

January 27, 2020 (Revised 2/26/20)

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555-0001

Subject: Reply to a Notice of Nonconformance, Docket No. 99901377, Report No. 2019-201, NRC Letter dated 11-26-2019

Reference: Nuclear Regulatory Commission Vendor Inspection Report of Curtiss-Wright Enertech, No. 99901377/2019-201 and Notice of Nonconformance 99901377/2019-201-01

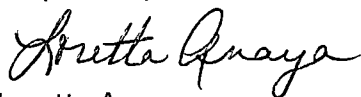
All,

The purpose of this document is to respond to the Notice of Nonconformance referenced above resulting from the NRC Vendor Inspection at the Curtiss-Wright Enertech facility in Brea, California on July 22 through July 26, 2019 and in reference to NRC Letter dated November 26, 2019.

We have completed the response internally and documented in Supplement 1- Reply to a Notice of Nonconformance. This addresses the reply to a Notice of Nonconformance 99901377/2019-201-01 and Enertech's response and identified all actions to CAR 2182 are closed.

If you have any questions regarding this issue, please contact me at your convenience via email at [lanaya@curtisswright.com](mailto:lanaya@curtisswright.com) or by phone at 714-982-1856.

Respectfully submitted,



Loretta Anaya  
Quality Assurance Manager, Enertech

Curtiss-Wright Nuclear Division  
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cc: Chief, QA Vendor Inspection Branch, Div. of Inspection and Regional Support, Office of Nuclear Reactor Regulation

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## **Supplement 1 – Reply to Notice of Nonconformance**

### **Curtiss-Wright ND Enertech – Docket No.: 99901377 (NON 99901377/2019-201-01)**

1. Your response to NON 99901377/20190-201-01 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. 282, 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 combine 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 member 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 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?

**Enertech Response (NON 99901377/2019-201-01) above:**

**Cause and Extent of Deficiency:**

The Lead Auditor had instructions to perform an NCA3800 Audit only, however during the course of the Audit there was a change in scope. Engineering later provided the Lead Auditor with critical characteristics (Material Control, Process Control, Inspection, and Nonconformance) to be evaluated for the Commercial Grade Survey, in addition to the NCA3800 Audit. The Lead Auditor decided to cover the required critical characteristics on the same Audit Checklist, instead of utilizing a separate Commercial Grade Survey Checklist.

**Corrective Action to Correct the Deficiency:**

The NCA3800 Audit Checklist revised, the scope of the Commercial Grade Survey is documented on a separate Commercial Grade Survey Check List, which covered all critical characteristic.

**Preventative Action:**

Complete an Extent of Condition by review of all Supplier Audits/Surveys on Enertech's Approved Suppliers List to determine if all Audits/Survey performed per NCA3800 Audit requirements and Commercial Grade Survey for required Critical Characteristic. Provide training to all Enertech Lead Auditors per Enertech's Operating Procedure (EOP) 8180 Rev. Y Audit Procedure, and EOP 8185 Rev. K Procedure for Commercial Grade Survey.

**Verification Summary of Corrective Action Taken:**

Completed training for all Enertech Lead Auditors on Enertech Operating Procedure (EOP) 8185 Commercial Grade Survey and EOP 8180 Audit Procedure. Completed Supplier Audit to applicable requirements of NCA3800/NCA4200 and completed Survey Report with Satisfactory requirements to the Critical Characteristic. Completed Extent of Condition Report of all current Enertech's Approved Suppliers list as satisfactory results of Audit NCA 3800 and Survey results of Critical Characteristics.

All required actions have been completed on 1/27/2020.