.S. Nuclear Regulatory Commission (NRC) inspection report (IR).

We have reviewed your letter and found that it is not fully responsive to NON 99901408/2018-201-02. Specifically:

1. Your response to NON 99901408/2018-201-02 failed to address several areas of concern to the NRC staff. Please clarify your response as follows:
 - a. The response states that Welding Procedure Specification No. 172 provides the production process control limit as 0.5 to 2.0 mm and, based on information provided by the welder (during an interview after the inspection), the root gap is normally verified by the welder by using a filler material wire of 1.6 mm diameter. It is noted that the procedure requirement of 0.5 to 2.0 mm should be followed and measured with an appropriate gauge or measuring tool other than estimating and/or use of unapproved material/method. Discuss why it is acceptable to use a filler wire to measure a dimension in lieu of an appropriate gauge or measuring tool.
 - b. The response states that on this occasion, the root gap was measured to exceed the limits by 0.1 mm (total gap of 2.1 mm). However, as stated in the NRC's inspection report, only a feeler gauge of 2.0 mm was used. Since no other measuring device was used, discuss how the total gap of 2.1 mm was measured since the weld joint had been welded already.
 - c. The response states that the Procedure Qualification Report (PQR) shows that 3.0 mm had been used during welding qualification and the 2.0 mm limit is established as a production process control limit.

- i. Discuss how the full range of parameters are qualified for the 3.0 mm root gap, since PQR No. KR222-157, Revision 2, dated February 9, 2017, only used 2.0 mm maximum gap in the qualification weld.
 - ii. Discuss how the rework qualification performed in PQR No. 222-128 applies to the initial weld No. SF6 and how it covers the full range of parameters as stated in PQR No. KR222-157.
- d. The response states that Corrective Action No. 5 will issue lessons learned, but does not include any training to avoid future non-compliances. Discuss your plans to provide training to ensure that personnel understand that appropriate gauges or measuring tools are used to measure dimensions in lieu of just visual estimation and/or use of unapproved material/methods to avoid future non-compliances.

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/

Kerri A. Kavanagh, Chief
Quality Assurance Vendor Inspection Branches 1 and 2
Division of Construction Inspection
and Operational Programs
Office of New Reactors

Docket No.: 99901408

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