



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

August 26, 2024

Mr. Marcus Alexander
President
Energy Steel and Supply Company
1785 Northfield Drive
Rochester Hills, MI 48309

SUBJECT: NUCLEAR REGULATORY COMMISSION VENDOR INSPECTION REPORT OF ENERGY STEEL AND SUPPLY COMPANY NO. 99902104/2024-201, AND NOTICE OF NONCONFORMANCE

Dear Mr. Alexander:

On July 8 - 12, 2024, the U.S. Nuclear Regulatory Commission (NRC) staff conducted an inspection at the Energy Steel and Supply Company's facility (hereafter referred to as ESSC) in Rochester Hills, MI. The purpose of this limited-scope routine inspection was to assess ESSC's compliance with the provisions of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 21, "Reporting of Defects and Noncompliance," and selected portions of Appendix B, "Quality Assurance Program Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities."

This technically-focused inspection specifically evaluated ESSC's implementation of quality activities associated with the design, fabrication, and testing of safety-related components (e.g., pumps, valves, heat exchangers, piping subassemblies, etc.) being supplied to U.S. nuclear power plants. In addition, the NRC inspection team evaluated ESSC's closure of the corrective actions initiated to address the inspection finding documented in the NRC's inspection report No. 99902104/2022-201, dated November 3, 2022 (Agencywide Documents Access and Management System (ADAMS) Accession No. (ML22297A256)). The enclosed report presents the results of this inspection. This NRC inspection report does not constitute NRC's endorsement of ESSC's overall quality assurance (QA) or 10 CFR Part 21 programs.

During this inspection, the NRC inspection team found that the implementation of your QA program did not meet certain regulatory requirements imposed on you by your customers or NRC licensees. Specifically, the NRC inspection team determined that ESSC was not fully implementing its QA program in the areas of identification and control of materials, parts, and components, measuring and test equipment, and corrective action. The specific findings and references to the pertinent requirements are identified in the enclosures to this letter. In response to the enclosed notice of nonconformance (NON), ESSC should document the results of the extent of condition review for these findings and determine if there are any effects on other safety-related components.

Please provide a written statement or explanation within 30 days of the date of this letter in accordance with the instructions specified in the enclosed NON. We will consider extending the response time if you show good cause for us to do so.

In accordance with 10 CFR 2.390, "Public inspections, exemptions, requests for withholding," of the NRC's "Rules of Practice," a copy of this letter, its enclosure(s), and your response will be made available electronically for public inspection in the NRC's Public Document Room or from the NRC's document system ADAMS, accessible at <http://www.nrc.gov/readingrm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information 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, then 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 safeguards information 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."

Sincerely,



Signed by Kavanagh, Kerri
on 08/26/24

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

Docket No.: 99902104

EPID No.: I-2024-201-0039

Enclosures:

1. Notice of Nonconformance
2. Inspection Report No. 99902104/2024-201
and Attachment

SUBJECT: NUCLEAR REGULATORY COMMISSION VENDOR INSPECTION REPORT OF ENERGY STEEL AND SUPPLY COMPANY NO. 99902104/2024-201, AND NOTICE OF NONCONFORMANCE DATE: August 26, 2024

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NRR-106

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DATE	8/12/2024	8/8/2024	8/12/2024
OFFICE	NRR/DNRL/NPHP	NRR/DRO/IRAB	NRR/DRO/IQVB
NAME	JHoncharik	BHughes	KKavanagh
DATE	8/7/2024	8/7/2024	8/26/2024

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NOTICE OF NONCONFORMANCE

Energy Steel and Supply Company
1785 Northfield Drive
Rochester Hills, MI 48309

Docket No. 99902104
Report No. 2024-201

Based on the results of a U.S. Nuclear Regulatory Commission (NRC) inspection conducted at the Energy Steel and Supply Company's (hereafter referred to as ESSC) facility in Rochester Hills, MI, from July 8, 2024 through July 12, 2024, ESSC did not conduct certain activities in accordance with NRC requirements that were contractually imposed upon ESSC 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 identification and control measures shall be designed to prevent the use of incorrect or defective material, parts, and components."

Paragraph 8.6.1.4 of ESSC's Nuclear Quality Assurance Manual (NQAM), Issue No. 8, Revision 2, dated November 30, 2023, states, in part, that "Material shall be marked to maintain identity and traceability throughout the welding process."

Contrary to the above, as of July 12, 2024, ESSC failed to maintain identification of items 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. Specifically, the filler metal rods used in the welding of safety-related letdown coolers was not identified and/or marked with a heat number or other appropriate means, but only had the material classification (i.e., 316L stainless steel) stamped on the metal rods. Further, this filler metal had been left opened in an uncontrolled area of the manufacturing floor since January 2024. Proper control of filler metal rods is necessary to assure that each heat of material is documented in the associated traveler/routing as well as to avoid contamination and the introduction of detrimental material to the final product which could cause degradation (i.e., cracking) that could potentially result in the component not performing its intended safety function.

This issue has been identified as Nonconformance 99902104/2024-201-01.

- B. Criterion XII, "Measuring and Test Equipment," of Appendix B to 10 CFR Part 50, states that "Measures shall be established to assure that tools, gages, instruments, and other measuring and testing devices used in activities affecting quality are properly controlled, calibrated, and adjusted at specified periods to maintain accuracy within necessary limits."

Paragraph 12.5.3 of ESSC's NQAM, states, in part, that "When measuring and test equipment is found to be lost, damaged, or found to be out of calibration, the [gage] is to be removed from service and reported to the Director, Quality Assurance [,] by issuance of a nonconformance report in accordance with Section 15 of this manual. An evaluation shall be performed to determine the effect of the out of calibration condition on previously inspected items and material back to the last valid calibration date."

Paragraph 6.5, "Out of Tolerance Conditions," of ESSC's procedure No. Q12.0, "Control of Measuring & Test Equipment," Revision 9, dated August 8, 2023, states, in part, that "When a M&TE/MS is lost, suspect of damage, or is found out-of-calibration, it will be removed from service, tagged with a Hold Tag and reported to Quality Assurance. Any item measured previously with the M&TE/MS will be evaluated for acceptability. Investigation of the suspect M&TE/MS will start from its last acceptable calibration."

Contrary to the above, as of July 12, 2024, ESSC failed to properly control measuring and testing devices used in activities affecting quality. Specifically, ESSC found a hexagon absolute arm measuring gage to be out of calibration and identified the safety-related jobs this gage was used on since its last acceptable calibration. However, ESSC did not perform an evaluation to determine the effect of the out of calibration condition on items that had been inspected and shipped since its last valid calibration date consistent with ESSC's NQAM.

This issue has been identified as Nonconformance 99902104/2024-201-02.

- C. Criterion XV, "Nonconforming Materials, Parts, or Components," of Appendix B to 10 CFR Part 50 states that "Measures shall be established to control materials, parts, or components which do not conform to requirements in order to prevent their inadvertent use or installation. These measures shall include, as appropriate, procedures for identification, documentation, segregation, disposition, and notification to affected organizations. Nonconforming items shall be reviewed and accepted, rejected, repaired or reworked in accordance with documented procedures."

Criterion XVI, "Corrective Action," of Appendix B to 10 CFR Part 50, states, in part, that "Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition."

Subsection 7.2.2 of ESSC's procedure No. Q15.0, "Nonconformance Reporting Procedure," Revision 3, dated May 27, 2021, states, in part, that "The Nonconformance (NC) reports found to be more than 30 business days of issue without schedule or reason require additional management actions to address prompt corrective action."

Subsection 6.2.3 of ESSC's procedure No. Q16.1, "Corrective Action Reporting

Procedure,” Revision 4, dated May 28, 2021, states, in part, that “Corrective Action/Preventative (CPA) reports found to be open for more than the scheduled completion (normally 30 business days of issue) without schedule or reason shall require immediate additional actions to address prompt corrective action.”

