

January 13, 2023

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

Subject: Reply to a Notice of Nonconformance 99901454/2022-201-01

Reference: Nuclear Regulatory Commission Inspection of Reuter-Stokes, LLC Report No. 99901454/2022-201, and Notice of Nonconformance, dated December 15, 2022

Enclosed as Attachment A, please find the response from Reuter-Stokes, LLC to the U.S. Nuclear Regulatory Commission Notice of Nonconformance 99901454/2022-201-01. Reuter-Stokes has taken actions to address the nonconforming condition identified by the NRC inspection team during the inspection of Reuter-Stokes performed from October 31 – November 4, 2022.

Should you have any questions or require additional information, please do not hesitate to contact me at +1 330-352-5281 or by email: david.colegrove@BakerHughes.com

Sincerely,



David G. Colegrove
Manager of Quality Assurance
Reuter Stokes, LLC

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

Rodrigo Martinez
Vice President, Reuter-Stokes, LLC

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NOTICE OF NONCONFORMANCE

Reuter-Stokes, LLC
8499 Darrow Road
Twinsburg, OH 44087

Docket No. 99901454
Report No. 2022-201

Based on the results of a U.S. Nuclear Regulatory Commission (NRC) inspection conducted at the Reuter-Stokes, LLC's (hereafter referred to as Reuter-Stokes) facility in Twinsburg, OH, from October 31 through November 4, 2022, Reuter-Stokes did not conduct certain activities in accordance with NRC requirements that were contractually imposed upon Reuter-Stokes by its customers or NRC licensees:

- A. Criterion VIII, "Identification and Control of Materials, Parts, and Components," 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," states that "Measures shall be established for the identification and control of materials, parts, and components, including partially fabricated assemblies. These measures shall assure that identification of the item is maintained by heat number, part number, serial number, or other appropriate means, either on the item or on records traceable to the item, as required throughout fabrication, erection, installation, and use of the item. These identifications and control measures shall be designed to prevent the use of incorrect or defective material, parts, and components."

Reuter-Stokes' Quality Assurance Manual Section 9.6, "Identification Maintenance," states, "Personnel who store, handle or process material or product are responsible for maintaining identification/markings while the material or product is under their control, including replacement of markings and identification records due to damage during handling or aging, and protection of identifications on items subject to excessive deterioration due to environmental exposure."

Contrary to the above, as of November 17, 2022, Reuter-Stokes failed to establish identification and control measures to prevent the use of incorrect material in safety-related components. Specifically, Reuter-Stokes failed to identify and use the correct spool of solder wire during a sensor & converter board assembly process. The correct solder material identified in the bill of material, P/N 213A7086P002, specifies 63% Sn (tin) and 37% Pb (lead), however, after X-ray fluorescence (XRF) analysis, the affected spool indicated a composition of approximately 99% Sn which may result in short circuits caused by electrically conductive crystalline structures of tin.

This issue has been identified as Nonconformance 99901454/2022-201-01.

Attachment A

In response to Nonconformance **99901454/2022-201-01**, Reuter-Stokes submits the following:

(1) Reason for the noncompliance

Reuter-Stokes determined that the apparent cause of the issue was that the technician did not verify the solder spool part number prior to use.

(2) Corrective steps that have been implemented and the results achieved

Reuter-Stokes initiated Corrective Action Request (CAR) 22-033 to address the identified nonconformance.

The following actions were taken:

- The affected solder spool was immediately removed from the Sensor and Converter board assembly process area and a properly identified solder spool was issued.
- All in-process upper level Sensor and Converter assemblies as well as subcomponent assemblies were placed on a Stop Work to prevent any further processing until the issue was resolved.
- A review of all solder workstations in the nuclear shop was performed to evaluate the extent of condition. No additional discrepancies were noted.
- An evaluation was performed in accordance with requirements in 10CFR21 for reporting of defects and noncompliance. The evaluation concluded that the issue was not a reportable condition.

(3) Corrective steps that will be taken to avoid further noncompliance

- Production travelers updated to include a step to verify solder part number prior to use.
- Training sessions conducted with team members to discuss the issue and any lessons learned.
- Annual audit established to monitor Sensor & Converter assembly process.

(4) Date when the corrective action will be completed

The above actions are complete.