

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

December 9, 2024

Mr. Patrick Stiles Quality Assurance Manager Conval, Inc. 96 Phoenix Avenue Enfield, CT 06082

SUBJECT: NUCLEAR REGULATORY COMMISSION VENDOR INSPECTION REPORT OF CONVAL, INC. NO. 99901367/2024-201

Dear Mr. Stiles:

From October 21 - 25, 2024, the U.S. Nuclear Regulatory Commission (NRC) staff conducted an inspection at the Conval, Inc.'s facility (hereafter referred to as Conval) in Enfield, CT. The purpose of this limited scope inspection was to assess Conval'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 Conval's implementation of quality activities associated with the design, fabrication, testing, and commercial-grade dedication of American Society of Mechanical Engineers (ASME) and non-ASME safety-related valves, and replacement parts and/or appurtenances being supplied to U.S. nuclear power plants. In addition, the NRC inspection team evaluated Conval's closure of the inspection findings documented in inspection report No. 99901367/2009-201, dated May 27, 2009 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML091310470). The enclosed report presents the results of this inspection. This NRC inspection report does not constitute NRC's endorsement of Conval's overall quality assurance (QA) or 10 CFR Part 21 programs.

Within the scope of this inspection, no violations or nonconformances were identified.

In accordance with 10 CFR 2.390, "Public Inspections, Exemptions, Requests for Withholding," of the NRC's "Rules of Practice," the NRC will make available electronically for public inspection a copy of this letter and its enclosure 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.

Sincerely,

Kum Kum A Signed by Kavanagh, Kerri on 12/09/24

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

Docket No.: 99901367

EPID No.: I-2024-201-0053

Enclosures:

1. Inspection Report No. 99901367/2024-201 and Attachment

SUBJECT: NUCLEAR REGULATORY COMMISSION VENDOR INSPECTION REPORT OF CONVAL, INC. NO. 99901367/2024-201 Dated: December 9, 2024

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ADAMS Accession No.: ML24324A221

NRR-106

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

Docket No.:	99901367		
Report No.:	99901367/2024-201		
Vendor:	Conval, Inc. 96 Phoenix Avenue Enfield, CT 06082		
Vendor Contact:	Mr. Patrick Stiles Quality Assurance Manager Email: PStiles@conval.com Phone: (860) 749-0761 x284		
Nuclear Industry Activity:	Conval, Inc. (hereafter referred to as Conval) is an American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code N and NPT Certificate Holder. Conval's scope of supply includes construction of ASME Class 1, 2 & 3 valves and non-code safety-related valves, including spare/replacement parts and components for NRC's regulated facilities.		
Inspection Dates:	October 21 - October 25, 2024		
Inspectors:	Dong Park Aixa Belen Andrea Keim Michael Fitzgerald	NRR/DRO/IQVB, Team Leader NRR/DRO/IQVB NRR/DRO/IQVB NRR/DRO/IQVB	
Approved by:	Kerri A. Kavanagh, Chief Quality Assurance and Vendor Inspection Branch Division of Reactor Oversight Office of Nuclear Reactor Regulation		

EXECUTIVE SUMMARY

Conval, Inc. 99901367/2024-201

The U.S. Nuclear Regulatory Commission (NRC) staff conducted a limited-scope vendor inspection at the Conval, Inc.'s (hereafter referred to as Conval) facility in Enfield, CT, 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 Conval 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." This was the third NRC inspection of Conval and the first at this facility in Enfield, CT.

This technically-focused inspection specifically evaluated Conval's implementation of quality activities associated with the Conval's construction of ASME Class 1, 2 & 3 valves and noncode safety-related valves, including spare/replacement parts and appurtenances being supplied to NRC regulated facilities. In addition, the NRC inspection team evaluated Conval's closure of the inspection findings documented in inspection report No. 99901367/2009-201, dated May 27, 2009 (Agencywide Documents Access and Management System Accession No. ML091310470).

Specific activities observed by the NRC inspection team included:

- Machining of a 1.5" valve disk
- Dedication of a valve body
- Calibration of a caliper, micrometer, and a go/no-go gage
- Material review board for a nonconforming threaded stem
- Final inspection of 1.5" valve disk
- Walkdown of a material storage area, measuring and test equipment (M&TE) equipment spaces, welding area, and hydrostatic testing

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

Nonconforming Materials, Parts, or Components and Corrective Action

The NRC inspection team reviewed the corrective actions that Conval took to address Violation 99901367/2009-201-01, and Nonconformances 99901367/2009-201-01, 99901367/2009-201-02, 99901367/2009-201-03 and 99901367/2009-201-04, identified during the U.S. Nuclear Regulatory Commission (NRC) inspection and documented in inspection report No. 99901367/2009-201, dated May 27, 2009 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML091310470). The NRC inspection team reviewed the documentation that provided the objective evidence that the corrective actions were completed and adequately implemented. In addition, the NRC inspection team verified the current processes and procedures to confirm that the issues identified in the inspection report continue to be resolved. Based on this review, the NRC inspection team closed Violation 99901367/2009-201-01, Nonconformances 99901367/2009-201-01, 99901367/2009-201-02, 99901367/2009-201-03, and 99901367/2009-201-04.

