



**MANUFACTURING
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July 29, 2021

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

Reference: NUCLEAR REGULATORY COMMISSION VENDOR INSPECTION REPORT OF SOR INC. NO. 99900824/2021-201,
AND NOTICE OF NONCONFORMANCE, dated June 30, 2021

Subject: Reply to Notice of Nonconformance 99900824/2021-201

SOR Inc. is providing the enclosed response to the subject Notice of Nonconformance Report Number 99900824/2021-201 and Notice of Nonconformance (NON), dated June 30, 2021. Details regarding the corrective actions associated with this NON are provided in the attachment to this letter.

Should you have any questions or require additional information, please contact me at (913) 956-3160 or by email:
mdirks@sorinc.com.

Sincerely,



Melanie Dirks
Director of Quality
SOR Inc.

Enclosure

c: Kerri A. Kavanagh US NRC
Bert Benton SOR
Mike Bequette SOR



SOR's Response to Nonconformance 99900824/2021-201-01:

Reason for Noncompliance

SOR prematurely closed its corrective action reports (CAR's) 972, 974, 975, and 976 without adequate verification and effectiveness validation of implementing corrective actions.

Corrective Steps Taken and Results Achieved

SOR issued Corrective Action Report (CAR) 1035 on July 9, 2021, to formally address the NON, and corrective actions to be taken. An extent of condition was performed and concluded with no reportable deviation.

Root cause of the corrective action program deficiency is due to an inadequate systematic closed-loop review and effectiveness follow-up for corrective actions.

SOR procedure 094-152 "Corrective Action Report" was revised 6/15/2021 to clarify that the Quality Review Board (QRB) will review the permanent corrective actions implemented to determine if the CAR is considered complete. QRB will sign off closure of the CAR when the effectiveness of the permanent corrective action is provided and deemed approved as part of the corrective action file.

Training of key personnel was completed as of 6/24/21.

SOR procedure 7701-128 "Internal Audit Work Instruction" was revised 6/15/2021 to clarify the responsibilities of the audit team to evaluate objective evidence to the extent necessary to determine if those processes are effectively implemented. If previous audit follow-up results are determined to be unsatisfactory or unable to validate, this will be noted on the audit report. The significance of this condition will be determined. Any outstanding actions will be documented and validated at the next internal audit cycle.

Training of key personnel was completed as of 6/29/21.

SOR procedure 094-043 "Non Conformance Report" was revised 6/15/21 to include transactional disposition codes "accept" (ACC) and "destroyed in test" (DIT) and definition of their usage. Disposition code ACC is used by Inspection for accepting conforming parts that are among a lot of parts written on a material review report (MRR). Disposition code DIT is used by Inspection when parts are destroyed during testing and inspection before the remainder of the lot can be dispositioned.

Training of key personnel was completed as of 7/6/21.

Corrective Steps to Avoid Further Noncompliance

Test report 9058-112 will be revised to clarify the qualified life of the various versions of model 131 and 141 differential pressure switches.

Corrective Action Completion Date

The target completion date for the test report revision is August 31, 2021.