



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

February 14, 2025

Mr. Victor Montalbano  
Vice-President, Quality, Performance and Safety  
Framatome Inc.  
3315 Old Forest Road  
Lynchburg, VA 24501

SUBJECT: NUCLEAR REGULATORY COMMISSION VENDOR INSPECTION REPORT  
OF FRAMATOME INC. 99901300/2025-201

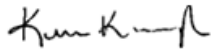
Dear Mr. Montalbano:

On January 16, 2025, the U.S. Nuclear Regulatory Commission (NRC) staff conducted an inspection at the of Framatome Inc.'s (hereafter referred to as Framatome) facility in Lynchburg, VA. The purpose of this limited-scope routine inspection was to assess Framatome's compliance with selected portions of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 73.21, "Protection of Safeguards Information: Performance Requirements," 10 CFR 73.22, "Protection of Safeguards Information: Specific Requirements," and the Commission Order No. EA-07-231, "Order Imposing Safeguards Information Protection Requirements and Fingerprinting and Criminal History Records Check Requirements for Access to Safeguards Information." Specifically, this inspection evaluated Framatome's implementation of activities associated with the protection of Safeguards Information (SGI) associated with the U.S. EPR design certification. The enclosed report presents the results of the inspection. This NRC inspection report does not constitute NRC endorsement of Framatome's overall SGI program.

During this inspection, the NRC inspection team observed the physical protections and programmatic processes utilized by Framatome to protect SGI. Based on the results of this inspection, the NRC inspection team found the implementation of your SGI protection program met the requirements imposed on you by the NRC. No findings of significance 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,

  
ture Signed by Kavanagh, Kerri  
on 02/14/25  
Kerri Kavanagh, Chief  
Quality Assurance and Vendor Inspection Branch  
Division of Reactor Oversight  
Office of Nuclear Reactor Regulation

Docket No.: 99901300

EPID No.: I-2025-201-0003

Enclosure:

1. Inspection Report No. 99901300/2025-201  
and Attachment

SUBJECT: NUCLEAR REGULATORY COMMISSION VENDOR INSPECTION REPORT  
OF FRAMATOME INC. 99901300/2025-201 DATE: February 14, 2025

DISTRIBUTION:

Public  
RFelts, NRR  
PMcKenna, NRR  
ABowie, NRR  
NRR\_DRO\_IQVB\_Distribution  
victor.montalbano@framatome.com  
duane.newman@framatome.com

**ADAMS Accession No.: ML25034A271**

**NRR-106**

<b>OFFICE</b>	NRR/DRO/IQVB	NRR/DRO/IQVB
<b>NAME</b>	DPark	KKavanagh
<b>DATE</b>	2/ 6/2025	2/14/2025

**OFFICIAL RECORD COPY**



## **EXECUTIVE SUMMARY**

Framatome Inc.  
99901300/2025-201

The U.S. Nuclear Regulatory Commission (NRC) staff conducted a vendor inspection at the Framatome Inc. (hereafter referred to as Framatome) facility in Lynchburg, VA to verify that it had implemented an adequate Safeguards Information (SGI) protection program that complies with selected portions of Title 10 of the *Code of Federal Regulations* (10 CFR) 73, "Physical Protection of Plants and Materials." This inspection specifically evaluated Framatome's implementation of SGI protection activities associated with maintaining the physical security of the information by access control and the intellectual security by screening the users of the SGI prior to granting access to it. The NRC inspection team conducted this inspection onsite on January 16, 2025.

The following regulations serve as the bases for the NRC inspection:

- 10 CFR 73.21, "Protection of Safeguards Information: Performance Requirements"
- 10 CFR 73.22, "Protection of Safeguards Information: Specific Requirements"
- EA-07-231, "Order Imposing Safeguards Information Protection Requirements and Fingerprinting and Criminal History Records Check Requirements for Access to Safeguards Information."

During this inspection, the NRC inspection team implemented inspection procedure (IP) 81811, "Protection of Safeguards Information by Design Certification Applicants and Vendors," dated April 8, 2020.

In accordance with the IP, the NRC inspection team conducted the following activities:

- Observed the physical security measures Framatome has in place to control access to the SGI;
- Reviewed Framatome procedures for governing the handling of SGI and granting access to individuals;
- Reviewed and discussed the internal audit of Framatome's SGI Program;
- Conducted interviews with Framatome staff to assess knowledge of processes and procedures; and
- Reviewed personnel records for screening of users to grant access to SGI.

The NRC inspection team concluded that Framatome's SGI protection policies and implementing procedures comply with the applicable requirements of 10 CFR Part 73 and the Commission's Order; and that Framatome's personnel are implementing these policies and procedures effectively. No findings of significance were identified.