Inspection Areas

The NRC inspection team determined that Conval established its programs for design control, commercial-grade dedication, procurement document control and oversight of contracted activities, material traceability, manufacturing control, test control, control of M&TE, nonconforming materials, parts, or components, corrective action, 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 Conval is implementing its policies and procedures associated with these programs. In addition, the NRC inspection team determined that Conval 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. 10 CFR Part 21 Program

a. Inspection Scope

The NRC inspection team reviewed Conval, Inc.'s (hereafter referred to as Conval) policies and implementing procedures that govern the implementation of its Title 10 of the *Code of Federal Regulations* (10 CFR) Part 21, "Reporting of Defects and Noncompliance," 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 Conval's Purchase Orders (POs) for compliance with the requirements of 10 CFR 21.6, "Posting requirements," and 10 CFR 21.31, "Procurement documents," respectively. The NRC inspection team also verified that Conval's nonconformance and corrective action procedures provide a link to the 10 CFR Part 21 program.

Furthermore, for the one 10 CFR Part 21 evaluation performed by Conval in the past three-year interval, the NRC inspection team verified that Conval had effectively implemented the requirements for evaluating a deviation or failure to comply. The NRC inspection team verified that for the one 10 CFR Part 21 evaluation no notifications were required.

The NRC inspection team also discussed the 10 CFR Part 21 program with Conval'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 Conval 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 Conval is implementing its policies and procedures associated with the 10 CFR Part 21 program. No findings of significance were identified.

2. Design Control

a. Inspection Scope

The NRC inspection team reviewed Conval'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, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities," and the applicable requirements of Subsection NCA, "General Requirements for Division 1 and Division 2," of Section III, "Rules for Construction of Nuclear Facility Components," of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code.

The NRC inspection team verified that Conval's design control process (1) adequately translated technical and quality requirements into procedures and instructions, (2) applied materials conformed to the material specifications, (3) design activities were effectively controlled by documented instructions and procedures, and (4) design changes were accomplished in accordance with the approved procedures. The NRC inspection team confirmed that the customer requirements were adequately translated into the applicable Conval's drawings, instructions, procedures, and specifications for the fabrication of globe and gate valves.

The NRC inspection team also confirmed that for a sample of the documentation associated with the design package, the documentation included the applicable technical and regulatory requirements as required by customer specifications, Conval's procedures, and the applicable ASME B&PV Code requirements. The NRC inspection team also evaluated how the design specifications were met; how design changes were controlled and approved; and how configuration control was maintained. In addition, the NRC inspection team verified that the materials of construction and components for globe and gate valves conformed to the appropriate material specification, design specification, and ASME B&PV Code requirements.

The NRC inspection team also discussed the design control program with Conval'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 Conval 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 Conval is implementing its policies and procedures associated with the design control program. No findings of significance were identified.

3. Commercial-Grade Dedication

a. Inspection Scope

The NRC inspection team reviewed Conval'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 CGD packages for the following components: regulator, bearing cap, stem, piston, bushing, backseat for globe valve, yoke, yoke casing and valve body. Within these CGD packages, the NRC inspection team reviewed: (1) POs; (2) technical evaluations; (3) inspection and test reports; and (4) Certificates of Conformance (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 observed inspection and testing (CGD Method 1) activities for the 1.5" valve disk.

The NRC inspection team also reviewed Conval's program for the utilization of unqualified source material to verify compliance with the requirements of Subparagraph NCA-4255.5, "Utilization of Unqualified Source Material," of Section III of the ASME B&PV Code. With respect to Conval's process for the utilization of unqualified source material, the NRC inspection team reviewed a sample of material Certificated Material Test Reports, receiving documents, and the supporting laboratory test reports for stainless steel bar stock of the following diameters: 1 ¼", 1 ½", 1 ¾", and 1 7/8". The NRC inspection team confirmed that test reports included the required chemical analysis and mechanical properties testing in accordance with the material specification that was performed on each piece of material in accordance with the requirements of NCA-4255.5. The NRC inspection team also verified that the test results were consistent and from the same heat number.

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

c. Observations and Findings

No findings of significance were identified.

d. Conclusion

The NRC inspection team concluded that Conval 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 Conval is implementing its policies and procedures associated with the CGD program. No findings of significance were identified.

4. Procurement Document Control and Supplier Oversight

a. Inspection Scope

The NRC inspection team reviewed Conval's policies and implementing procedures that govern the implementation of its procurement document control and supplier oversight programs 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, Conval's Qualified Supplier List (QSL), 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 selected a sample of suppliers from the QSL to review the methodology for conducting and documenting audits to verify adequate evaluation of the

suppliers' controls for meeting the applicable requirements of Appendix B to 10 CFR Part 50. For the sample of supplier audits reviewed, the NRC inspection team 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 Conval's responsible management. For the review of the annual evaluations, the NRC inspection team confirmed they included the information required by Conval'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 auditors. Furthermore, the NRC inspection team reviewed the training and qualification records of auditors and confirmed that auditing personnel had completed all the required training and had maintained the applicable qualification and certification in accordance with Conval's policies and procedures.

The NRC inspection team also discussed the procurement document control and supplier oversight programs with Conval'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. <u>Conclusion</u>

The NRC inspection team concluded that Conval is implementing its procurement document control and supplier oversight programs 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 Conval is implementing its policies and procedures associated with the procurement document control and supplier oversight programs. No findings of significance were identified.

