



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

December 15, 2020

Mr. David P Brown, P.E.
President
Lake Engineering Company
P.O. Box 296
10 Austin Avenue
Greenville, RI 02828

SUBJECT: NUCLEAR REGULATORY COMMISSION VENDOR INSPECTION REPORT OF
LAKE ENGINEERING COMPANY, NO. 99902090/2020-201

Dear Mr. Brown:

From November 2 through November 6, 2020, the U.S. Nuclear Regulatory Commission (NRC) staff conducted an inspection at Lake Engineering Company's (LEC's) facilities in Greenville, RI. The purpose of this limited-scope inspection was to assess LEC's compliance with the provisions of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 21, "Reporting of Defects and Noncompliance," and selected portions of Appendix B, "Quality Assurance Program Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities."

This technically-focused inspection specifically evaluated LEC's implementation of the quality activities associated with commercial grade dedication, assembly, and testing of safety-related snubber components being supplied to the U.S. operating nuclear power plants. The enclosed report presents the results of the inspection. This NRC inspection report does not constitute NRC endorsement of LEC's overall quality assurance (QA) or 10 CFR Part 21 programs.

Based on the results of this inspection, the NRC inspection team found the implementation of your QA program met the applicable technical and requirements imposed on you by your customers or NRC licensees. No findings of significance were identified.

In accordance with 10 CFR 2.390, "Public Inspections, Exemptions, Requests for Withholding," of the NRC's "Rules of Practice," the NRC will make available electronically for public inspection a copy of this letter, its enclosure, and your response through the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System, which is accessible at <http://www.nrc.gov/reading-rm/adams.html>.

If you have any questions concerning this matter, please contact Mr. Aaron Armstrong of my staff at (301) 415-8396.

Sincerely,

/RA/

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

Docket No.: 99902090

EPID No.: I-2020-001-0158

Enclosure:

1. Inspection Report No. 99902090/2020-201
and Attachment

SUBJECT: NUCLEAR REGULATORY COMMISSION VENDOR INSPECTION REPORT OF
LAKE ENGINEERING Company, NO. 99902090/2020-201
DATED: DECEMBER 15, 2020

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ADAMS Accession No.: ML20338A396

NRR-106

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DATE	12/10/2020	12/10/2020	12/14/2020
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NAME	AArmstrong	KKavanagh	
DATE	12/10/2020	12/15/2020	

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**U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF NUCLEAR REACTOR REGULATION
DIVISION OF REACTOR OVERSIGHT
QUALITY ASSURANCE AND VENDOR INSPECTION REPORT**

Docket No.: 99902090

Report No.: 99902090/2020-201

Vendor: Lake Engineering Company
P.O. Box 296
10 Austin Avenue
Greenville, RI 02828

Vendor Contact: Mr. David P. Brown, P.E.
President
Lake Engineering Company
Email: dbrown@lakeengineeringri.com

Nuclear Industry Activity: The Lake Engineering Company facility is located in Greenville, Rhode Island. This facility provides safety-related snubber components for U.S. nuclear power plants.

Inspection Dates: November 2-6, 2020

Inspection Team Leader Aaron Armstrong NRR/DRO/IQVB Team Lead

Inspectors: Paul Prescott NRR/DRO/IQVB
Yiu Law NRR/DRO/IQVB
Gurjendra Bedi NRR/DEX/EMIB

Approved by: Kerri A. Kavanagh, Chief
Quality Assurance and Vendor Inspection Branch
Division of Reactor Oversight
Office of Nuclear Reactor Regulation

EXECUTIVE SUMMARY

LAKE ENGINEERING COMPANY
99902090/2020-201

The U.S. Nuclear Regulatory Commission (NRC) staff conducted a vendor inspection at the Lake Engineering Company (LEC) facility in Greenville, RI to verify that it had implemented an adequate quality assurance (QA) program that complies with the requirements of Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, "Domestic Licensing of Production and Utilization Facilities" and 10 CFR Part 21, "Reporting of Defects and Noncompliance." This was the first NRC vendor inspection at LEC.

This technically-focused inspection specifically evaluated LEC's implementation of the quality activities associated with the commercial grade dedication and testing of safety-related snubber components being supplied to U.S. operating nuclear power plants.