Contrary to the above, as of July 12, 2024, ESSC failed to disposition NCs in accordance with documented procedures and failed to promptly identify and correct significant conditions adverse to quality to ensure that the cause of the condition is determined and corrective action taken to preclude repetition. Specifically, ESSC failed to implement corrective actions to address Nonconformance 99902104/2022-201-01 as documented in CPA No. 1459 and in ESSC’s response to Nonconformance 99902104/2022-201-01, dated December 2, 2022 (Agencywide Documents Access and Management System Accession (ADAMS) No. ML22353A119). Because ESSC failed to adequately implement the corrective actions to address Nonconformance 99902104/2022-201-01, the NRC inspection team identified 22 NC and 25 CPA reports that were past the 30 business days due date as required in ESSC’s nonconformance and corrective action procedures Q15.0 and Q16.1, respectively. Three of the 22 NC reports and five of the 25 CPA reports have been opened for more than a year.

This issue has been identified as Nonconformance 99902104/2024-201-03.

Please provide a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001, with a copy to the Chief, Quality Assurance and Vendor Inspection Branch, Division of Reactor Oversight, Office of Nuclear Reactor Regulation, within 30 days of the date of the letter transmitting this Notice of Nonconformance. This reply should be clearly marked as a “Reply to a Notice of Nonconformance” and should include for each noncompliance: (1) the reason for the noncompliance or, if contested, the basis for disputing 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. Where good cause is shown, the NRC will consider extending the response time.

In accordance with the requirements of 10 CFR 2.390, “Public inspections, exemptions, requests for withholding,” of the NRC’s “Rule of Practice,” your response will be made available electronically for public inspection in the NRC’s Public Document Room or from the NRC’s document system (ADAMS), accessible from the NRC’s Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information 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, then 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 withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will 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 safeguards information 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.”

Dated this 26th day of August 2024.

**U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF NUCLEAR REACTOR REGULATION
DIVISION OF REACTOR OVERSIGHT
VENDOR INSPECTION REPORT**

Docket No.: 99902104

Report No.: 99902104/2024-201

Vendor: Energy Steel and Supply Company
1785 Northfield Drive
Rochester Hills, MI 48309

Vendor Contact: Mr. Marcus Alexander
President
Email: malexander@energysteel.com
Phone: (810) 538-4900

Nuclear Industry Activity: Energy Steel and Supply Company (hereafter referred to as ESSC) is an American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code N, NA, NPT, NS and NR Certificate Holder. ESSC's scope of supply includes ASME B&PV Code Class 1, 2, and 3 design, fabrication, and safety-related non-ASME Section III products and services for NRC's regulated facilities.

Inspection Dates: July 8 - 12, 2024

Inspectors: Yamir Diaz-Castillo NRR/DRO/IQVB Team Leader
Andrea Keim NRR/DRO/IQVB
Frankie Vega NRR/DRO/IQVB
Charlotte Ruley NRR/DRO/IQVB Trainee
John Honcharik NRR/DNRL/NPHP Technical Specialist

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

EXECUTIVE SUMMARY

Energy Steel and Supply Company
99902104/2024-201

The U.S. Nuclear Regulatory Commission (NRC) staff conducted a limited-scope routine vendor inspection at the Energy Steel and Supply Company's (hereafter referred to as ESSC) facility in Rochester Hills, MI, to verify that it had implemented an adequate quality assurance (QA) program that complies with the requirements 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," and 10 CFR Part 21, "Reporting of Defects and Noncompliance." Furthermore, the NRC inspection verified that ESSC had implemented a program in accordance with the applicable requirements of Section III, "Rules for Construction of Nuclear Facility Components," Section V, "Nondestructive Examination," and Section IX, "Welding and Brazing Qualification," of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code, and the American Society for Nondestructive Testing SNT-TC-1A, "Personnel Qualification and Certification in Nondestructive Testing." The NRC inspection team conducted this inspection on-site the week of July 8 - 12, 2024. This was the second NRC inspection of ESSC's facility in Rochester Hills, MI, and the third inspection of ESSC.

This technically-focused inspection specifically evaluated ESSC's implementation of quality activities associated with the design, fabrication, and testing of safety-related components (e.g., pumps, valves, heat exchangers, piping subassemblies, etc.) being supplied to U.S. nuclear power plants. In addition, the NRC inspection team evaluated ESSC's closure of corrective actions initiated to address the inspection finding documented in the NRC's inspection report (IR) No. 99902104/2022-201, dated November 3, 2022 (Agencywide Documents Access and Management System Accession No. ML22297A256).

Specific activities observed by the NRC inspection team included:

- receipt inspection of six long hex socket set screws with cup point per ASTM F912, "Standard Specification for Alloy Steel Socket Set Screws," zinc plated per ASTM B633, "Standard Specification for Electrodeposited Coatings of Zinc on Iron and Steel;"
- tungsten inert gas welding on the Heliflow letdown coolers for the Davis-Besse Nuclear Power Station, Unit 1; and
- calibration of two micrometers using calibration standard blocks.

These regulations served as the bases for the NRC inspection:

- Appendix B to 10 CFR Part 50
- 10 CFR Part 21

During this inspection, the NRC inspection team implemented Inspection Procedure (IP) 43002, "Routine Inspections of Nuclear Vendors," dated February 10, 2023; IP 43004, "Inspection of Commercial-Grade Dedication Programs," dated February 10, 2023; IP 36100, "Inspection of 10 CFR Part 21 and Programs for Reporting Defects and Noncompliance," dated February 10, 2023, and IP 71152, "Problem Identification and Resolution," dated October 31, 2023.

With the exception of nonconformances described below, the NRC inspection team concluded that ESSC's QA policies and procedures comply with the applicable requirements of Appendix B to 10 CFR Part 50 and 10 CFR Part 21, and that ESSC's personnel are implementing these policies and procedures effectively. The results of this inspection are summarized below.

Material Traceability

The NRC inspection team issued Nonconformance 99902104/2024-201-01 in association with ESSC's failure to implement the regulatory requirements of Criterion VII, "Identification and Control of Materials, Parts, and Components," of Appendix B to 10 CFR Part 50. Nonconformance 99902104/2024-201-01 cites ESSC for failing to maintain identification of items 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.

Control of Measuring and Test Equipment

The NRC inspection team issued Nonconformance 99902104/2024-201-02 in association with ESSC's failure to implement the regulatory requirements of Criterion XII, "Control of Measuring and Test Equipment," of Appendix B to 10 CFR Part 50. Nonconformance 99902104/2024-201-02 cites ESSC for failing to properly control measuring and testing devices used in activities affecting quality consistent with ESSC's Nuclear Quality Assurance Manual.

Nonconforming Materials, Parts, or Components and Corrective Action

The NRC inspection team issued Nonconformance 99902104/2024-201-03 in association with ESSC's failure to implement the regulatory requirements of Criterion XV, "Nonconforming Materials, Parts, or Components," and Criterion XVI, "Corrective Action," of Appendix B to 10 CFR Part 50. Nonconformance 99902104/2024-201-03 cites ESSC for failing to disposition NCs in accordance with documented procedures and for failing to promptly identify and correct significant conditions adverse to quality to ensure that the cause of the condition is determined, and corrective action taken to preclude repetition.

Safety Conscious Work Environment

The NRC inspection team concluded that ESSC's SCWE program and implementation were consistent with the NRC's guidance in IP 71152, "Problem Identification and Resolution," Appendix 1, "Guidance for Gathering SCWE and PI&R Insights." Based on the outcome of limited number of interviews conducted of selected individuals within the ESSC organization, the NRC inspection team determined that the ESSC staff are willing to raise nuclear safety concerns and the individual's perception of their management's responsiveness to these concerns was positive. The ESSC staff also indicated that they felt comfortable raising concerns to their supervisor and management, and elevating issues up through supervision or management if not appropriately addressed. The ESSC staff can enter issues directly into the corrective action program or nonconformance program.