5. Material Traceability

a. Inspection Scope

The NRC inspection team reviewed Conval's 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 to 10 CFR Part 50.

The NRC inspection team performed a walkdown of the material storage and welding areas. The NRC inspection team confirmed that materials were adequately identified with Conval's unique identification code, which is traceable to the POs and vendor certification reports. The NRC inspection team verified that receipt inspection records were reviewed by Conval for compliance with the requirements of the POs and approved by qualified individuals. The NRC inspection team discussed the receipt inspection process with Conval's Quality Control Inspector.

The NRC inspection team also discussed the material traceability program with Conval'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 Conval is implementing its material traceability program in accordance with the regulatory requirements of Criterion VIII of Appendix B to 10 CFR Part 50. Based on the limited sample of documents reviewed, the NRC inspection team also determined that Conval is adequately implementing its policies and procedures associated with the material traceability program. No findings of significance were identified.

6. Manufacturing Control

a. Inspection Scope

The NRC inspection team reviewed Conval's policies and implementing procedures that govern the implementation of its manufacturing control 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 ASME B&PV Code, and the American Society for Nondestructive Testing (ASNT) SNT-TC-1A, "Personnel Qualification and Certification in Nondestructive Testing."

Welding

There were no safety-related welding activities performed during the week of the inspection. As such, the NRC inspection team reviewed a sample of completed welding records for, including Welding Procedure Specifications (WPS) and their associated Procedure Qualification Records (PQR). The NRC inspection team confirmed that the welding records, including the WPSs and PQRs, contained the required information in accordance with the applicable Conval's welding procedures and the applicable requirements of Section IX of the ASME B&PV Code. The NRC inspection team also verified that welding activities were performed by qualified welders.

The NRC inspection team performed a walk-through of the weld storage area and confirmed that weld rods were being adequately stored and controlled to prevent degradation, inadvertent use, or loss of traceability in accordance with the applicable procedures. The NRC inspection team also verified that the process for issuing weld filler metal was controlled in accordance with applicable welding procedures. The NRC inspection team noted that the weld area was secured, clean, and protected from wind and moisture.

The NRC inspection team also reviewed the welder performance qualifications and continuity records for the four welders. The NRC inspection team confirmed that the

welders had completed the required training and had maintained their training and qualification in accordance with Conval's welding procedures and the applicable requirements of Sections III and IX of the ASME B&PV Code.

Non-Destructive Examination (NDE)

There were no safety-related NDE activities performed during the week of the inspection. As such, the NRC inspection team reviewed a sample of completed NDE records associated with magnetic particle testing, liquid penetrant testing, and visual examinations. The NRC inspection team confirmed that the NDE reports contained the required information in accordance with Conval's NDE procedures and the applicable requirements of Section V of the ASME B&PV Code.

The NRC inspection team also verified that NDE activities were performed by qualified NDE personnel. In addition, the NRC inspection team reviewed a sample of Conval's NDE personnel training and qualification records and confirmed that the NDE personnel had completed the required training and had maintained their qualifications in accordance with Conval's NDE procedures and the applicable requirements of ASNT SNT-TC-1A and Sections III and V of the ASME B&PV Code.

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

a. Observations and Findings

No findings of significance were identified.

b. Conclusion

The NRC inspection team concluded that Conval is implementing its manufacturing control 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 Conval is implementing its policies and procedures associated with the manufacturing control program. No findings of significance were identified.

7. Test Control

a. Inspection Scope

The NRC inspection team reviewed Conval's policies and implementing procedures that govern the implementation of its test control program to verify compliance with the requirements of Criterion XI, "Test Control," of Appendix B to 10 CFR Part 50. There were no safety-related testing activities performed during the week of the inspection. As such, the NRC inspection team reviewed a sample of completed hydrostatic test reports associated with an ASME test fixture used as a demonstration to obtain Conval's ASME nuclear certification. This certification allows Conval to certify and stamp safety-related components constructed in accordance with Section III of the ASME B&PV Code.

The NRC inspection team verified that Conval's test procedures adequately included the applicable technical, quality, and regulatory requirements. The NRC inspection team also confirmed that the following testing elements were satisfied, verified, and recorded, as appropriate: (1) test parameters and initial conditions, (2) test acceptance criteria, (3) test prerequisites, (4) test instrument range, accuracy, and uncertainty appropriate for the test; (5) current calibration; and (6) proper procedure sequence followed, and any deviations documented and evaluated.

The NRC inspection team also confirmed that the tests were performed using properly calibrated measuring and test equipment (M&TE). In addition, the NRC inspection team also reviewed the training and qualification records of the test technicians identified in the reports and confirmed that testing personnel had completed all the required training and had maintained the applicable qualification and certification in accordance with Conval's policies and procedures.

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

8. Control of Measuring and Test Equipment

a. Inspection Scope

The NRC inspection team reviewed Conval's policies and implementing procedures that govern the implementation of its M&TE program to verify compliance with the regulatory 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 determined 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 calibration records reviewed by the NRC inspection team indicated the as-found or as-left conditions, accuracy required, calibration results, calibration dates, and the due date for recalibration.

The NRC inspection team confirmed that when M&TE equipment is found to be out of calibration, an out of tolerance report is initiated, and an evaluation is performed to determine if the M&TE was previously used. The NRC inspection team performed a walkdown of Conval's M&TE storage areas to observe that M&TE were labeled, handled, and stored in a manner that indicated the calibration status of the instrument and ensured its traceability to calibration test data.