These regulations served as the bases for the NRC inspection:

- Appendix B to 10 CFR Part 50
- 10 CFR Part 21

During the course of this inspection, the NRC inspection team implemented Inspection Procedure (IP) 43002, "Routine Inspections of Nuclear Vendors," dated January 27, 2017; IP 43004, "Inspection of Commercial-Grade Dedication Programs," dated January 27, 2017; and IP 36100, "Inspection of 10 CFR Part 21 and Programs for Reporting of Defects and Noncompliance," dated May 16, 2019.

The NRC inspection team concluded that LEC's QA policies and procedures comply with the applicable requirements of Appendix B to 10 CFR Part 50 and 10 CFR Part 21, and that LEC's personnel are implementing these policies and procedures effectively. The results of this inspection are summarized below.

10 CFR Part 21 Program

The NRC inspection team reviewed LEC's policies and implementing procedures that govern the implementation of its 10 CFR Part 21 program to verify compliance with the requirements of 10 CFR Part 21. The NRC inspection team: 1) reviewed the 10 CFR Part 21 postings; 2) reviewed a sample of purchase orders (POs); 3) verified that LEC's nonconformance and correction action programs provide a link to the 10 CFR Part 21 program; 4) reviewed a sample of 10 CFR Part 21 evaluations; and 5) verified that LEC's employee training records show that they fully understand and are in compliance with 10 CFR Part 21 as it pertains to their jobs. No findings of significance were identified.

Nonconforming Materials, Parts, or Components and Corrective Action

The NRC inspection team reviewed LEC's policies and implementing procedures that govern the Nonconforming Materials, Parts, or Components and Corrective Action program to verify compliance with the requirements of Criterion XV, "Nonconforming Materials, Parts, or Components," and Criterion XVI, "Corrective Action," of Appendix B to 10 CFR Part 50. The

NRC inspection team reviewed a sample of LEC's Nonconformance and corrective action reports. No findings of significance were identified.

Audits

The NRC inspection team reviewed LEC's policies and implementing procedures that govern the implementation of its internal audit program to verify compliance with the regulatory requirements of Criterion VII, "Control of Purchased Material, Equipment, and Services" and Criterion XVIII, "Audits," of Appendix B to 10 CFR Part 50. The NRC inspection team reviewed the frequency of the internal audits, the independence and qualification of auditors, the audit reports' objective evidence, and verified findings were captured in the corrective action program. No findings of significance were identified.

Design Control

The NRC inspection team reviewed LEC's policies and implementing procedures that govern the implementation of its design control program to verify compliance with the requirements of Criterion III, "Design Control," of Appendix B to 10 CFR Part 50. The NRC inspection team reviewed a sample of design change packages and calculations packages. No findings of significance were identified.

Commercial-Grade Dedication

The NRC inspection team reviewed LEC's policies and implementing procedures that govern the commercial-grade dedication program to verify compliance with the requirements of Criterion III, "Design Control," and Criterion VII "Control of Purchased Material, Equipment, and Services," of Appendix B to 10 CFR Part 50. The NRC inspection team reviewed a sample of LEC's surveys, procurement documents and commercial-grade dedication packages. No findings of significance were identified.

REPORT DETAILS

1. 10 CFR Part 21 Program

a. Inspection Scope

The U.S. Nuclear Regulatory Commission (NRC) inspection team reviewed Lake Engineering Company's (LEC's) policies and implementing procedures that govern the implementation of its Title 10 of the *Code of Federal Regulations* (10 CFR) Part 21, "Reporting of Defects and Noncompliance," program to verify compliance with the regulatory requirements. The NRC inspection team also evaluated the 10 CFR Part 21 postings and a sample of LEC's purchase orders (POs) for compliance with the requirements of 10 CFR 21.21, "Notification of Failure to Comply or Existence of a Defect and its Evaluation," and 10 CFR 21.31, "Procurement Documents." In addition, the NRC inspection team also verified that LEC's nonconformance and corrective action procedures provide a link to the 10 CFR Part 21 program. Furthermore, for a sample of 10 CFR Part 21 evaluations performed by LEC, the NRC inspection team verified that LEC had effectively implemented the requirements for evaluating deviations and failures to comply. The NRC inspection team also verified that LEC employees have up to date training records and that they fully understand and are in compliance with 10 CFR Part 21 as it pertains to their jobs.

