



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

February 16, 2022

Mr. Victor Montalbano  
Vice-President, Quality and Performance  
Framatome Inc.  
3315 Old Forest Road  
Lynchburg, VA 24501

SUBJECT: NUCLEAR REGULATORY COMMISSION VENDOR INSPECTION REPORT OF  
FRAMATOME, INC. NO. 99901300/2021-201 AND NOTICE OF  
NONCONFORMANCE

Dear Mr. Montalbano:

Thank you for your January 12, 2022, 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 99901300/2021-201-01. Specifically:

1. The corrective actions taken seem to be programmatic in nature and focus on steps taking to avoid further noncompliance. However, your response does not address any actions taken by Framatome to adequately determine other potential sources of the discrepancy associated with the Nodal Expansion Method Optimized (NEMO) code. For example, performing additional sensitivity studies or higher-order calculations to further investigate the sensitivity of the NEMO predictions to evolutionary design changes implemented at Arkansas Nuclear One, Unit 1, such as progressively higher loading of stainless steel rods (SSRs) and use of SSRs in fresh assemblies. Clarify what actions have been taken to ensure other potential sources of the discrepancy associated with the NEMO code are being considered and evaluated.
2. Your response letter states, in part, that "US Fuel Procedure 1703-88, Section 7.1 will be revised to clarify when receipt of a formal customer complaint with a Framatome product or service requires initiation of a condition report." Explain how this revision will address, as stated in your response letter, "a wrong assumption not to initiate a condition report based on the subsequent customer recognition and confirmation that other significant causal factors were present." In addition, provide supporting details about the procedure revision.

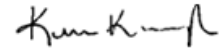
In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390, "Public Inspections, Exemptions, Requests for Withholding," the NRC will make available electronically for public inspection a copy of this letter, its enclosure, and your response through the NRC's Public Document Room or from the NRC's Agencywide Documents Access and Management System, which is accessible at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response (and if applicable), should not include any personal privacy, proprietary, or Safeguards Information (SGI) 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, 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 be 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 would 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 SGI 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,

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



Signed by Kavanagh, K  
on 02/16/22

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<b>NAME</b>	YDiaz-Castillo	JDean	BParks	KKavanagh
<b>DATE</b>	02/15/2022	02/15/2022	02/16/2022	02/16/2022

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