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

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

a. Inspection Scope

The NRC inspection team reviewed Conval's policies and implementing procedures that govern the implementation of its nonconforming materials, parts, or components and corrective action program 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 verified that Conval's processes and procedures provide for the identification, documentation, segregation, evaluation, and disposition of nonconforming items. Nonconformances could be dispositioned as "Repair," "Scrap," "Use-As-Is," or "Return to Vendor." The NRC inspection team reviewed a sample of Nonconforming Materials (NCM) reports and verified that Conval: (1) dispositioned the NCM reports in accordance with the applicable procedures; (2) documented an appropriate technical justification for the selected disposition; and (3) took adequate corrective action regarding the nonconforming items, as applicable.

The NRC inspection team also reviewed a sample of Corrective Action Reports (CARs) and verified that the CARs contained, as applicable: (1) adequate documentation and description of conditions adverse to quality; (2) an appropriate analysis of the cause of these conditions and the corrective actions taken to prevent recurrence; (3) direction for review and approval by the responsible authority; (4) a description of the current status of the corrective actions; and (5) the actions taken to verify timely and effective implementation of the corrective actions.

The NRC inspection team reviewed the corrective actions that Conval took to address the inspection findings identified in the NRC's Inspection Report (IR) No. 99901367/2009-201, dated May 27, 2009 (ADAMS Accession No. ML ML091310470).

The NRC inspection team also discussed the nonconforming materials, parts, or components and corrective action programs with Conval'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

1. Corrective Action Associated with Violation 99901367/2009-201-01

Following the April 2009 inspection of Conval, the NRC issued Violation 99901367/2009-201-01 for Conval's failure to provide sufficient guidance including the definitions form 10 CFR Part 21, into procedures to ensure that deviations and failures to comply would be evaluated to determine whether they were associated with a substantial safety hazard. Specifically, Conval failed to incorporate the appropriate definitions for "defect" and "deviation" into its 10 CFR Part 21 procedure. In addition, the procedure did not include "failures to comply" in multiple locations.

In its response to the NRC, dated June 26, 2009, (ADAMS Accession No. ML091820116) Conval stated that it will revise procedure for 10 CFR Part 21 to incorporate the definitions for deviation and defect, and add "failure to comply" from 10 CFR Part 21 regulation and revise the reject tag to include screening for performing an evaluation10 CFR Part 21. Conval committed to training staff on the updated procedure and to perform a review of completed reject tags to verify that appropriate review for 10 CFR Part 21 review and applicability. The NRC inspection team reviewed CP-0240, "Implementation of 10 CFR Part 21," and verified that deviations and failures to comply would be evaluated to determine whether they were associated with a substantial safety hazard. The NRC inspection team reviewed training records to verify that personnel satisfied training requirements and received Part 21 training. The NRC inspection team confirmed that Conval is implementing their Part 21 program per procedure, and that the current process still meets 10 CFR Part 21. Based on its review, the NRC inspection team closed Violation 99901367/2009-201-01.

2. Corrective Action Associated with Nonconformance 99901367/2009-201-01

The NRC also issued Nonconformance 99901367/2009-201-01 for Conval's failure to incorporate the appropriate requirements into its dedication program documents and did not establish an effective and consistent procedure for commercial grade dedication. Specifically, Conval's commercial grade dedication procedure failed to provide the appropriate 10 CFR Part 21.3 definition for commercial grade item as it applies to nuclear power plants licensed pursuant to 10 CFR Part 50.

In its response to the NRC, dated June 26, 2009, (ADAMS Accession No. ML091820116) Conval stated that it will revise the procedure for commercial grade dedication to incorporate the correct definition from 10 CFR Part 21.3 for the term commercial grade item and provide training to effected personnel. The NRC inspection team reviewed QP-0006, "Dedication of Commercial Grade Items and

Services for Nuclear Safety Related Applications," and verified that proper definition of commercial grade items in QP-0006 consistent with 10 CFR Part 21. The NRC inspection team reviewed training records to verify that personnel satisfied training requirements and received CGD training. The inspection of Conval's CGD program confirmed that Conval is implementing their CGD program as described in their procedures. Based on its review, the NRC inspection team closed Nonconformance 99901367/2009-201-01.

3. Corrective Action Associated with Nonconformance 99901367/2009-201-02

The NRC also issued Nonconformance 99901367/2009-201-02 for Conval's procedure failed to provide adequate and complete instructions for staff to identify and document nonconforming processes and activities to prevent further processing, delivery, installation, and use of nonconforming items. Specifically, the corrective action for Nonconformance 99901367/2007-201-2c identified the commitment to revise QP-0015, "Control of Nonconformances," dated September 25, 2003, to address nonconformances in processes and activities. In the April 15, 2009, revision to QP-0015, this statement had only been added to the purpose of the procedure. The body of the procedure was not revised, and thus failed to provide any implementing guidance for the identification, documentation, evaluation, or disposition of nonconforming processes or activities.