The NRC inspection team also discussed the 10 CFR Part 21 program with LEC's management and technical staff. The attachment to this inspection report lists the documents reviewed and personnel interviewed by the NRC inspection team.

b. Observations and Findings

No findings of significance were identified.

c. Conclusion

The NRC inspection team concluded that LEC was implementing its 10 CFR Part 21 program in accordance with the regulatory requirements of 10 CFR Part 21. Based on the limited sample of documents reviewed, the NRC inspection team also determined that LEC was implementing its policies and procedures associated with the 10 CFR Part 21 program. No findings of significance were identified.

2. Nonconforming Materials, Parts, or Components and Corrective Action

a. Inspection Scope

The NRC inspection team reviewed LEC's policies and implementing procedures that govern the control of nonconformances and corrective action to verify compliance with the requirements of Criterion XV, "Nonconforming Materials, Parts, or Components," and Criterion XVI, "Corrective Action," of Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities," respectively. Additionally, the NRC inspection team interviewed LEC's personnel to verify there were designated areas to segregate and control nonconforming materials.

The NRC inspection team reviewed Nonconformance/Corrective Action Report (NCAR) No. 2019-001 dated January 4, 2019 and the attached evaluation that provided information about Clinton plant's snubbers. The NRC inspection team reviewed LEC's corrective actions for the various batches of fluid SF-1154 fluid for potential degraded fluid conditions. The NRC inspection team also reviewed the documentation for a selected sample of snubber fluid SF1154 batch ZJS1518, that provided objective evidence that the snubber fluid SF1154, batch ZJS1518, was adequately evaluated and appropriate corrective actions implemented.

The NRC inspection team discussed the corrective action program with LEC's management and technical personnel. The attachment to this inspection report lists the documents reviewed and personnel interviewed by the NRC inspection team.

b. Observations and Findings

No findings of significance were identified.

c. Conclusion

The NRC inspection team concluded that LEC is implementing its nonconforming materials, parts, or components and corrective action program activities in accordance with the regulatory requirements of Criterion XV and Criterion XVI of Appendix B to 10 CFR Part 50. Based on the limited sample of documents reviewed and activities observed, the NRC inspection team determined that LEC is implementing its policies and procedures associated with nonconforming materials, parts, or components and corrective action program activities. No findings of significance were identified.

3. Audits

a. Inspection Scope

The NRC inspection team reviewed LEC's policies and implementing procedures that govern its audit program to verify compliance with the requirements Criterion VII, "Control of Purchased Material, Equipment, and Services," and Criterion XVIII, "Audits," of Appendix B to 10 CFR Part 50.

The NRC inspection team reviewed a sample of audits to verify the scope, frequency and independence of the auditors from the topic they were auditing. Additionally, the NRC inspection team reviewed LEC's Approved Suppliers List (ASL) and selected a sample of suppliers to review the methodology of conducting and documenting audits to verify adequate evaluation of the sub-supplier's quality practices. The NRC inspection team reviewed LEC's process for conducting audits at an established frequency. The NRC inspection team verified that LEC had prepared and approved plans that identified the audit scope and applicable checklist criteria before the initiation of the audit activity.

The NRC inspection team also discussed the audit program and performance audits with LEC's management and technical staff. The attachment to this inspection report lists the documents reviewed and personnel interviewed by the NRC inspection team.

b. Observation and Findings

No findings of significance were identified.

c. Conclusion

The NRC inspection team concluded that LEC is implementing its audit program in accordance with the regulatory requirements of Criterion VII and Criterion XVIII of Appendix B to 10 CFR Part 50. Based on the limited sample of documents reviewed and activities observed, the NRC inspection team determined that LEC is implementing its policies and procedures associated with the internal audit program. No findings of significance were identified.

4. Design Control

a. Inspection Scope

The NRC inspection team reviewed LEC's policies and implementing procedures that govern the implementation of its design control to verify compliance with the requirements of Criterion III, "Design Control," of Appendix B to 10 CFR Part 50. The NRC inspection team discussed the design issues of snubbers and snubber fluid with LEC's management. The attachment to this inspection report lists the documents reviewed and personnel interviewed by the NRC inspection team.