## REPORT DETAILS

### 1. Information Protection System

#### a. Inspection Scope

The NRC inspection team reviewed Framatome's policies and implementing procedures that govern the information protection system to ensure it conforms to the applicable measures specified in Title 10 the *Code of Federal Regulations* (10 CFR) 73.22, "Protection of Safeguards Information: Specific requirements," and the subsequently published Commission Order EA-07-231, "Order Imposing Safeguards Information Protection Requirements and Fingerprinting and Criminal History Records Check Requirements for Access to Safeguards Information."

The NRC inspection team discussed the program with Framatome's management and staff. The attachment to this inspection report lists the Framatome documents reviewed, and the Framatome staff interviewed by the NRC inspection team.

#### b. Observations and Findings

No findings of significance were identified.

#### c. Conclusion

The NRC inspection team concluded that Framatome established its Information Protection System in accordance with the regulatory requirements of 10 CFR 73.22. Based on the limited sample of observations, the NRC inspection team also determined that Framatome is effectively implementing its policies and procedures associated with the Information Protection System. No findings of significance were identified.

### 2. Access to SGI

#### a. Inspection Scope

The NRC inspection team reviewed Framatome's policies and implementing procedures that govern the access to SGI program to verify compliance with the requirements of 10 CFR 73.22(b). The NRC inspection team verified that Framatome program conforms to the following:

- Personnel must have a need-to-know
- Personnel must have favorably completed a criminal history records review
- Personnel are deemed 'trustworthy and reliable', based on a Commission approved review method

The NRC inspection team discussed the program with Framatome's management and staff. The attachment to this inspection report lists the Framatome documents reviewed, and the Framatome staff interviewed by the NRC inspection team.

b. Observations and Findings

During the review of personnel records for access to SGI, the NRC inspection team identified 2 missing personnel records. The room access records indicated that one of the two individuals with missing personnel records never entered the SGI space. The other individual accessed the SGI room, but there was objective evidence that this individual was given SGI access by the Framatome Reviewing Official at the time. Because there was no actual spillage of SGI beyond an authorized person, this issue was determined to have a minor significance and captured in Framatome's Condition Report (CR)-2025-0107.

c. Conclusion

The NRC inspection team concluded that Framatome established its access to SGI system in accordance with the with the regulatory requirements of 10 CFR 73.22(b). Based on the limited sample of information reviewed, the NRC inspection team also determined that Framatome is effectively implementing its policies and procedures associated with access to SGI. No findings of significance were identified.

3. Protection of SGI

a. Inspection Scope

The NRC inspection team reviewed Framatome's policies and implementing procedures that govern the protection of SGI to verify compliance with the requirements of 10 CFR 73.22(c)(1) and 10 CFR 73.22(c)(2). The NRC inspection team observed the storage area, cabinet, locks, and work area where SGI is utilized to confirm that these items met the requirements of these regulations.

The NRC inspection team discussed the program with Framatome's management and staff. The attachment to this inspection report lists the Framatome documents reviewed, and the Framatome staff interviewed by the NRC inspection team.

b. Observation and Findings

No findings of significance were identified.

c. Conclusion

The NRC inspection team concluded that Framatome established its protection of SGI system in accordance with the regulatory requirements of 10 CFR 73.22(c)(1) and 10 CFR 73.22(c)(2). Based on its observations, the NRC inspection team determined that Framatome is effectively implementing its policies and procedures associated with its protection of SGI. No findings of significance were identified.

4. Processing, Reproducing, and Transmitting SGI

a. Inspection Scope

The NRC inspection team reviewed Framatome's policies and implementing procedures that govern the processing, reproducing and transmitting of SGI to verify compliance with the requirements of 10 CFR 73.22(g)(1), 10 CFR 73.22(g)(2), 10 CFR 73.22(e), and 10 CFR

73.22(f)(1). Specifically, the NRC inspection team reviewed Framatome's procedures and processes for handling, packaging and receipt, process for sending and receiving, and for reproduction against the requirements in these regulations and the Order.

b. Observation and Findings

No findings of significance were identified.

c. Conclusion

The NRC inspection team concluded that Framatome established its protection of SGI system in accordance with the regulatory requirements of 10 CFR 73.22(g)(1), 10 CFR 73.22(g)(2), 10 CFR 73.22(e), and 10 CFR 73.22(f)(1). Based on its observations, the NRC inspection team determined that Framatome is effectively implementing its policies and procedures associated with the processing, reproducing and transmitting of SGI. No findings of significance were identified.

5. Marking of SGI

a. Inspection Scope

The NRC inspection team reviewed Framatome's policies and implementing procedures that govern the marking of SGI to verify compliance with the requirements of 10 CFR 73.22(d)(1), and 10 CFR 73.22(d)(2). Specifically, the NRC inspection team sampled SGI Framatome documents and verified that these documents and transmittal cover letters are properly marked in accordance with regulatory requirements.