In its response to the NRC, dated June 26, 2009, (ADAMS Accession No. ML091820116) Conval stated it will revise its procedure for nonconformances to include implementing guidance. In addition, staff will be trained on the updated procedure. The NRC inspection team reviewed QP-0015 and verified that proper instructions were provided for identifying and documenting nonconforming activities. The NRC inspection team reviewed training records to verify that personnel satisfied training requirements and received QA program training. The NRC inspection team confirmed that Conval is implementing their guidance for the identification, documentation, evaluation, or disposition of nonconforming processes and activities. Based on its review, the NRC inspection team closed Nonconformance 99901367/2009-201-02.

4. Corrective Action Associated with Nonconformance 99901367/2009-201-03

The NRC also issued Nonconformance 99901367/2009-201-03 for Conval's failure to effectively implement corrective actions for findings identified in NRC Inspection Report 99901367/2007-201 Specifically, Conval's 10 CFR Part 21 procedure did not fully implement the correct use of the terms "defect," "deviation," and "failure to comply." In addition, Conval's procedure for commercial grade dedication did not include the appropriate 10 CFR 21.3 definition for commercial grade item.as it applies to nuclear power plants licensed pursuant to 10 CFR Part 50.

In its response to the NRC, dated June 26, 2009, Conval stated it will revise its procedures for nonconformances, corrective actions, 10 CFR Part 21, and commercial grade dedication to include the appropriate definitions from 10 CFR Part 21 and implementing guidance. The affected staff will be trained on the updated procedures. The NRC inspection team verified that the QA Manager performs an annual review of the latest version of 10 CFR Part 21 in addition to Appendix B to 10

CFR Part 50. This change was also added to procedure QP-0034, "Quality Department Reports."

The NRC inspection team reviewed QP-0016, "Corrective Action," and verified that the procedure addressed the proper review of corrective actions prior to closure. The NRC inspection team reviewed training records to verify that personnel satisfied training requirements and received QA Program training. The NRC inspection team confirmed that Conval is implementing their corrective action program per procedures. Based on its review, the NRC inspection team closed Nonconformance 99901367/2009-201-03.

5. Corrective Action Associated with Nonconformance 99901367/2009-201-04

The NRC also issued Nonconformance 99901367/2009-201-04 for Conval's procedures failed to provide guidance for the organization to identify and document conditions adverse to quality as part of its corrective action process. Specifically, Conval procedure QP-0016states that the Quality Assurance Manager is responsible for generating all CARs. No other method for other employees to identify and report or document conditions adverse to quality were provided.

In its response to the NRC, dated June 26, 2009, (ADAMS Accession No. ML091820116) Conval stated that the intent of only the Quality Assurance Manager could prepare CARs was to limit access to the database. The intent was not to limit the ability of staff to identify or report conditions adverse to quality. Conval proposed to update the corrective action procedure and train all affected staff of the changes. The NRC inspection team reviewed QP-0016 and verified that the procedure provided guidance to identify and document conditions adverse to quality as part of its corrective action process. The NRC inspection team reviewed training records to verify that personnel satisfied training requirements and received QA program training. The NRC inspection team confirmed that Conval is implementing their corrective action program per procedures. Based on its review, the NRC inspection team closed Nonconformance 99901367/2009-201-04.

No findings of significance were identified.

c. Conclusion

The NRC inspection team concluded that Conval is implementing its nonconforming materials, parts, or components and corrective action programs in accordance with the regulatory requirements of Criterion XV and Criterion XVI of Appendix B to 10 CFR Part 50. Based on the limited sample of documents reviewed, the NRC inspection team also determined that Conval is implementing its policies and procedures associated with the control of nonconforming materials, parts, or components and corrective actions. No findings of significance were identified and the NOV and NONs identified in Inspection Report 99901367/2009-201 have been closed

10. Internal Audits

a. Inspection Scope

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

The NRC inspection team verified that Conval's procedures 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) audit plan; (2) audit results; (3) adequately documented objective evidence with the applicable requirements; and (4) a review by Conval'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 verified that Conval adequately initiated and corrected any findings identified during the internal audits.

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

10. Entrance and Exit Meetings

On October 21, 2024, the NRC inspection team discussed the scope of the inspection with Mr. Frank Siver, Chairman, and other members of Conval's management and technical staff. On October 25, 2024, the NRC inspection team presented the inspection results and observations during an exit meeting with Mr. Scott Allard, President, and other members of Conval'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
Patrick Stiles	Quality Assurance (QA) Manager	Conval, Inc. (Conval)	Х	х	х
Frank Siver	Chairman	Conval	Х		
Scott Allard	President	Conval		Х	
Glen Gautieri	Director of Manufacturing Operations	Conval	х	х	х
Joseph Ford,	Manager, Engineering	Conval	Х	Х	х
Chris Schweitzer,	Vice President, Finance	Conval	Х		Х
Don Bowers	Vice President, Sales & Marketing Welding Supervisor	Conval			х
Colin Czerpak	Senior Product Engineer	Conval	Х	х	Х
Sandy Minukas	QA Specialist	Conval	Х	Х	
Greg Winston	QA Specialist	Conval	Х	Х	Х
Suzanne Pedemonti	Inside Sales Manager	Conval	Х	Х	
Kris Stevens	Inside Sales Manager	Conval	Х	х	
Juan Santana	Quality Control Inspector	Conval			Х
Cheryl Palazzo	Production Planner	Conval			Х
Barry Smith	Manufacturing Engineering Supervisor	Conval			х
Nisha Butala	M&TE Technician	Conval			Х
Peter Percoski	Welder	Conval			Х
Chris Smith	Quality Test Personnel	Conval			х
Kerri A. Kavanagh	Branch Chief	Nuclear Regulatory Commission (NRC)		Х*	