Other Inspection Areas

The NRC inspection team determined that ESSC established its programs for design control, commercial-grade dedication, procurement document control, supplier oversight, control of special processes, and internal audits, in accordance with the applicable regulatory

requirements of Appendix B to 10 CFR Part 50. Based on the limited sample of documents reviewed and activities observed, the NRC inspection team also determined that ESSC is implementing its policies and procedures associated with these programs. In addition, the NRC inspection team determined that ESSC is implementing its 10 CFR Part 21 program for evaluating deviations and reporting defects that could create a substantial safety hazard in accordance with the applicable regulatory requirements. No findings of significance were identified in these areas.

REPORT DETAILS

1. Material Traceability

a. Inspection Scope

The NRC inspection team reviewed Energy Steel and Supply Company's (hereafter referred to as ESSC) policies and implementing procedures that govern the implementation of its material traceability program to verify compliance with the regulatory requirements of 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."

The NRC inspection team performed a walk-down of ESSC's manufacturing and assembly areas and reviewed a sample of four completed work packages associated with the following recently shipped safety-related items: (1) valve bonnet; (2) strainer; (3) gasket; and (4) a valve seal kit. The NRC inspection team reviewed the customer's purchase order (POs), job travelers, receiving tags, receipt inspection reports, and the Certified Material Test Reports (CMTRs) and/or Certificate of Conformances (CoCs) associated with these completed work orders. The NRC inspection team verified that traceability was maintained starting with the creation of the receiving tags and assignment of a unique ESSC identification number, and throughout the manufacturing process with the use of job travelers, and finally through shipment and the issuance of CoCs. For instances when specific items within these work orders were sent to suppliers on ESSC's Approved Vendors List (AVL) for machining and testing activities, ESSC's POs had specific instructions to ensure traceability was adequately maintained.

The NRC inspection team reviewed a sample receiving tags, receipt inspection reports, and job travelers associated with two shell casings located in ESSC's shop floor. These components are part of a safety-related heat exchanger currently being built at ESSC. The NRC inspection team confirmed that the physical markings in these components matched the original heat numbers in the job travelers and the heat numbers were traceable to the initial receiving tag.

The NRC inspection team also discussed the material traceability program with ESSC's management and technical staff. The attachment to this inspection report lists the documents reviewed and personnel interviewed by the NRC inspection team.

b. Observation and Findings

While observing safety-related welding on the Heliflow letdown coolers for Unit 1 of the Davis-Besse Nuclear Power Station, the NRC inspection team noted that the filler metal rods were not identified and/or marked with a heat number or another appropriate means, but only had the 316L stainless steel material classification stamped on the filler metal rods. The NRC inspection team also noted that the filler metal rods and the associated container have been issued to the welder since January 2024 and have been left in an uncontrolled area of the shop.

Section 8.6.1.4 of ESSC's Quality Assurance (QA) Manual, "Nuclear Quality Assurance Manual," Revision 2, dated November 30, 2023, states that "Material shall be marked to maintain identity and traceability throughout the welding process." In addition, paragraph 6.2.7 of ECCS's procedure WM-FMC, "Welding Program Manual Weld Filler Metal Control," Quality Management System," Revision 6, dated January 29, 2019, states that "Bare weld wire (rod and spooled), flux-cored electrodes, and consumable inserts shall be stored separately by AWS/ASME classification and need not be stored in heated ovens but shall be kept in a controlled, clean, dry area." Proper control of filler metal rods is necessary to assure that each heat of material is documented in the associated traveler as well as to avoid contamination and the introduction of detrimental material to the final product which could cause degradation (i.e., cracking) that could potentially result in the component not performing its intended safety function.

The NRC inspection team identified this issue as Nonconformance 99902104/2024-201-01 for ESSC's failure to maintain identification of items 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. ESSC initiated corrective/preventive action (CPA) report No. 1534 to address this issue.

c. Conclusion

The NRC inspection team issued Nonconformance 99902104/2024-201-01 in association with ESSC's failure to implement the regulatory requirements of Criterion VIII of Appendix B to 10 CFR Part 50. Nonconformance 99902104/2024-201-01 cites ESSC for failing to maintain identification of items 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.

2. Control of Measuring and Test Equipment

a. Inspection Scope

The NRC inspection team reviewed ESSC's policies and implementing procedures that govern the implementation of its measuring and test equipment (M&TE) program to verify compliance with the requirements of Criterion XII, "Control of Measuring and Test Equipment," of Appendix B to 10 CFR Part 50.

For a sample of M&TE, the NRC inspection team verified that the M&TE had the appropriate calibration stickers and current calibration dates, including the calibration due date. The NRC inspection team also verified that the M&TE had been calibrated, adjusted, and maintained at prescribed intervals prior to use. In addition, the NRC inspection team verified that the calibration certificates contained the following information: (1) as-found or as-left conditions; (2) accuracy required; (3) calibration results; (4) calibration dates; and (5) the due date for recalibration. Further, the NRC inspection team also verified that the selected M&TE was calibrated using procedures traceable to known industry standards.

The NRC inspection team observed the calibration of two micrometers for use in safety-related applications using calibration standard blocks. The NRC inspection team

confirmed that the calibration was done in accordance with ESSC's applicable calibration procedures and that the calibration blocks were adequately calibrated.

The NRC inspection team also discussed the M&TE program with ESSC's management and technical staff. The attachment to this inspection report lists the documents reviewed and personnel interviewed by the NRC inspection team.

b. Observations and Findings

During the review of ESSC's procedure No. Q12.0, "Control of Measuring & Test Equipment," Revision 9, dated August 8, 2023, the NRC inspection team noted that this procedure contains provisions for generating a nonconformance (NC) report when M&TE is found to be out of calibration. The purpose of generating an NC report is to perform an extent of condition to identify items that have been accepted using the M&TE since the last valid calibration date.

Upon review of a sample of open NCs, the NRC inspection team noted that ESSC found a hexagon absolute arm measuring gage to be out of calibration and identified the safety-related jobs this gage was used on since its last acceptable calibration. However, ESSC did not perform an evaluation to determine the effects of the out of calibration condition on items that had been inspected and shipped since its last valid calibration date consistent with ESSC's procedure No. Q12.0. The NRC inspection team identified this issue as Nonconformance 99902104/2024-201-02 for ESSC's failure to properly control and calibrate measuring and testing devices used in activities affecting quality. ESSC initiated CPA report No. 1535 to address this issue.

c. Conclusion

The NRC inspection team issued Nonconformance 99902104/2024-201-02 in association with ESSC's failure to implement the regulatory requirements of Criterion XII of Appendix B to 10 CFR Part 50. Nonconformance 99902104/2024-201-02 cites ESSC for failing to properly control measuring and testing devices used in activities affecting quality consistent with ESSC's Nuclear Quality Assurance Manual.

3. Nonconforming Materials, Parts, or Components and Corrective Action

a. Inspection Scope

The NRC inspection team reviewed ESSC's policies and implementing procedures that govern the implementation of its nonconformances and corrective actions to verify compliance with the requirements of Criterion XV, "Nonconforming Materials, Parts, or Components," and Criterion XVI, "Corrective Action," of Appendix B to 10 CFR Part 50.

The NRC inspection team reviewed a sample of NC reports to verify that ESSC: (1) dispositioned the NCs in accordance with the applicable procedures; (2) documented an appropriate technical justification for various dispositions; and (3) took adequate corrective action with regard to the nonconforming items. In addition, the NRC inspection team confirmed that the nonconformance process provides a link to the 10 CFR Part 21, "Reporting of Defects and Noncompliance," program.

The NRC inspection team reviewed a sample of CPA reports and confirmed that CPA reports provide a link to the 10 CFR Part 21 program. The NRC inspection team also reviewed ESSC's corrective actions initiated in response to Nonconformance 99902104/2022-201-01, identified in the NRC's Inspection Report (IR) No. 99902104/2022-201, dated November 3, 2022 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML22297A256).