The NRC Inspection team reviewed evaluations and evaluation methods used for the snubber fluid SF-1154 regarding the suspended particulate in fluid batches AD965, ZJS1518, 14ELVS145, and 11 KLVS146. The evaluations cover the snubbers with fluid SF1154 Batch ZJS1581 supplied by LEC and potentially used at various nuclear plants which included Three Mile Island, Nine Mile Point, Clinton, Point Beach Unit 2, Duane Arnold, and Indian Point Unit 2. The NRC inspection team reviewed the objective evidence that corrective actions were completed for the snubber fluid SF1154 batch ZJS1518 and adequately evaluated and implemented. Based on this review, the NRC inspection team determined that LEC performed an adequate evaluation of the snubber fluid SF1154 and addressed all the identified issues. The NRC inspection team concluded that all the snubbers with fluid SF-1154 (batch ZJS1518) are operational and will perform their intended function at the affected plants.

b. Observation and Findings

No findings of significance were identified.

c. Conclusion

The NRC inspection team concluded that LEC is implementing its design control program in accordance with the regulatory requirements of Criterion III of Appendix B to 10 CFR Part 50. Based on the limited sample of documents reviewed, the NRC inspection team also determined that LEC is implementing its policies and procedures associated with the design control program. No findings of significance were identified.

5. Commercial-Grade Dedication

a. Inspection Scope

The NRC inspection team reviewed LEC's policies and implementing procedures that govern the implementation of its commercial-grade dedication (CGD) to verify compliance with the requirements of Criterion III, "Design Control," and Criterion VII "Control of Purchased Material, Equipment, and Services," of Appendix B to 10 CFR Part 50. The NRC inspection team also reviewed LEC's policies and implementing procedures that govern oversight of contracted commercial items and services to verify compliance with the requirements of Criterion IV, "Procurement Document Control," and Criterion VII of Appendix B to 10 CFR Part 50. The NRC inspection team discussed the CGD process with LEC's management. The attachment to this inspection report lists the documents reviewed and personnel interviewed by the NRC inspection team.

a.1 Commercial Grade Dedication

The NRC inspection team reviewed the CGD methodology for items and services for safety-related replacement snubber components, including the development of critical characteristics (CCs), technical evaluations, failure mode and effects analysis, acceptance criteria methods, sampling methodology, checklists, survey reports, and associated POs. The NRC inspection team reviewed the CGD process for several various snubber component product types. Components reviewed included, but were not limited to rubber seals, silicone fluid, bearings, springs, fasteners, and structural material. The NRC inspection team evaluated a sample of technical evaluations and concluded that the technical evaluations in the dedication methodology appropriately identified the CCs necessary to provide reasonable assurance that the item or service would ensure the component would perform its intended safety function.

a.2 Commercial-Grade Surveys

The NRC inspection team reviewed procedures and controls for CGD of calibration or testing services and ensured the appropriate requirements were imposed in the procurement documents. The NRC inspection team reviewed a sample of POs to verify inclusion, as appropriate, of the scope of work and the extension of contractual requirements to subcontractors. The NRC inspection team reviewed LEC's ASL and selected a sample of suppliers to review the methodology of conducting and documenting surveys. The NRC inspection team reviewed LEC's process of selecting and approving commercial suppliers and service providers. The NRC inspection team verified that LEC had prepared and approved plans that identify the scope and applicable CCs to be verified before initiation of the survey.

b. Observation and Findings

In the NRC inspection team's review of the CGD process, it was identified that the current procedure, LEC-IMP-001, "Dedication of Commercial Grade Items and Services," Revision 9, did not have the correct definition for *commercial grade item*. The NRC inspection team also identified that the technical evaluation form for high pressure Lenz fittings did not include recording of the pressure test. However, there were no recent CGD activities performed for the fittings. The previous version of the

form had the pressure test included. Therefore, no fittings were inadequately dedicated. On the technical evaluation form for phenolic backup rings, the recording of the results of the Fourier-transform infrared spectroscopy (FTIR) analysis as a critical characteristic was missing. However, the associated LEC-IMP-001 procedure had a FTIR test analysis as a CC to verify. No previous CGD activities were performed. Therefore, no rings were inadequately dedicated. The quality assurance manager initiated Nonconformance/Corrective Action Report (NCAR) No. 2020-010 and actions were immediately implemented to correct the procedural deficiencies.

c. Conclusion

The NRC inspection team concluded that LEC is implementing its CGD program activities in accordance with the regulatory requirements of Criterion III and Criterion VII of Appendix B to 10 CFR Part 50. Based on the limited sample of documents reviewed and activities observed, the NRC inspection team determined that LEC is implementing its policies and procedures associated with CGD program and oversight of contracted activities. No findings of significance were identified.