Name	Title	Affiliation	Entrance	Exit	Interviewed
Dong Park	Inspection Team Leader	NRC	x	x	
Aixa Belen	Inspector	NRC	Х	Х	
Andrea Keim	Inspector	NRC	Х	Х	
Michael Fitzgerald	Inspector	NRC	Х	X	

*Remote

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	Туре	Description
99901367/2009-201-01	CLOSED	NOV	10 CFR Part 21
99901367/2009-201-01	CLOSED	NON	Criterion III & V
99901367/2009-201-02	CLOSED	NON	Criterion XV
99901367/2009-201-03	CLOSED	NON	Criterion XVI
99901367/2009-201-04	CLOSED	NON	Criterion V & XVI

4. DOCUMENTS REVIEWED

Policies and Procedures

- "Quality Assurance Manual for Construction of ASME Section III, Class 1, 2, 3 and 10 CFR 50 Appendix B Valves, Valve Parts and Appurtenances," 5th Edition, Revision 0, dated May 10, 2024
- Corporate Procedure (CP)-0010, "Documentation System for Quality Management System," Revised May 13, 2021
- CP-0020, "Generation & Control of Procedures, SEI's, and WPS's," dated January 24, 2023
- CP-0240, "Implementation of 10 CFR Part 21," Revised May 9, 2023
- CP-0260, "ASME Code Order Entry & Contract Review Process," Revised September 27, 2023

- CP-0290, "Indoctrination & Training," Revised March 24, 2021
- Engineering Procedure EP-0003, Engineering Change Notice, Revised May 18, 2021
- EP-0005, "Customer Drawings (Sales Prints)," Revised April 26, 2024
- EP-0017, "Production Drawings," Revised February 16, 2024
- EP-0018, "Special Engineering Instruction," Revised March 16, 2021
- EP-0025, "Generating and Control of Welding & Brazing Procedures," Revised March 15, 2021
- EP-0028, "Evaluation and Acceptance of Commercially Dedicated Items," Revised March 16, 2023
- EP-0031, "NJN Processing and Design of Code Items," Revised March 9, 2022
- EP-0032, "Design Review of Code Items," Revised March 16, 2021
- EP-0033, "Design Verification of Code Items," Revised March 16, 2021
- EP-0034, "Design Report, Code-Stamped Product 4 inch and Smaller," Revised April 29, 2024
- EP-0035, "Qualification Requirements for Certifying Engineers," Revised April 25, 2024
- EP-0036, "Processing and Design of Nuclear Items," Revised April 26, 2024
- Production Control Procedure (IP)-0031, Work Order Traveler Packets for ASME CODE & Safety Related Product, Revised March 24, 2023
- EP-0038, "Evaluation and Acceptance of Commercially Dedicated Services," dated May 25, 2021
- IP-0051, "ASME & Safety Related Purchasing & PO Document Control," Revised March 24, 2023
- Quality Procedure (QP)-0004, "Final Product Inspection of ASME Code and Nuclear Valves and Parts," Revised January 19, 2023
- QP-0006, "Dedication of Commercial Grade Items and Services for Nuclear Safety Related Applications," Revised March 24, 2023
- QP-0007, "Qualification of Inspection & Test Personnel," Revised February 7, 2022
- QP-0008, "Material Identification and Marking," Revised January 19, 2023
- QP-0009, "Special Process Control (Welding, Brazing, NDE, Heat Treating, Plating)," Revised February 7, 2022
- QP-0011, "Review, Approval & Control of Work Order Travelers (Nuclear & ASME Code)," Revised February 7, 2022
- QP-0012, "Measuring & Test Equipment Control," Revised October 10, 2023
- QP-0015, "Control of Nonconformances," Revised April 18, 2024
- QP-0016, "Corrective Action," Revised February 9, 2022
- QP-0018, "Audits," Revised December 21, 2023
- QP-0020, "Supplier Qualification Program (ASME & Safety Related)," Revised December 21, 2023
- QP-0023, "Unqualified Source Material Processing," Revised December 21, 2023
- QP-0030, "Control and Processing of Nuclear Material," Revised February 9, 2022
- QP-0031, "Receiving Inspection for Nuclear Safety Related and ASME Code Items," Revised January 17, 2024
- QP-0034, "Quality Department Reports," Revised March 12, 2021
- QP-0037, "Qualification of Auditors," Revised April 30, 2021
- QP-0040, "Procedure for M&TE," Revised January 27, 2023
- Special Engineering Instruction (SEI)-3, "Electron Beam Welding General Requirements," Revision AA, dated October 7, 2022
- SEI-3-1, "Approved E.B. Weld Procedures," Revision B, dated April 23, 2021

