



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

November 26, 2019

Ms. Rosalie Nava
Director, Quality Assurance
Curtiss-Wright Enertech
2950 E. Birch St.
Brea, CA 92821

SUBJECT: NUCLEAR REGULATORY COMMISSION VENDOR INSPECTION REPORT OF CURTISS-WRIGHT ENERTECH, NO. 99901377/2019-201 AND NOTICE OF NONCONFORMANCE

Dear Ms. Nava:

Thank you for your October 4, 2019, letter in response to the Notice of Nonconformance (NON) 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 99901377/2019-201-01. Specifically:

1. Your response to NON 99901377/2019-201-01 failed to address several areas of concern to the NRC staff. Please clarify your response as follows:
 - a. The response does not follow the instructions as described in the NON. The NON requests that your submittal contain the following: 1) the reason for the noncompliance or, if contested, the basis for disputing the noncompliance; (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that will be taken to avoid further noncompliance; and (4) the date when the corrective action will be completed. In responding to this request for additional information, please submit the aforementioned items.
 - b. The response states that Enertech issued Corrective Action Request (CAR) No. 2182, dated July 26, 2019, to address the nonconformance. The NRC inspection team reviewed the contents of the CAR and identified the following concerns:
 1. The explanation for the reason of why the performance deficiency occurred does not adequately describe the issue (i.e. a required commercial grade survey was not performed). Rather, the response states that Enertech changed the scope and as such they performed both activities (commercial grade survey and NCA-3800 Audit) under the same **audit** (emphasis added), when, in fact, a commercial grade survey was required. The audit only addressed general programmatic controls that would not be the focus of a commercial grade survey. A description of the deficiencies that caused the nonconformance should be revised to adequately describe the issue.

2. The audit report that Enertech credited for this combined purpose lacks objective evidence that the critical characteristics of interest were verified. As stated in the CAR, the lead auditor verified programmatic controls and not the required critical characteristics. Please provide an explanation why the audit report lacked the appropriate objective evidence.
3. The audit checklist that supports this audit report failed to document with objective evidence that the requirements of NCA-3800 were verified and satisfied to qualify that commercial supplier as a Material Organization. The CAR fails to address this issue.
4. The CAR indicates that training was provided to the lead auditor. Were any other members of the Enertech organization provided the training? If not, why was it limited to the lead auditor only?
5. The CAR indicates that this was the only audit performed as a joint audit. However, as required for an extent of condition review, did Enertech confirm that there were no prior supplier qualifications which required Enertech to perform commercial grade survey activities (i.e., confirm control of specific critical characteristics) that were not adequately performed or did not adequately document specific objective evidence to confirm control of specific critical characteristics?

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."

R. Nava

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Please contact Mr. Greg Galletti at 301-415-1831, or via electronic mail at Greg.Galletti@nrc.gov, if you have any questions or need assistance regarding this matter.

Sincerely,

Kerri A. Kavanagh, Chief **/RA/**
Quality Assurance and Vendor Inspection Branch
Division of Reactor Oversight
Office of Nuclear Reactor Regulation

Docket No.: 99901377

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