The NRC inspection team also discussed the nonconforming materials, parts, or components and corrective action programs with ESSC's management and technical staff. The attachment to this inspection report lists the documents reviewed and personnel interviewed by the NRC inspection team.

b. Observations and Findings

Corrective Actions Associated with Nonconformance 99902104/2022-201-01

Following the September 2022 inspection of ESSC as documented in IR No. 99902104/2022-201, the NRC issued Nonconformance 99902104/2022-201-01 for ESSC's failure to adequately implement its corrective action program. Specifically, the NRC inspection team identified that ESSC failed to implement corrective actions to address Nonconformance 99901098/2009-201-01. Because ESSC failed to implement corrective actions to address Nonconformance 99901098/2009-201-01, the NRC inspection team identified two NC reports and 13 CPA reports that were past the 30 business days due date as required by ESSC's nonconformance and corrective action procedures.

In its response dated December 2, 2022 (ADAMS Accession No. ML22353A119) to address Nonconformance 99902104/2022-201-01, ESSC stated that the reason for the noncompliance was because periodic meetings to review NC and CPA reports had been implemented but were discontinued at some point in the past. In addition, Project Manager and Engineer positions that were open long-term as a consequence of ESSC's relocation from Lapeer, MI, further contributed to resources being insufficient for addressing both NCs and CPAs in a timely manner.

The ESSC response also stated that a standing daily Material Review Board (MRB) had been implemented to review all the open NC reports and drive them to resolution. This MRB would transition to be a part of the process for each project management team. Further, a weekly standing meeting focused on CPA reports had been implemented with members of ESSC's management team to provide time to review past due items, work on the CPA reports themselves, and make plans for more in-depth work and resource allocation to resolve problematic CPA reports. Lastly, ESSC would task a QA specialist with supporting resolution of open NC and CPA reports, receive training in root-cause analysis and problem-solving to function as a facilitator for both NC reports for the project teams and for resolution of CPA reports.

During this inspection, the NRC inspection team identified that ESSC did not: (1) effectively transferred the MRB to the project management teams; (2) continue to consistently hold the weekly CPA meetings; and (3) assign the QA specialist to support the resolution of NC and CPA reports. Due to ESSC's failure to implement the corrective actions to address Nonconformance 99902104/2022-201-01, the NRC inspection team identified an additional 22 NC and 25 CPA reports that were past the 30 business days

due date as required in ESSC's nonconformance and corrective action procedures. Three of the 22 NC reports and five of the 25 CPA reports have been opened for more than a year. The NRC inspection team determined that ESSC's failure to implement an effective NC and CPA programs based on two NRC vendor inspections as a significant condition adverse to quality.

The NRC inspection team identified this issue as Nonconformance 99902104/2024-201-03 for ESSC's failure to promptly identify and correct significant conditions adverse to quality to ensure that the cause of the condition is determined and corrective action taken to preclude repetition. ESSC initiated CPA report No. 1529 to address this issue.

c. Conclusion

The NRC inspection team issued Nonconformance 99902104/2024-201-03 in association with ESSC's failure to implement the regulatory requirements of Criterion XV and Criterion XVI of Appendix B to 10 CFR Part 50. Nonconformance 99902123/2024-201-03 cites ESSC for failing to disposition NCs in accordance with documented procedures and failing to promptly identify and correct significant conditions adverse to quality to ensure that the cause of the condition is determined, and corrective action taken to preclude repetition.

4. Design Control

a. Inspection Scope

The NRC inspection team reviewed ESSC's policies and implementing procedures that govern the implementation of its design control program to verify compliance with the regulatory requirements of Criterion III, "Design Control," of Appendix B to 10 CFR Part 50.

The NRC inspection team reviewed a sample of design documents including POs, design specification reports, and design drawings. The NRC inspection team reviewed the design packages for two safety-related work orders for a Y-Strainer for Comanche Peak Nuclear Power Plant and a Heliflow heat exchanger for Duke Energy.

The NRC inspection team reviewed the Design Specification Review and Design Report Review forms for the Y-Strainer and Heliflow heat exchanger. ESSC used Design Specification Review forms to review and approve the design specifications and technical requirements specified in the customer's POs. Design analysis activities, which included the interpretation of design specifications and the development of design reports, are performed by independent design organizations qualified by ESSC and maintained in ESSC's AVL. These design reports are then reviewed by ESSC, and the review is documented in a Design Report Review form. The Design Report Review forms are used to ensure that all the design inputs are addressed and correctly documented.

The NRC inspection team confirmed that the design requirements and specifications, included in the POs associated with these two work orders, were adequately translated into detailed drawings, instructions, and procedures, as applicable. The NRC inspection team evaluated the use of the Design Specification Review and Design Report Review

forms and the how design changes are controlled and approved. ESSC used the Engineering Change Notice process to initiate, document, and track design changes.

The NRC inspection team concluded that: (1) ESSC's design control process was being adequately implemented in accordance with the applicable regulatory requirements; (2) ESSC had correctly translated the design information into the applicable specifications, drawings, procedures, and instructions; and that (3) design activities were effectively controlled by documented instructions and procedures.

The NRC inspection team also discussed the design control program with ESSC's management and technical staff. The attachment to this inspection report lists the documents reviewed and personnel interviewed by the NRC inspection team.

b. Observations and Findings

No findings of significance were identified.

c. Conclusion

The NRC inspection team concluded that ESSC is implementing its design control program in accordance with the regulatory requirements of Criterion III of Appendix B to 10 CFR Part 50. Based on the limited sample of documents reviewed, the NRC inspection team also determined that ESSC is implementing its policies and procedures associated with the design control program. No findings of significance were identified.

5. Commercial-Grade Dedication

a. Inspection Scope

The NRC inspection team reviewed ESSC's policies and implementing procedures that govern the implementation of its commercial-grade dedication (CGD) program to verify their compliance with the regulatory requirements of Criterion III and Criterion VII, "Control of Purchased Material, Equipment, and Services," of Appendix B to 10 CFR Part 50.

The NRC inspection team reviewed ESSC's program for the dedication of commercial-grade items for use in safety-related applications to verify its compliance with the applicable regulatory requirements. This assessment included a review of the policies and procedures governing the implementation of CGD activities, interviews with ESSC's personnel, and review of related documentation. ESSC's CGD process consisted of developing CGD plans that included: (1) technical evaluation; (2) part identification; (3) safety functions; (4) credible failure mechanisms; (5) critical characteristics and verification methods for acceptance. The NRC inspection team reviewed a sample of CGD packages for the following components: (1) 2-inch flanged ball valve; (2) rectangular seal disc; and (3) a connecting rod nut. Within these CGD packages, the NRC inspection team reviewed: (1) POs; (2) technical evaluations; (3) checklists; (4) inspection and test reports; and (5) CoCs. The NRC inspection team evaluated the criteria for the identification of item functions, credible failure mechanisms/modes, selection of critical characteristics and acceptance criteria, identification of verification methods and justification of the sampling methodologies, as applicable. The NRC

inspection team confirmed that ESSC's CGD process provided reasonable assurance that the items and services being dedicated would perform their intended safety function.

The NRC inspection team reviewed ESSC's measures for using the International Laboratory Accreditation Cooperation accreditation process in lieu of performing commercial-grade surveys for the procurement of calibration and testing services as part of the CGD process. ESSC implements this process as described in the Nuclear Energy Institute document No. 14-05A, "Guidelines for the Use of Accreditation in Lieu of Commercial Grade Surveys for Procurement of Laboratory Calibration and Test Services," Revision 1, dated September 2020, which was recognized for use by the NRC in a safety evaluation dated November 23, 2020 (Agencywide Documents Access Management System Accession (ADAMS) No. ML20322A019).

The NRC inspection team also discussed the CGD program with ESSC's management and technical staff. The attachment to this inspection report lists the documents reviewed and personnel interviewed by the NRC inspection team.

b. Observations and Findings

No findings of significance were identified.

c. Conclusion

The NRC inspection team concluded that ESSC is implementing its CGD program in accordance with the regulatory requirements of Criterion III and Criterion VII of Appendix B to 10 CFR Part 50. Based on the limited sample of documents reviewed, the NRC inspection team also determined that ESSC is implementing its policies and procedures associated with the CGD program. No findings of significance were identified.

6. Supplier Oversight

a. Inspection Scope

The NRC inspection team reviewed ESSC's policies and implementing procedures that govern the implementation of its supplier oversight program to verify compliance with the requirements of Criterion IV, "Procurement Document Control," and Criterion VII of Appendix B to 10 CFR Part 50. The NRC inspection team reviewed a sample of POs, ESSC's AVL, supplier audit reports, and annual evaluations.