- SEI-3-2, "E.B. Welding Peaking Filament for CW606," Revision A, dated September 21, 2022
- SEI-3-3, "E.B. Weld Part Cleaning Procedures," Revision A, dated September 21, 2022
- SEI-4, "Production Test Procedure for Forged Steel Stop, Check, and Stopcheck Valves," Revised April 17, 2023
- SEI-4N, "Production Test Procedure for Forged Steel Stop, Check, Stopcheck, and Bellows Valves N-Stamp Products," Revision J, dated February 12, 2014
- SEI-14, "Liquid Penetrant Examination ASME Section III Fluorescent Post Emulsified Penetrant," Revision W, dated August 27, 2024
- SEI-14-1, "Non-Destructive Test of Valve Pressure Containing Shell," Revision B, January 28, 1982
- SEI-14-3, "Liquid Penetrant Examination ASME Section III Special Acceptance Criteria," Rev. Original, dated February 10, 2010
- SEI-15, "Heat Treating of 440C Stainless Steel," Revision D, dated March 19, 1990
- SEI-19, "Liquid Penetrant Examination Solvent Removable Nonaqueous Wet," Revision H, dated April 29, 1976
- SEI-24, "Cleaning and Packaging Valves for Nuclear Service," Revision M, dated October 12, 2021
- SEI-24-2, "Cleaning and Packaging of Nuclear Service Valves for Westinghouse/Vogtle," Revision Original, dated February 17, 2010
- SEI-39, "Magnetic Particle Examination Procedure," Revision D, dated January 2, 2020
- SEI-47, "Identification Marking for Heat Code and Non-Destructive Examination," Revision P, dated February 20, 2024
- SEI 50N, "Marking of Part Numbers & Size Codes on Valve Assembly Components for N-Stamp Valves," Revision A, dated October 9, 2009
- SEI-57, "Storage and Shelf-Life Requirements for Valves, Valve Components, and Materials," Revision C, dated June 28, 1999
- SEI-74, "Gas Tungsten Arc and Gas Metal Arc Welding General Requirement," dated June 11, 2018
- SEI-74-2, "Approved GTAW Weld Procedures," Revision E, dated April 23, 2021
- SEI-85, "Classification and Control of ASME Section III Globe and Gate Valve Components," Revision F, dated April 20, 2010
- SEI-92, "Procedure for Storage and Control Certified Weld Filler Material," Revision A, dated July 7, 1997
- SEI-118, Commercial Grade Dedication; Inspection and Testing Requirements, Revision S, dated June 9, 2021
- SEI 118-39, "Calibration Supplier Services," Revision D, dated June 10, 2021
- SEI 118-41, "Braze and Heat Treat Supplier Services," Revision D, dated June 10, 2021
- SEI-154, "Nuclear Weld Wire Storage and Control," Revision A, dated May 17, 2012
- Procedure Qualification Record (PQR) 384-3A, dated November 2, 2022
- PQR 723-3A, dated February 22, 2024
- PQR 724-3A, dated February 22, 2024
- PQR 725-3A, dated March 12, 2024

Part 21 Records

• Part 21 Evaluation on CAR 1266 – Design temperature of 1120F

Design and Commercial-Grade Dedication Records

- Engineering Package for Part # 12H2ZJ NB0058 Size 8J including:
 - FE0035 NJN#106993 dated December 16, 2022 for N-stamp Class 1-10 CFR Part 21
 - ECN 6947 (k) for NB0058, dated December 19, 2022
 - FE-033 Design Specification checklist 10080-DMS-0509, ADD 1&2 Rev 0 dated December 28, 2022
 - FE-027 Design Verification Report, dated January 20,2023
 - FE026, Design Review Checklist dated January 20,2023
 - FE-024 Reconciliation Form, dated December 28, 2022
- Engineering Package for 2.00-12H2ZJ-S168J-NB0058, dated May 2024
- CGD packages reviewed
 - o SEI 118-7, 7h Piston, Part # SP-2729-S01*0DR,
 - SEI 118-13, Check Spring Size 7, Part # 1456-G05*0AD, dated August 1, 2024
 - o SEI-118-5, Bushing Size 8N, Part # 15079-B01*0AR, dated December 12, 2023
 - SEI-118-33, Backseat for Stop/Check Globe Valve, Size 8N, Part # 9735-D16, dated December 8, 2023
 - SEI-118-21, Stem, Gate Valve, Part # 11117-D24*0CL 8N/8R, dated January 23, 2024
 - SEI-18, Bearing Cap for Bellows/Gate Valve Yoke 8N, Part # 15082-D02*0BF, dated February 2, 2024
 - SEI-118-4, Packing Gland Size 9, Part # 1679-D02-*0AH, dated January 23, 2024.
 - SEI-118-19, Stem Nut, Part # 11118-B01*0BG, December 8, 2023
 - o SEI-118-10, SS Bolting, Part # H5H121048D25*0AT, dated December 12, 2023
- Drawing No. 20251 1 1/2" Valve Disk
- Drawing No. 1000.PRT 1" Valve Body
- Drawing No. 15979 Rev A, Bushing
- Drawing No. 11117-D24, Stem, Gate Valve CL-3500, Rev E
- Drawing No. 15082, Bearing Cap Gate Valve, Rev 6
- Drawing # 1679, Gland, Rev J
- Drawing # 1679, Gland, Rev J

Calibration and Test Records

- 100-9-M Gage Block Set, due November 29, 2025
- 100-162-M 5" Gage Block, due February 23, 2025
- 100-163-M 6" Gage Block, due February 23, 2025
- 100-164-M 7" Gage Block, due February 23, 2025
- 100-165-M 8" Gage Block, due February 23, 2025
- 100-166-M 10" Gage Block, due February 23, 2025
- 100-224-M Digital Outside Micrometer 0-1", due December 18, 2024
- 100-230-M Digital Pressure Gage, due March 5, 2025