6. Entrance and Exit Meetings

On November 2, 2020, the NRC inspection team discussed the scope of the inspection with Mr. David Brown, President, and Ms. Patricia Guay, Quality Assurance Manager of LEC's management. On November 6, 2020, the NRC inspection team presented the inspection results and observations during an exit meeting with Mr. David Brown and Ms. Patricia Guay of LEC's management. The attachment to this report lists the attendees of the entrance and exit meetings, as well as those individuals whom the NRC inspection team interviewed.

ATTACHMENT

1. Entrance/Exit Meeting Attendees and Persons Interviewed

Name	Title	Affiliation	Entrance	Exit	Interviewed
Aaron Armstrong	Inspection Team Leader	NRC	X	X	
Paul Prescott	Inspector	NRC	X	X	
Yiu Law	Inspector	NRC	X	X	
Gurjendra Bedi	Technical Staff	NRC			
Kerri Kavanagh	Branch Chief	NRC		X	
David Brown	President	Lake Engineering	X	X	X
Patricia Guay	Quality Assurance Manager	Lake Engineering			X

2. INSPECTION PROCEDURES USED

- Inspection Procedure (IP) 36100, "Inspection of 10 CFR Part 21 and Programs for Reporting Defects and Noncompliance," dated May 16, 2019
- IP 43002, "Routine Inspections of Nuclear Vendors," dated January 27, 2017
- IP 43004, "Inspection of Commercial-Grade Dedication Programs," dated January 27, 2017

3. DOCUMENTS REVIEWED

Policies and Procedures

- Quality Procedure Manual (QPM) 8.0, "Operations," dated July 21, 2017
- LEC-IMP-1, "Dedication of Commercial Grade Items and Services," Revision 9
- LEC-IMP-24, "Technical Evaluation of Like-for-Like Commercial Grade Items and Services for Use in Safety-Related Applications," Revision 0
- LEC-IMP-24, Evaluation No. 1, "Lenz Fittings," Revision 0
- LEC-IMP-24, Evaluation No. 2, "Rubber Seals," Revision 0
- LEC-IMP-24, Evaluation No. 3, "Silicone Seals," Revision 0
- LEC-IMP-24, Evaluation No. 4, "Bearings," Revision 0
- LEC-IMP-24, Evaluation No. 5, "Control Valve Lockup Springs," Revision 0
- LEC-IMP-24, Evaluation No. 6, "Reservoir Sight Glass," Revision 0
- LEC-IMP-24, Evaluation No. 7, "Fasteners not in Primary Load Path," Revision 0
- LEC-IMP-24, Evaluation No. 8, "External Retaining Rings," Revision 0
- LEC-IMP-24, Evaluation No. 9, "Structural Material," Revision 0
- LEC-IMP-24, Evaluation No. 10, "Calibration Service Not Accredited per ISO/IEC 17025," Revision 0
- LEC-IMP-24, Evaluation No. 11, "Laboratory and Calibration Service Accredited per ISO/IEC 17025," Revision 0
- LEC-IMP-24, Evaluation No. 12, "Machining Service," Revision 0

- LEC-IMP-24, Evaluation No. 13, "Case Hardening Service," Revision 0
- LEC-IMP-24, Evaluation No. 14, "Phenolic Backup Rings for Anker-Holth Snubbers," Revision 0

Design Documents

- Cutiss-Wright (EnerTech), Event Notice No. 54001, April 15, 2019 for Snubber Fluid SF1154 Batch 14ELVS145 (Momentive)
- Engineering Report, DOC No. ER-07127-01, Performance Testing of Fronex A/DE Hydraulic Snubbers Utilizing Snubber Fluid GE SF1154, Batch AD965, dated January 21, 2008.
- Anvil Report PE 07-45-1, Evaluation of the Fig 200N Model PH74 Snubber used SF-1154 Silicon Fluid Batch AD965, dated June 18, 2007.
- Anvil Report PE 07-45-2, Evaluation of the Fig 200N Configuration "A" Snubber with SF-1154 Silicon Fluid Batch AD965, dated June 18, 2007.
- Anvil Report PE 07-45-4, Evaluation of the Fig 200N Model PH72 Snubber Valves used with SF-1154 Silicon Fluid Batch AD965, dated June 18, 2007.