For the review of the sample of POs, the NRC inspection team verified the POs included, as applicable: (1) the scope of work; (2) right of access to the suppliers' facilities; (3) extension of contractual requirements to sub-suppliers; (4) and the applicable technical, regulatory, and quality requirements.

The NRC inspection team also reviewed a sample of audit reports and verified that the audits reports included, as applicable: (1) an audit plan; (2) any findings identified and the associated corrective actions; (3) adequate documented objective evidence of compliance with the applicable requirements; and (4) a documented review by ESSC's responsible management. For the review of the annual evaluations, the NRC inspection team confirmed they included the information required by ESSC's policies and procedures. In addition, the NRC inspection team also verified that the audits were

performed in accordance with the established frequency and by qualified lead auditors and auditors. Furthermore, the NRC inspection team reviewed the training and qualification records of lead auditors and auditors and confirmed that auditing personnel had completed all the required training and had maintained the applicable qualification and certification in accordance with ESSC's policies and procedures.

The NRC inspection team observed the receipt inspection of six long hex socket set screws with cup point per ASTM F912, "Standard Specification for Alloy Steel Socket Set Screws," zinc plated per ASTM B633, "Standard Specification for Electrodeposited Coatings of Zinc on Iron and Steel." The NRC inspection team verified that the inspection was performed in accordance with ESSC's policies and procedures, using calibrated gages, and performed by a qualified Quality Control inspector.

The NRC inspection team also discussed the supplier oversight program with ESSC's management and technical staff. The attachment to this inspection report lists the documents reviewed and personnel interviewed by the NRC inspection team.

b. Observations and Findings

No findings of significance were identified.

c. Conclusion

The NRC inspection team concluded that ESSC is implementing its supplier oversight program in accordance with the regulatory requirements of Criterion IV and Criterion VII of Appendix B to 10 CFR Part 50. Based on the limited sample of documents reviewed, the NRC inspection team also determined that ESSC is implementing its policies and procedures associated with the supplier oversight program. No findings of significance were identified.

7. Control of Special Processes

a. Inspection Scope

The NRC inspection team reviewed ESSC's policies and implementing procedures that govern the implementation of its control of special processes program to verify compliance with the regulatory requirements of Criterion IX, "Control of Special Processes," of Appendix B to 10 CFR Part 50, and with the applicable requirements of Section III, "Rules for Construction of Nuclear Facility Components," Section V, "Nondestructive Examination," and Section IX, "Welding and Brazing Qualification," of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, and the American Society for Nondestructive Testing (ASNT) SNT-TC-1A, "Personnel Qualification and Certification in Nondestructive Testing."

For manufacturing activities, the NRC inspection team reviewed a sample of ASME B&PV Code Data Reports, shop travelers, work instructions, and the calibration certificates of the M&TE. For non-destructive examination (NDE) activities, the NRC inspection team reviewed the procedures for magnetic particle testing (MT) and liquid penetrant testing (PT), as well as MT and PT reports, MT and PT inspector qualifications, and ultrasonic testing inspector qualifications, and the calibration certificates of the welding equipment.

Welding

The NRC inspection team observed tungsten inert gas welding on the Heliflow letdown coolers for the Davis-Besse Nuclear Power Station, Unit 1. The NRC inspection team verified that the welding procedure specification was qualified in accordance with the requirements Sections III and IX of the ASME B&PV Code, using the supporting procedure qualification records and the applicable ESSC procedures. The NRC inspection team also verified that the welder was adequately qualified to perform the work on the ASME B&PV Code item.

Control of Weld Material

The NRC inspection team reviewed ESSC's process for storing and issuing weld material. Please refer to the Material Traceability section above for the issue identified with the traceability and control of weld filler metal.

Nondestructive Examination

The NRC inspection reviewed a sample of NDE reports from ASME B&PV Code Data Reports and confirmed that the examinations were performed by qualified personnel using qualified procedures in accordance with the applicable requirements of Section III and Section V of the ASME B&PV Code and ASNT SNT-TC-1A. The NRC inspection team also verified that the NDE reports included all the inspection results with the associated inspector and inspection procedures.

ASME B&PV Code Data Reports

The NRC inspection team reviewed a sample of ASME B&PV Code Data Reports and confirmed that they contained all of the required documentation such as the associated weld data reports, weld travelers, and the NDE reports in accordance with the requirements of Section III of the ASME B&PV Code. The NRC inspection team also confirmed that the welding and NDE documented in the ASME B&PV Code Data Reports were performed by trained and qualified personnel in accordance with ESSC's procedures and Sections III and IX of the ASME Code and ASNT SNT-TC-1A, as applicable.

The NRC inspection team discussed the control of special processes program with ESSC's management and technical staff. The attachment to this inspection report lists the documents reviewed and personnel interviewed by the NRC inspection team.

b. Observation and Findings

No findings of significance were identified.

c. Conclusion

The NRC inspection team concluded that ESSC is implementing its control of special processes program in accordance with the regulatory requirements of Criterion IX of Appendix B to 10 CFR Part 50. Based on the limited sample of documents reviewed, the NRC inspection team also determined that ESSC is implementing its policies and

procedures associated with the control of special processes program. No findings of significance were identified.

8. Internal Audits

a. Inspection Scope

The NRC inspection team reviewed ESSC's policies and implementing procedures that govern the implementation of its internal audits program to verify compliance with the requirements of Criterion XVII, "Audits," of Appendix B to 10 CFR Part 50.

The NRC inspection team reviewed a sample of ESSC's internal audit reports performed in 2021, 2022, and 2023. The NRC inspection team verified that ESSC's procedure described the scope and purpose of audits to be performed, the frequency, audit criteria, and corrective actions when required. For the sample of internal audits reviewed, the NRC inspection team verified that the audit reports included: (1) an audit plan; (2) the audit results; (3) adequately documented objective evidence with the applicable requirements; and (4) a review by ESSC's responsible management. The NRC inspection team verified that the internal audits were performed by qualified auditors who were not auditing their own work and that the internal audits were performed using the appropriate checklists.

The NRC inspection team also discussed the internal audits program with ESSC's management and technical staff. The attachment to this inspection report lists the documents reviewed and personnel interviewed by the NRC inspection team.

b. Observations and Findings

The NRC inspection team noted that two observations identified as part of the 2023 internal audit were not entered into ESSC's corrective action program. Upon further discussion with ESSC's, the NRC inspection team learned that ESSC had already opened CAR No. 1513 to address the two observations.

c. Conclusion

The NRC inspection team concluded that ESSC is implementing its internal audits program in accordance with the regulatory requirements of Criterion XVII of Appendix B to 10 CFR Part 50. Based on the limited sample of documents reviewed, the NRC inspection team also determined that ESSC is implementing its policies and procedures associated with the internal audits program. No findings of significance were identified.

9. 10 CFR Part 21 Program

a. Inspection Scope

The NRC inspection team reviewed ESSC's policies and implementing procedures that govern the implementation of its 10 CFR Part 21 program to verify compliance with the regulatory requirements. In addition, the NRC inspection team evaluated the 10 CFR Part 21 postings and a sample of ESSC's POs for compliance with the requirements of 10 CFR 21.6, "Posting requirements," and 10 CFR 21.31, "Procurement documents."

Furthermore, for a sample of 10 CFR Part 21 evaluations performed by ESSC, the NRC inspection team verified that ESSC had effectively implemented the requirements for evaluating deviations and failures to comply. The NRC inspection team verified that the notifications were performed in accordance with the requirements of 10 CFR 21.21, as applicable.

The NRC inspection team also discussed the 10 CFR Part 21 program with ESSC's management and technical staff. The attachment to this inspection report lists the documents reviewed and personnel interviewed by the NRC inspection team.

b. Observations and Findings

No findings of significance were identified.

c. Conclusion

The NRC inspection team concluded that ESSC is implementing its 10 CFR Part 21 program in accordance with the regulatory requirements of 10 CFR Part 21. Based on the limited sample of documents reviewed, the NRC inspection team also determined that ESSC is implementing its policies and procedures associated with the 10 CFR Part 21 program. No findings of significance were identified.