The NRC inspection team discussed the program with Framatome's management and staff. The attachment to this inspection report lists the Framatome documents reviewed, and the Framatome staff interviewed by the NRC inspection team.

b. Observation and Findings

No findings of significance were identified.

c. Conclusion

The NRC inspection team concluded that Framatome established its protection of SGI system in accordance with the regulatory requirements of 10 CFR 73.22(d)(1), and 10 CFR 73.22(d)(2). Based on its observations, the NRC inspection team determined that Framatome is effectively implementing its policies and procedures associated with marking of SGI. No findings of significance were identified.

6. Removal of SGI and Destruction

a. Inspection Scope

The NRC inspection team reviewed Framatome's policies and implementing procedures that govern the removal and destruction of SGI for Framatome to verify compliance with the requirements of 10 CFR 73.22(h) and 10 CFR 73.22(i). Specifically, the NRC inspection team confirmed that Framatome policies and implementing procedures include reviews of

SGI documents to determine whether the documents continue to meet SGI classification criteria and provide for the removal and destruction of SGI documents.

The NRC inspection team discussed the program with Framatome's management and staff. The attachment to this inspection report lists the Framatome documents reviewed, and the Framatome staff interviewed by the NRC inspection team.

b. Observation and Findings

No findings of significance were identified.

c. Conclusion

The NRC inspection team concluded that Framatome established its protection of SGI system in accordance with the regulatory requirements of 10 CFR 73.22(h) and 10 CFR 73.22(i). Based on its observations, the NRC inspection team determined that Framatome is effectively implementing its policies and procedures associated with the removal and destruction of SGI. No findings of significance were identified.

7. Entrance and Exit

On January 16, 2025, the NRC inspection team presented the inspection scope during an entrance meeting with Tony Robinson, Chief Executive Officer, and other members of Framatome's staff. On January 16, 2025, the NRC inspection team presented the inspection results with Victor Montalbano, Vice-President of Quality, Performance and Safety, and other members of Framatome's 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

<b>Name</b>	<b>Position</b>	<b>Affiliation</b>	<b>Entrance</b>	<b>Exit</b>	<b>Interviewed</b>
Tony Robinson	Chief Executive Officer	Framatome	X		
Victor Montalbano	Vice-President, Quality, Performance and Safety	Framatome	X	X	
Duane Newman	Manager, Quality Programs & Supplier Oversight	Framatome	X	X	
Alan Thomas	Installed Base Business - Products and Engineering Group (IBPE)	Framatome	X*		
Darren Wood	IBPE Engineering Director SGI Program Manager	Framatome	X	X	X
Rhoda Lane	Licensing Manager SGI Custodian	Framatome	X	X	X
Tim Schmitt	Manager, Materials & Structural Analysis	Framatome	X		
Gayle Elliot	Director, Licensing & Regulatory Affairs	Framatome	X*	X	
Jamey Laughlin	Quality Specialist	Framatome	X	X	
Amy St. John	Quality Specialist	Framatome	X	X	
Vicki Hensley	Reviewing Official	Framatome			X
Kerri A. Kavanagh	Branch Chief	Nuclear Regulatory Commission (NRC)		X*	
Dong Park	Inspector	NRC	X	X	

### 2. INSPECTION PROCEDURES USED

Inspection Procedure (IP) 81811, "Protection of Safeguards Information by Design Certification Applicants and Vendors," dated April 8, 2020.

3. LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Item Number	Status	Type	Description
99901300/2021-201-01	Open	Notice of Nonconformance	Criterion XVI,

4. DOCUMENTS REVIEWED

- Document No: 1902-14, "Framatome, Inc Control of Safeguards Information," Revision 012
- SGI Qualification List, dated May 9, 2024
- Framatome Inc Safeguard Information Program Review, Internal Audit 23-10, Audit Plan, dated June 27, 2023
- Framatome Inc. Safeguard Information Program Review, Internal Audit 23-10, Checklist, Revision 8, dated November 2020
- Framatome Inc. Safeguard Information Program Review, Internal Audit 23-10, Report of QA Audit, Revision 1, dated November 2020
- File No: A011PR4000, "SGI Memo of Designation," dated December 7, 2022
- SWH13, "Personnel Admitted at Doors Report," as of January 16, 2025
- Email from Randy Ford to Crystal Carter Subject: SGI Clearance, dated November 24, 2020
- NRC:21:001, Letter from Gary Peters to Director, Division of Security Operations, dated January 8, 2021
- NRC Letter from Ngola Otto to Gary Peters, dated August 24, 2021
- CR-2020-1506
- CR-2025-0107
- CR-2025-0108
- SGI Access Authorization Qualification Record for Darren Wood
- SGI Access Authorization Qualification Record for Tim Schmitt
- SGI Refresher Training Record as of January 16, 2025