- 500-291-DC Digital Depth Caliper 0-12", April 22, 2025
- 500-326-DC Digital Caliper 0-8", due December 4, 2024
- 1000-113-DOM Outside Diameter Micrometer 0-1", due March 20, 2025
- 1000-148-DOM Outside Diameter Micrometer 1-2", due April 22, 2025
- 1000-160-DOM Depth Micrometer 0-6", due January 29, 2025
- 1000-261-DOM Outside Diameter Micrometer 1-2", due March 20, 2025
- 1000-263-DOM Blade Micrometer 0-1", due April 1, 2025
- 2300-01-POMM Coordinate Measuring Machine, due May 24, 2025
- CPG0.8080-4 Go/No-go Cylinder Plug, due October 22, 2025
- 500-122-DC Digital Caliper 0-8", retired
- 1200-147-TW Torque Wrench 5-75 lb-ft, retired
- TP3.1250-08-3C-6, ASME Thread Plug, retired
- Water Test Report, dated September 23, 2024
- Calibration Report Certificate ID: 03609-88594 dated May 17, 2022
- Calibration Report Certificate ID: 19466-08055 dated May 17, 2022

M&TE Discrepancy Records

- G24-01
- G24-03
- G24-06
- G24-35

Supplier Oversight Records

- Qualified Supplier List dated June 17, 2024
- 2021 Plan, Checklist, and Report on Supplier Audit of Ledford Gage Lab, Inc. performed on November 2, 2021
- 2023 Plan, Checklist, and Report on Supplier Audit of Laboratory Testing Inc. performed on March 8-9, 2023
- 2023 Plan, Checklist, and Report on Supplier Audit of US Drop Forge performed on October 17-19, 2023
- Supplier Annual Assessment Report of Ledford Gage Lab, dated November 7, 2022
- Supplier Annual Assessment Report of Ledford Gage Lab, dated November 14, 2023
- Supplier Annual Assessment Report of U.S. Drop Forge, dated December 21, 2022
- Supplier Annual Assessment Report of Laboratory Testing Inc, dated March 29, 2022
- Supplier Annual Assessment Report of Laboratory Testing Inc, dated April 12, 2024
- Unqualified Source Material Documentation 1-7/8" D24N-AHM, dated February 15, 2022
- Unqualified Source Material Documentation 1-1/4" D16N-AAG, dated March 21, 2022
- Unqualified Source Material Documentation 1-3/4" D24N-AMM, dated June 28, 2023
- Unqualified Source Material Documentation 1-1/2" S04N-CB, dated July 11, 2023

Manufacturing Control Documents

- WO-253576/1
- WO-249365
- WO-250174/1
- WO-230205/1

• WO-236209/1

Purchase Orders (POs)

- PO-116939
- PO-129788
- PO-131041
- PO-139617
- PO-140139
- PO-140318
- PO 140501
- PO-140805
- PO-139988
- PO-142850
- PO-137456
- PO-138957
- PO-C1012451 (Cook) CO-110608
- PO-03178167(Brunswick) PO-BP00111813 (Curtis-Wright) CO-109783
- PO-500655627(Palo Verde) CO-108054
- PO-500660010 (Palo Verde) CO-109421
- PO-01405251 (Constellation) CO-108730
- PO-45679765 (Energy Harbor)

Internal Audit Records

- Audit # 2022-1, Quality Assurance Internal Audit Plan, dated September 20, 2022
- Audit # 2022-1, Quality Assurance Internal Audit Summary, dated October 13, 2022
- Audit # 2023-1, Quality Assurance Internal Audit Plan, dated July 10, 2023
- Audit # 2023-1, Quality Assurance Internal Audit Summary, dated September 22, 2023
- Audit # 2023-2, Quality Assurance Internal Audit Plan, dated September 25, 2023
- Audit # 2023-2, Quality Assurance Internal Audit Summary, dated September 26, 2023
- Audit # 2024-1, Quality Assurance Internal Audit Plan, dated August 16, 2024
- Audit # 2024-1, Quality Assurance Internal Audit Summary, dated September 11, 2024

Nonconformance Material Reports (NCM)

- 17602
- 17846
- 18004
- 18568
- 18576
- 18579
- 18796
- 18836
- 19033
- 19245
- 19257

- 20011
- 20613
- 21152

Corrective Action Report (CAR)

- CAR # 764
- CAR # 765
- CAR # 1249
- CAR # 1253
- CAR # 1255
- CAR # 1256
- CAR # 1260
- CAR # 1266
- CAR # 1267
- CAR # 1276
- CAR # 1279
- CAR # 1280
- CAR # 1287
- CAR # 1288
- CAR # 1289
- CAR # 1294

Training and Qualification Records

- NDE Technicians Greg Kevorkian, Francis Evers, John Doucette, Bill Davis, David Black, Hal A Koudelka, Michael Riley, Richard Goodwin, Zach Byers, Richard Stuart
- Welders Peter Percoski, Jean Landry, Dooren Maloney, Logan Tanugay
- Quality Technicians Nisha Butala
- Certifying Engineer James P. Burke
- Lead Auditor Qualification Patrick Stiles, Gill Valentine, Gary Donnell