10. Safety Conscious Work Environment

a. Inspection Scope

The NRC inspection team reviewed ESSC's policy that governs the implementation of its safety conscious work environment (SCWE) program. The NRC inspection team interviewed a total of 13 personnel from different departments regarding the SCWE at ESSC. Across the board, all ESSC personnel interviewed feel free to raise nuclear or industrial safety concerns through all avenues.

The NRC inspection team also discussed the SCWE program with ESSC's management and technical staff. The attachment to this inspection report lists the documents reviewed by the NRC inspection team.

b. Observations and Findings

During the review of ESSC's "Safety Conscious Work Environment (SCWE) Policy," Revision 1, dated November 2019, the NRC inspection team noted that Section 6.1, "Self-Assessment," states that "Energy Steel will conduct a self-assessment yearly to determine that the SCWE guidelines are being followed, and that our employees are provided the safest workplace possible. Upon further discussion with ESSC's staff, the NRC inspection team learned that the SCWE self-assessment has not been performed. The NRC inspection team determined this issue to be minor because it did not find any issues with ESSC's implementation of its SCWE. ESSC initiated CAR No. 1527 to address this issue.

c. Conclusion

The NRC inspection team concluded that ESSC's staff appear to be comfortable raising and pursuing issues with their supervisors and ESSC's upper management. As such, the NRC inspection team determined that the SCWE at ESSC was adequate.

11. Entrance and Exit Meetings

On July 8, 2024, the NRC inspection team discussed the scope of the inspection with Mr. Marcus Alexander, ESSC's President, and other members of ESSC's management and technical staff. On July 12, 2024, the NRC inspection team presented the inspection results and observations during an exit meeting with Mr. Alexander and other members of ESSC's management and technical staff. The attachment to this report lists the attendees of the entrance and exit meetings, as well as those individuals whom the NRC inspection team interviewed.

ATTACHMENT

1. ENTRANCE/EXIT MEETING ATTENDEES

Name	Title	Affiliation	Entrance	Exit	Interviewed
Marcus Alexander	President	Energy Steel & Supply Company (ESSC)	X	X	X
Brook Morris	Director of Operations	ESSC	X	X	X
Brian Baxter	Director of Quality	ESSC	X	X	X
Nathan Goldsmith	Engineering Manager	ESSC	X		X
Dan Dixon	Shop Foreman	ESSC	X	X	X
Pierre Goyette	Quality Control (QC) Inspector	ESSC			X
Tracy Smith	Quality Assurance (QA) Specialist	ESSC			X
Vera Aladjova	QA/QC Inspector	ESSC			X
Steve Simoski	QA/QC Engineer	ESSC			X
Robert J. Paton	Nuclear QA Program Consultant and Lead Auditor	ESSC		X	X
Zack Robinson	Welder/Fabricator	ESSC			X
Ron Chiotti	Maintenance	ESSC			X
Richard Brooks	Machinist	ESSC			X
Michael Thiel	Welder/Floor Lead	ESSC			X
Lyle Goldorf	Shipping/Receiving	ESSC			X
Mark D. Wilson	Authorized Nuclear Inspector	Hartford Steam Boiler			X
Yamir Diaz-Castillo	Inspection Team Leader	Nuclear Regulatory Commission (NRC)	X	X	
Deanna Zhang*	Acting Branch Chief	NRC		X	

Name	Title	Affiliation	Entrance	Exit	Interviewed
Andrea Keim	Inspector	NRC	X	X	
Frankie Vega	Inspector	NRC	X	X	
John Honcharik	Technical Specialist	NRC	X	X	
Charlotte Ruley	Inspector in Training	NRC	X	X	

*Via telephone

2. INSPECTION PROCEDURES USED

- Inspection Procedure (IP) 36100, "Inspection of 10 CFR Part 21 and Programs for Reporting Defects and Noncompliance," dated February 10, 2023
- IP 43002, "Routine Inspections of Nuclear Vendors," dated February 10, 2023
- IP 43004, "Inspection of Commercial-Grade Dedication Programs," dated February 10, 2023

3. LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Item Number	Status	Type	Description
99902104/2024-201-01	OPENED	NON	Criterion VIII
99902104/2024-201-02	OPENED	NON	Criterion XII
99902104/2024-201-03	OPENED	NON	Criterion XVI
99902104/2022-201-01	DISCUSSED	NON	Criterion XVI

4. DOCUMENTS REVIEWED

Policies and Procedures

- Energy Steel and Supply Company's (ESSC) Nuclear Quality Assurance (QA) Manual, Issue No. 8, Revision 2, dated November 30, 2023
- QA Q Procedures Table of Contents, Revision 139, dated May 30, 2024
- Q02.1, "Quality Inspector Qualification Procedure," Revision 5, dated January 26, 2024
- Q2.2, "QA Specialist Training and Qualification Procedure," Revision 3, dated April 15, 2021
- Q2.3, "Auditor and Lead Auditor Qualification Procedure," Revision 6, dated March 17, 2023

- Q2.4, "Certifying Engineer (RPE) Qualification Procedure," Revision 2, dated May 17, 2021
- Q2.5, "Qualification of Personnel for Certifying Welding Qualification Documents (In accordance with ASME Code Section IX, QG-106)," Revision 0, dated September 15, 2020
- Q3.1, "Job/Contract Review Procedure," Revision 3, dated May 21, 2021
- Q3.3, "Design Control of Customer Designed Components Fabricated by Energy Steel and Supply Company," Revision 1, dated February 19, 2016
- Q3.5, "Process Controls for Legacy Manufacturers," Revision 4, dated March 14, 2023
- Q3.7, "Design Report Review," Revision 0, dated December 12, 2018
- Q5.1, "Procedure for Development and Control of Energy Steel Drawings," Revision 8, dated May 14, 2019
- Q5.2, "Dev. & Control of ESSC Jobs and Shop Traveler," Revision 4, dated June 2, 2021
- Q7.1, "Receipt Inspection Procedure," Revision 5, dated May 21, 2021
- Q7.2, "Commercial Grade Dedication," Revision 11, dated July 29, 2019
- Q7.3, "Control of Subcontracted Services," Revision 4, dated April 11, 2023
- Q7.4, "Approved Vendors List Procedure," Revision 6, dated January 26, 2024
- Q7.5, "Control of Customer Supplied Items & Material Procedure," Revision 0, dated August 16, 1996
- Q7.6, "Vendor Ratings Procedure," Revision 1, dated April 8, 2023
- Q8.1, "Marking ASME Section III Material for Shipment," Revision 1, dated June 1, 2021
- Q8.2, "Identification and Control of Disassembly Parts," Revision 0, dated February 27, 2004
- Q8.3, "Stock Return Process," Revision 0, dated February 8, 2016
- Q8.4, "Traceability Verification," Revision 0, dated October 11, 2021
- Q9.1, "Control of Special Processes," Revision 1, dated August 19, 2019
- Q9.15, "Solution Annealing of Austenitic Stainless Steel," Revision 0, dated March 23, 2023
- Q10.3, "Final Inspection Procedure," Revision 1, dated May 27, 2021

