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July 20<sup>th</sup>, 2023

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

**Subject:** Reply to a Notice of Nonconformance 99900227/2023-201

**Reference:** Docket Number: 99900227 Report Number: 2023-201

Dear Sir/Madam:

During a U.S. Nuclear Regulatory Commission (NRC) inspection conducted at Prysmian Group's facility in Willimantic, CT from May 22 – 26, 2023, a nonconformance was identified pertaining to our QA program which was not fully implemented; with respect to, the Control of Purchased Material, Equipment, and Services. The reply consists of (1) the reason for the noncompliance (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that will be taken to avoid further noncompliance; and (4) the date when the corrective actions will be completed. In accordance with the NRC Enforcement Policy, the response to this nonconformance is stated below.

1) Reason for the Noncompliance:

We were aware of the requirement to complete the survey; however, we weren't sure if it was to be done remotely or in-person. We completed in-person surveys for more critical suppliers.

Although, we read the NRC standard in-depth while trying to address the NUPIC's findings; however, we missed the in-person requirement to do all surveys.

2) Corrective Steps that have been taken and the Results Achieved:

- Contacted Phenix during the NRC inspection to schedule a visit to re-do the commercial-grade dedication (CGD) survey in-person.
- Survey is scheduled in-person on 7/25/2023.

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3) Corrective Steps that will be taken to avoid further Noncompliance:

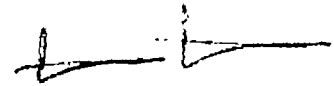
- All future new suppliers will be surveyed in-person, where required.
- QC-841A Revision 8 (August 1, 2022) – “Dedication of Commercial Grade Calibration/Testing Services for Safety-Related Applications” will be updated to ensure future suppliers will be covered correctly.

4) Date when Full Compliance will be achieved:

- The target date for full compliance is Friday, August 4<sup>th</sup>, 2023.

Please let me know if you require any further clarification.

Very Respectfully,



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CC: Chief, Quality Assurance and Vendor Inspection Branch, Division of Reactor Oversight,  
Office of Nuclear Reactor Regulation