

# framatome

March 1, 2022  
NRC:22:005

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

## Reply to a Notice of Nonconformance 99901300/2021-201-01

Ref. 1: Letter, Kerri A. Kavanagh (NRC) to Victor Montalbano (Framatome Inc.), "Nuclear Regulatory Commission Vendor Inspection Report of Framatome Inc. No. 99901300/2021-201 and Notice of Nonconformance," December 9, 2021.

Ref. 2: Letter, Victor Montalbano (Framatome Inc.) to Kerri A. Cavanagh (NRC), "Reply to a Notice of Nonconformance 99901300/2021-201-01," NRC:22:001, January 12, 2022.

Ref. 3: Letter, Kerri A. Kavanagh (NRC) to Victor Montalbano (Framatome Inc.), "Nuclear Regulatory Commission Vendor Inspection Report of Framatome Inc. No. 99901300/2021-201 and Notice of Nonconformance," February 16, 2022.

Framatome Inc. (Framatome) received an inspection report and Notice of Nonconformance in Reference 1. Framatome responded to the Notice of Nonconformance in Reference 2. Framatome received a request for additional information in Reference 3. Framatome's response to the request for additional information is enclosed as Attachment A.

Framatome is and will remain focused on ensuring that our activities are conducted in accordance with Criterion XVI, "Corrective Action," 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." If you have any questions or concerns about this reply, please do not hesitate to contact me by telephone at (434) 832-3368, or by e-mail at [Victor.Montalbano@framatome.com](mailto:Victor.Montalbano@framatome.com).

Sincerely,



Victor Montalbano, Vice President  
Quality and Performance  
Framatome Inc.

IE09  
NRR

cc: Kerri Kavanagh, NRC Chief, Quality Assurance and Vendor Inspection Branch  
Gary Mignogna, CEO, Framatome Inc.

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Attachment A

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.

***Response:***

Framatome rescreened the initial Condition Report (CR) for the technical issues identified by Arkansas Nuclear One, Unit 1, from a Level 3 to a Level 2. A Level 2 CR requires the initiation of an Apparent Cause Analysis (ACA). The ACA performed for this issue identified the apparent and contributing causes of the technical concerns in addition to establishing corrective and preventive actions to address the technical concerns.

During rescreening of the CR, Framatome also readdressed if the issue should be evaluated under 10 CFR 21. The initial decision that the issue did not require a 10 CFR 21 evaluation remained valid.

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.

***Response:***

US Fuel Procedure 1703-88, Section 7.1, was revised to clarify that at receipt of a formal customer or regulator concern, complaint or audit finding with the Framatome Quality Assurance Program, product, or service, a CR is required to be initiated to fully evaluate the issue and identify applicable corrective/preventive actions. The purpose for the revision of the procedure was to clarify the responsibility to initiate a CR to fully evaluate customer concerns.