- Q12.0, "Control of Measuring & Test Equipment," Revision 9, dated August 8, 2023
- Q12.1, "Calibration of Micrometers, Calipers and Indicators," Revision 9, dated December 18, 2006
- Q12.10, "Calibration of Welding Power Sources," Revision 1, dated January 4, 2012
- Q13.1, "Cleaning, Handling, Storage, Packaging & Shipping," Revision 6, dated May 27, 2021
- Q15.0, "Nonconformance Reporting Procedure," Revision 3, dated May 27, 2021
- Q15.1, "Reporting of Defects Procedure (10 CFR Part 21 Evaluation and Reporting)," Revision 10, dated April 10, 2023
- Q15.2, "Material/Item Return Authorization Procedure," Revision 5, dated April 12, 2013
- Q16.1, "Corrective Action Reporting Procedure," Revision 4, dated May 28, 2021
- Q18.1, "Internal Audit Procedure," Revision 4, dated June 7, 2021
- Q18.3, "Management Review Procedure," Revision 4, dated June 7, 2021
- Accuren Procedure No. QCP-1, "Written Practice for the Qualification and Certification of NDT Personnel (SNT-TC-1a)," Revision 4, dated January 15, 2024
- "Safety Conscious Work Environment Policy," Revision 1, dated November 2019
- New Employee Training Slides, "Nuclear Codes & Standards - QA Program Status Levels, 10CFR21, 10CFR50 Appendix B, ASME BPVC/NBIC," by Marcus Alexander, dated June 2024
- Employee Quarterly Training for June 2024
- ESSC's QA Program Status and Adequacy Report for FY2021, dated September 30, 2021
- ESSC's QA Program Status and Adequacy Report for FY2022, dated April 11, 2023
- ESSC's QA Program Status and Adequacy Report for FY2023, dated April 4, 2024

Design and Commercial-Grade Dedication

- American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code Data Report for a strainer kit, serial No. NPT45030-2, dated April 11, 2024
- ASME B&PV Code Data Report for a heat exchanger, serial Nos. N43702-1 and N43702-2, dated November 4, 2022

- ASME B&PV Code Data Report for a cover assembly, serial Nos. NPT44961-1, NPT44961-2, and NPT44961-3, dated May 15, 2024
- ASME B&PV Code Data Report for a shell, seal injection water cooler, serial No. NPT45235-1, dated November 1, 2023
- ASME B&PV Code Data Report for an emergency diesel generator fuel oil transfer pump serial No. N43489-1, dated September 21, 2022
- Commercial-Grade Item Dedication (CGID) Plan No. Cal/Vend 17025 for gage ID No. PPG001, Revision 0, dated March 1, 2023
- CGID Plan No. Cal/Vend 17025 for gage ID No. ARM001, Revision 1, dated June 18, 2024
- CGID Plan No. Cal/Vend 17025 for gage ID No. PRG013, Revision 0, dated March 1, 2023
- CGID Plan No. 45286 for a ball valve, Revision 4, dated September 27, 2023
- CGID Plan No. 45258 for a connecting rod nut, Revision 0, dated June 7, 2023
- CGID Plan No. 44898 for a rectangular seal disc, Revision 2, dated April 10, 2023
- Commercial-Grade Survey Report No. 2594-2024-1, survey date: April 15 - 16, 2024
- Design Specification No. 2323-MS-29A, Revision 1, dated September 7, 1976
- Design Specification Review Form for Design Specification No. K2801, dated January 23, 2020
- Design Specification Review Form for Design Specification No. OSS-0201.00-00-002, dated February 17, 2023
- Design Specification Review Form for Job No. 43117, dated April 5, 2018
- Design Report Review Form for Job No. 41640 dated October 3, 2016
- Design Report Review Form for Job No. 43117, dated January 4, 2023
- Drawing No. 2693 for a Y strainer body, dated December 21, 2022

Welding and Nondestructive Examination (NDE) Records

- WM-GPS, "Welding Program Manual General Purging Standard," Revision 1, dated March 12, 2019
- WM-FMC, "Welding Program Manual Weld Filler Metal Control," Revision 6, dated January 19, 2019

- NDE-PQC-01, "Qualification & Certification of Nondestructive Examination Personnel," Revision 13, dated April 3, 2024
- NDE-VT-01, "Visual Weld Inspection Procedure," Revision 15, dated March 23, 2021
- NDE-PT-VSR-01, "Liquid Penetrant (Solvent Removable) Testing," Revision 20, dated June 5, 2019
- Welding Procedure Specification No. A0808-TM.NNI, "GTAW Welding Stainless Steel," Revision 4, dated April 24, 2024
- Procedure Qualification Record (PQR) No. 0806, "Qualification of Stainless Steel Weld Joint," Revision 0, dated July 9, 2015
- PQR No. 0808-1, "Qualification of Stainless Steel Weld Joint," Revision 0, dated September 12, 2014
- PQR No. 0808-3, "Qualification of Stainless Steel Weld Joint," Revision 0, dated November 19, 2014
- Visual Weld Inspection Report for Traveler No. 45030ARW, dated April 5, 2024
- Visual Weld Inspection Report for N43702-1-A01, dated March 17, 2022
- Visual Weld Inspection Report for N43702-1-A01, dated March 15, 2022
- Visual Weld Inspection Report for N43702-2, dated January 22, 2021
- Visual Weld Inspection Report for N43702-2, dated January 25, 2021
- Visual Weld Inspection Report for NPT44961-1, dated May 10, 2024
- Visual Weld Inspection Report for NPT44961-2, dated May 10, 2024
- Visual Weld Inspection Report for NPT44961-3, dated May 10, 2024
- Visual Weld Inspection Report for N43702-1-A01, dated November 25, 2020
- Visual Weld Inspection Report for NPT44961-1, dated May 15, 2024
- Visual Weld Inspection Report for NPT44961-2, dated May 15, 2024
- Visual Weld Inspection Report for NPT44961-3, dated May 15, 2024
- Visual Weld Inspection Report for NPT45235-1, dated October 24, 2023
- Visual Weld Inspection Report for NPT45235-1, dated October 30, 2023
- Visual Weld Inspection Report for N43489-1, dated March 3, 2022

- Visual Weld Inspection Report for N43489-1, dated January 17, 2022
- Visual Weld Inspection Report for N43489-1, dated July 23, 2021
- Liquid Penetrant (PT) Examination Report for No. Traveler 45030ARW, dated April 5, 2024
- PT Examination Report for N43702-1, dated June 9, 2022
- PT Examination Report for N43702-1-A01, dated March 28, 2022
- PT Examination Report for N43702-1-A01, dated March 15, 2022
- PT Examination Report for N43702-2, dated January 22, 2021
- PT Examination Report for N43702-1-A01, dated January 26, 2021
- PT Examination Report for N43702-2, dated January 26, 2021
- PT Examination Report for NPT44961-1, dated May 10, 2024
- PT Examination Report for NPT44961-2, dated May 10, 2024
- PT Examination Report for NPT44961-3, dated May 10, 2024
- PT Examination Report for NPT44961-1-A01, dated May 26, 2024
- PT Examination Report for NPT44961-2-A01, dated May 26, 2024
- PT Examination Report for NPT44961-3-A01, dated May 26, 2024
- PT Examination Report for NPT44961-1, dated May 15, 2024
- PT Examination Report for NPT44961-2, dated May 15, 2024
- PT Examination Report for NPT44961-3, dated May 15, 2024
- PT Examination Report for NPT45235-1, dated October 30, 2023
- PT Examination Report for NPT45235-1, ANO1, dated October 30, 2023
- PT Examination Report for N43489-1, dated March 3, 2022
- PT Examination Report for N43489-1, dated July 23, 2021

Calibration, Inspection, and Test Records

- Certificate of Calibration No. 399735-50786, Revision 1, dated November 29, 2023