Nonconformances/Corrective Actions

- Nonconformance/Corrective Action Report No. 2019-003, dated November 1, 2019
- Nonconformance/Corrective Action Report No. 2020-009, dated August 3, 2020
- Nonconformance/Corrective Action Report No. 2020-002, dated April 9, 2020
- Nonconformance/Corrective Action Report No. 2020-001, dated January 4, 2019
- Nonconformance/Corrective Action Report No. 2017-006, dated March 6, 2017
- Nonconformance/Corrective Action Report No. 2018-003, dated June 13, 2018

Corrective Actions Generated during this Inspection

- Nonconformance/Corrective Action Report No. 2020-010, dated November 3, 2020

10 CFR Part 21 Reports

- Part 21 Lake Engineering Company Report for Degraded Snubber Fluid Batch 14ELVS145 (Momentive) dated May 1, 2017 (ADAMS Accession No. ML17128A465)
- Part 21 Lake Engineering Company Report for Degraded Snubber Fluid SF1154 Batch ZJS1518 (Momentive) dated March 5, 2017 (ADAMS Accession No. ML19077A096)
- Part 21 Lake Engineering Company Report for Degraded Snubber Fluid SF1154 Batch 11ELVS146 (Momentive) dated July 25, 2018 (ADAMS Accession No. ML18211A302)
- Letter to NRC, "Interim Notification per 10 CFR Part 21 Degraded Snubber SF1154 Hydraulic Fluid Batch No. ZJS1518," dated March 5, 2019 (ADAMS Accession No. ML19077A096)
- Letter to NRC, "Second Interim Notification per 10 CFR Part 21 Degraded Snubber SF1154 Hydraulic Fluid Batch No. ZJS1518," dated May 6, 2019 (ADAMS Accession No. ML19136A044)
- Letter to NRC, "Third Interim Notification per 10 CFR Part 21 Degraded Snubber SF1154 Hydraulic Fluid Batch No. ZJS1518," dated July 5, 2019 (ADAMS Accession No. ML19199A034)

- Letter to NRC, “Third (Fourth) Interim Notification per 10 CFR Part 21 Degraded Snubber SF1154 Hydraulic Fluid Batch No. ZJS1518,” dated September 9, 2019 (ADAMS Accession No. ML19263A666)
- Letter to NRC, “Potential Degraded Snubber SF1154 Hydraulic Fluid Batch No. ZJS1518 Final Report per 10 CFR Part 21,” dated November 7, 2019 (ADAMS Accession No. ML19325C094)
- Letter to NRC, “Interim Notification per 10 CFR Part 21 Degraded Snubber SF1154 Hydraulic Fluid Batch No. 16DLVS852,” dated January 3, 2020 (ADAMS Accession No. ML20021A045)
- Letter to NRC, “Second Interim Notification per 10 CFR Part 21 Degraded Snubber SF1154 Hydraulic Fluid Batch No. 16DLVS852,” dated March 20, 2020 (ADAMS Accession No. ML20097B691)
- Letter to NRC, “Third Interim Notification per 10 CFR Part 21 Degraded Snubber SF1154 Hydraulic Fluid Batch No. 16DLVS852,” dated June 4, 2020 (ADAMS Accession No. ML20171A401)
- Letter to NRC, “Fourth Interim Notification per 10 CFR Part 21 Degraded Snubber SF1154 Hydraulic Fluid Batch No. 16DLVS852,” dated August 3, 2020 (ADAMS Accession No. ML20234A353)
- Letter to NRC, “Degraded Snubber SF1154 Hydraulic Fluid Batch No. 16DLVS852 Final Report per 10 CFR Part 21,” dated October 14, 2020 (ADAMS Accession No. ML20304A161)
- Letter to NRC, “Interim Notification per 10 CFR Part 21 Degraded Snubber SF1154 Hydraulic Fluid Batch No. ZJS1518,” dated March 5, 2019 (ADAMS Accession No. ML19077A096)
- Letter to NRC, “Interim Notification per 10 CFR Part 21 Degraded Snubber SF1154 Hydraulic Fluid Batch No. 17BLVS293,” dated June 8, 2020 (ADAMS Accession No. ML20178A308)
- Letter to NRC, “Second Interim Notification per 10 CFR Part 21 Degraded Snubber SF1154 Hydraulic Fluid Batch No. 17BLVS293,” dated August 7, 2020 (ADAMS Accession No. ML20241A081)
- Letter to NRC, “Third Interim Notification per 10 CFR Part 21 Degraded Snubber SF1154 Hydraulic Fluid Batch No. 17BLVS293,” dated October 6, 2020 (ADAMS Accession No. ML20296A276)