- Certificate of Calibration No. 399735-50790, Revision 1, dated November 29, 2023
- Certificate of Calibration No. 399735-50793, Revision 1, dated November 29, 2023
- Certificate of Calibration No. 399735-50787, Revision 1, dated November 30, 2023
- Certificate of Calibration No. 399735-50789, Revision 1, dated November 30, 2023
- Certificate of Calibration No. 399735-50788, Revision 1, dated December 18, 2023
- Certificate of Calibration No. 399735-50780, Revision 1, dated November 30, 2023
- Certificate of Calibration No. 399735-1119077, Revision 1, dated November 28, 2023
- Certificate of Calibration No. GB004, calibration due date May 17, 2027
- Certificate of Calibration No. DOM002, calibration due date July 29, 2024
- Certificate of Calibration No. DOM003, calibration due date July 29, 2024
- Certificate of Calibration No. ENI00005, calibration due date September 28, 2024
- Certificate of Calibration No. WM003, calibration due date September 5, 2024
- Certificate of Calibration No. DCP-005P4, calibration due date January 31, 2025
- Dimensional Inspection Record for Work Order No. 44992A01/A, dated May 30, 2023
- Dimensional Inspection Record for Work Order No. 44992A03, dated July 20, 2023
- Fastener Inspection Report for Job No. 45619, dated July 8, 2024
- Job Travelers Nos. 45243, 44992A02A, and 44992A03
- Receipt Inspection Report for Job No. 44982, dated March 13, 2023
- Receiving Tag Nos. 46753 and 46777
- Traceability Verification Forms dated April 4, 2024, May 8, 2024, and June 4, 2024
- Travelers for Job Nos. 44992M1, 45177, 45619, 45177A, and 45177AW
- Traveler No. 45030ARW, dated May 7, 2024
- Traveler No. 43702A, Revision 1, dated January 28, 2021
- Traveler No. 43702-1-A01, Revision 1, dated September 22, 2020
- Traveler No. 43702-1-A01-rw1, Revision 1, dated March 29, 2022

- Traveler No. 44961A, Revision 1, dated February 18, 2024
- Traveler No. 45235-1, Revision 1, dated May 17, 2023
- Traveler No. N43489-1, Revision 0, dated June 21, 2022
- Traveler No. N44819A01R, dated May 21, 2024
- Visual Inspection Report for Job No. 45619, dated July 8, 2024

Purchase Orders, Audit Reports, and Annual Evaluations

- Purchase Order (PO) No. 31934 for materials, dated March 27, 2014
- PO No. 29639 for a clamp, Revision 1, dated March 29, 2021
- PO No. 30219 for seat rings, dated February 10, 2022
- PO No. 31587 for calibration services, dated October 16, 2023
- PO No. 31278 for calibration services, dated May 26, 2023
- PO No. 31203 for several components, dated March 3, 2023
- PO No. 31313 for non-destructive examination services, dated June 16, 2023
- PO No. 31791 for heat treating services, dated January 30, 2024
- PO No. 30857 for tubing, dated December 20, 2022
- PO No. 30975 for paint thinner, dated February 10, 2023
- PO No. 31041 for material, dated March 10, 2023
- PO No. 31137 for material, dated April 10, 2023
- PO No. 32077 for six hex screws, dated May 31, 2024
- PO No. 31724 for calibration services, dated December 21, 2023
- PO No. 4500923354 for six screws, dated May 30, 2024
- PO No. 45677728 for two letdown coolers, dated September 29, 2022
- PO No. 03157224 for two heat exchangers, dated February 9, 2023
- PO No. 02457516 for ball valve, dated June 13, 2023
- PO No. 500656029 for connecting rod nut, dated May 26, 2023

- PO No. 03154871 for rectangular seal disc, dated February 16, 2023
- PO No. 1090991 for a Y strainer, dated April 5, 2021
- PO No.10687327 for a pump, dated January 23, 2023
- PO No. 02456714 for a seal kit, dated May 22, 2023
- PO No. 10693856 for a shell, seal injection water cooler, Revision 1, dated May 17, 2023
- PO No. 100026896 for a 14-inch strainer basket, Revision 1, dated February 2, 2024
- PO No. 4000030424 for a manifold suction assembly, Revision 2, dated August 3, 2023
- PO No. 3217328 for a spring left hand assembly, Revision 1, dated July 31, 2023
- PO No. 1090991 for a Y-Strainer Kit, Revision 3, dated April 5, 2021
- PO No. CCL240068, for a strainer kit, Revision 1, dated February 1, 2024
- PO No. 02457516, for a ball valve, Revision 0, dated June 13, 2023
- PO No. 0710170 for a heat exchanger, Revision 2, dated October 27, 2022
- PO No. RLLA30537, for an assembly cover, Revision 6, dated October 27, 2022
- PO No. SNG10289038, for an emergency diesel generator fuel oil transfer pump Revision 0, dated June 21, 2022
- Audit Report No. 0323-2024-1, audit dates: March 19 - 21, 2024
- Audit Report No. 0036-2301, audit dates: September 25 - 29, 2023
- Audit Report No. 3370-2023-01, audit dates: July 11 - 14, 2023
- Audit Report No. 2325-2023-1, audit dates: June 20 - 22, 2023
- Audit Report No. 0105-2201, audit dates: March 7 - 8, 2022
- Audit Report No. 0996-2101, audit dates: July 19 - 21, 2021
- Audit Report No. 31493 and 31640, audit dates: January 15 - 19, 2024
- Audit Report No. 4079-2301, audit dates: February 8 - 9, 2023
- Audit Report No. 28704, audit dates: March 28 - 30, 2023
- Audit Report No. 27096, audit dates: December 20 - 22, 2022

- Annual Year End Rating Report No. 52775, dated July 10, 2024
- Annual Year End Rating Report No. 52764, dated July 6, 2024
- Annual Year End Rating Report No. 52771, dated July 9, 2024
- Annual Year End Rating Report No. 52777, dated July 11, 2024
- Annual Year End Rating Report No. 52779, dated July 11, 2024

Certificates of Conformance and Certified Material Test Reports

- Certified Material Test Report (CMTR) for PO No. 31147, dated September 21, 2023
- CMTR for SFA5.9, Type 316/316L Weld Filler Metal, Heat No. 731408, dated March 29, 2005
- Certificate of Conformance (CoC), for Job Order No. 275491, Revision 1, dated February 27, 2024
- CoC for Job Order No. 43117, dated February 13, 2023
- CoC No. 10687327, dated March 29, 2023
- CoC for PO No. 02456714, dated May 31, 2023

Internal Audits Reports

- 2021 Internal Audit Report No. 0676-2101, audit dates August 2 - 6, 2021
- 2022 internal Audit Report No. 0676-2022-01, audit dates July 12-14, July 18-20, and July 25-26, 2022
- 2023 Internal Audit Report No. 0676-2023-01, audit dates August 21 - 23, and September 11, 2023

Nonconformance Reports

- 3868, 3897, 3899, 3909, 3910, 3916, 3919, 3936, 3939, 3943, 3946, 3947, 3960, 3996, 4002, 4033, 4048, 4059, 4075, 4080, 4082, 4088, 4089, 4090, 4093, and 4102

Corrective Action Reports

- 1458, 1459, 1460, 1465, 1466, 1467, 1468, 1469, 1470, 1471, 1482, 1483, 1499, 1500, 1509, and 1511

Corrective Action Reports Opened During the NRC Inspection

- 1527, 1529, 1531, 1532, 1533, 1534, and 1535

Training and Qualification Records

- Quality Assurance/Quality Control Personnel Qualification Matrix
- Marcus Alexander - President
- Brian Baxter - Director of Quality
- Nathan Goldsmith - Engineering Manager
- Dan Dixon - Shop Foreman
- Tracy Smith, Steve Simoski, Vera Aladjova - QA Specialists
- Pierre Goyette - Quality Control Inspector
- Katherine Itchue and Alicia Daniels - Project Managers
- Mike Thiel and Zack Robinson - Welders
- Lyle Goldorf and Marcin Borowski - Shipping & Receiving
- Richard Brooks - Machinist
- Michael McCann, Raymond Spuhl, Brad Boothe, James R. Peters, Robert J. Paton, Nick, and Nick Isbel - Lead Auditors
- Antonio Baladani, Matthew Laudenslager, and Taylor DeMars - Project Engineers
- Zackery G. Robinson, Welder Qualification No. ZGR-ASMEIX-6G-T-1, Manual GTAW Process to Section IX, dated August 31, 2021
- Level III Certification Record for Charles S Wilson, Visual Examination, dated September 13, 2023
- Level III Certification Records for Richard W. Gates, Liquid Penetrant (PT), Ultrasonic Test (UT), Magnetic Particle (MT), and Radiography (RT), dated October 17, 2023
- Level II Certification Records for Robert J. Reynolds, MT, PT, and UT, dated October 27, 2022
- Level II Certification Records for Joseph C. Slosar, MT, UT, and Visual Examination, dated May 3, 2023