Procurement Documents (PO)

- PO 00352068, dated April 26, 2016 (Energy Northwest)
- PO 4500431322, dated February 6, 2018 (Dominion)
- PO 4500526432, dated May 6, 2018 (Dominion)
- PO 02386498 dated August 17, 2018 for sub-supplier
- PO 02390478, dated December 6, 2018 (FPL/NextEra)
- PO 4500001798, dated November 15, 2016 for sub-supplier
- PO 2472, dated February 22, 2012 for sub-supplier
- Receiving Examination Report for PO 2472, dated March 7, 2012
- PO 2736, dated October 22, 2015 for sub-supplier
- Receiving Examination Report for PO 2736, dated December 9, 2015
- PO 3009, dated July 9, 2020 for sub-supplier
- PO 3023, dated September 10, 2020 for sub-supplier
- PO 3026, dated October 13, 2020 for sub-supplier
- PO 3027, dated October 13, 2020 for sub-supplier

Measuring and Testing Equipment (M&TE) Records

- M&TE Calibration Record for Pressure Gauge by Wiess Instrument, Control No. LEC-510, dated October 15, 2019
- M&TE Calibration Record for Dial Caliper by Mitutoyo, Control No. LEC-209, dated September 16, 2020

Commercial-Grade Surveys/Audit Reports

- Audit: Corporate Internal Nuclear Audit, dated October 19, 2017
- Audit: Corporate Internal Nuclear Audit, dated February 26-28, 2019
- Audit: External vendor, WES-2019-112, dated December October 22-24, 2019
- Audit: External vendor, WES-2019-113, dated December 10-12, 2019
- Audit, External vendor, dated July 8-10, 2020
- Commercial Grade Survey, dated November 4, 2015
- Commercial Grade Survey, dated May 1, 2015
- Commercial Grade Survey, dated September 18, 2015
- Qualification records for LEC's contract Lead Auditor for surveys
- Form QA 7.0 E, "Receiving Examination Report for Machining Services for Poppet Flats," dated February 25, 2016
- "Commercial Supplier Evaluation Report for Metrology Services," dated September 30, 2020
- Form QA 7.0 E, "Receiving Examination Report Silicone Fluid," dated June 25, 2020
- Form QA 7.0 E, "Receiving Examination Report O-Rings," dated September 14, 2020
- Form QA 7.0 E, "Receiving Examination Report Rubber Testing Services by Laboratory," dated September 14, 2020
- Form QA 7.0 E, "Receiving Examination Report Check Valves," dated May 7, 2020
- Form QA 7.0 E, "Receiving Examination Report Backup Ring," dated July 8, 2020
- Survey – "Commercial Supplier Evaluation Report for Testing Laboratory," (rubber/plastics testing, polymer identification, FTIR spectroscopy)
- Survey – "Commercial Supplier Evaluation Report for Commercial Seals and Gaskets," (material traceability and control) dated September 30, 2020
- Survey – "Commercial Supplier Evaluation Report for Commercial Seals and Seal Material," (material traceability and control) dated September 30, 2020

Training Records

- Training Record for Annual 10 CFR 21 Training, dated January 13, 2020
- Training Record for Annual QA Manual Review, dated January 13, 2020
- Training Record for Annual Implementing Procedure Review, dated January 13, 2020

Audit

- Audit WT-WTHQN-2018-00401 , dated November 5-9, 2018