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

September 30, 2025

Mr. Stuart Brown
Director
Element Materials Technology
7800 Highway 20 West
Huntsville, AL 35806

SUBJECT: NUCLEAR REGULATORY COMMISSION INSPECTION REPORT OF ELEMENT MATERIALS TECHNOLOGY NO. 99900905/2025-201, AND NOTICE OF NONCONFORMANCE

Dear Mr. Brown:

On August 18-22, 2025, the U.S. Nuclear Regulatory Commission (NRC) staff conducted an inspection at the Element Materials Technology facility (hereafter referred to as Element) in Huntsville, AL. The purpose of this limited-scope routine inspection was to assess Element'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."

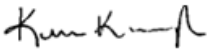
This technically-focused inspection specifically evaluated Element's implementation of the quality activities associated with the supply of safety-related testing services for U.S. nuclear power plants. In addition, the NRC inspection team evaluated Element's (formerly known as NTS) closure of the inspection findings documented in inspection report No. 99900905/2021-201, dated November 19, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21319A392). The enclosed report presents the results of the inspection. This NRC inspection report does not constitute NRC's endorsement of Element'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 failed to meet certain NRC requirements imposed on you by your customers or NRC licensees. Specifically, the NRC inspection team determined that Element was not fully implementing its QA program in the area of corrective actions. The specific finding and references to the pertinent requirements are identified in the enclosures to this letter. In response to the enclosed Notice of Nonconformance (NON), Element should document the results of the extent of condition review for this finding and determine if there are any effects on other safety-related components.

Please provide a written statement or explanation within 30 days 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, 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).

Sincerely,


Signed by Kavanagh, Kerri
on 09/30/25

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

Docket No.: 99900905

EPID No.: I-2025-201-0023

Enclosures:

1. Notice of Nonconformance
2. Inspection Report No. 99900905/2025-201 and Attachment

SUBJECT: NUCLEAR REGULATORY COMMISSION INSPECTION REPORT OF ELEMENT MATERIALS TECHNOLOGY NO. 99900905/2025-201, AND NOTICE OF NONCONFORMANCE DATE: September 30, 2025

DISTRIBUTION:
ABowie, NRR
PMcKenna, NRR
NRR_DRO_IQVB Distribution
stuart.brown@element.com
chris.covan@element.com

ADAMS Accession No.: ML25262A059 **NRR-106**

OFFICE	NRR/DRO/IQVB	NRR/DRO/IQVB	NRR/DRO/IQVB
NAME	FVega	YDiaz-Castillo	AKeim
DATE	9/19/2025	9/22/2025	9/23/2025
OFFICE	NRR/DRO/IQVB	NRR/DRO/IRAB	NRR/DRO/IQVB
NAME	LO'Donoghue	EBrothman	KKavanagh
DATE	9/23/2025	9/23/2025	9/30/2025

OFFICIAL RECORD COPY

NOTICE OF NONCONFORMANCE

Element Materials Technology
7800 Highway 20 West
Huntsville, AL 35806

Docket No. 99900905
Report No. 2025-201

Based on the results of a U.S. Nuclear Regulatory Commission (NRC) inspection conducted at the Element Materials Technology (hereafter referred to as Element) facility in Huntsville, AL, from August 18, 2025, through August 22, 2025, Element did not conduct certain activities in accordance with NRC requirements that were contractually imposed upon Element by its customers or NRC licensees:

Criterion XVI, "Corrective Action," 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, in part, that "Measures shall be established to ensure 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."

Element's procedure No. QAP-HSV 16-1, "Corrective Preventive Action Program," Revision 6, dated November 29, 2023, provides instructions for the identification and initiation of a corrective/preventive action report (CPAR), investigation of the problem for cause, implementation of corrective actions, and evaluation of the effectiveness of the corrective action.

Section 4.1, "Monitoring Open Corrective Preventative Action Request," of QAP HSV 16-1 states, in part, that "On the first day of each week, the Quality Assurance personnel should review the list of open CPARs. If a CPAR expected completion/suspense date is due that week, the QA shall direct the person who prepared the CPAR to follow-up with the responsible Department Manager to ensure that the CPAR is closed out in a timely manner."

Section 6.0, "Verification of Effectiveness," of QAP-HSV 16.1 states, in part, that "Quality Assurance shall review the response for adequacy and shall verify its implementation. Each of the corrective actions taken shall be reviewed to ensure that the cause and scope of the adverse condition have been properly identified, all work, and activities in-process have been corrected, and the corrective action taken to prevent recurrence is adequate. Each of the actions documented in the response shall be verified to assure that they have been properly implemented."

Contrary to the above, as of August 22, 2025, Element failed to ensure that conditions adverse to quality are promptly identified and corrected, and for significant conditions adverse to quality (SCAQ), failed to take corrective actions to preclude repetition. Element identifies all safety-related CPARs as SCAQs, requiring an evaluation and timely resolution. Specifically:

1. Element's quality assurance (QA) personnel failed to consistently perform a weekly review of open CPARs, and failed to direct the person who prepared the CPAR to follow-up with the responsible Department Manager to ensure that CPARs are closed out in a timely manner.

2. Element did not establish a timeliness metric for closing SCAQs or assigned personnel to be responsible for the implementation of the corrective action program. As a result, a total of eight CPARs from 2024 and 2025 are still open.

3. Element's QA personnel failed to verify the implementation of corrective actions to ensure proper implementation and effectiveness to prevent repetition. CPAR No. 24-038, opened in November 2024, and CPAR No. 25-006, opened in January 2025, were initiated to address issues identified in the training and qualification tracking system, including overdue qualifications, missing records, and discrepancies. The corrective actions identified in CPARs Nos. 24-038 and 25-006 were completed, but the NRC inspection team found that the qualification records of two test technicians performing safety-related testing were expired or not available.

   This issue has been identified as Nonconformance 99900905/2025-201-01.

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 noncompliance; and (4) the date when your corrective actions will be completed. Where good cause is shown, consideration will be given to 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 (SGI) 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 basis 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 SGI 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 30th day of September 2025.

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

Docket No.:	99900905
Report No.:	99900905/2025-201
Vendor:	Element Materials Technology 7800 Highway 20 West Huntsville, AL 35806
Vendor Contact:	Mr. Chris Covan Quality Assurance Manager Email: Chris.Covan@element.com Phone: (256) 837-4411
Nuclear Industry Activity:	Element Material Technology's (hereafter referred to as Element) scope of supply for the U.S. nuclear power plants includes third party seismic and environmental qualification, measurement and testing equipment calibration services, safety relief valve and snubber testing/refurbishment, and third-party dedication of seismic and environmentally qualified level transmitters, relays, digital recorders, and circuit breakers. This was the third U.S Nuclear Regulatory Commission inspection of Element (previously known as NTS) at their facility in Huntsville, AL.
Inspection Dates:	August 18-22, 2025

Inspectors:			
	Frankie Vega	NRR/DRO/IQVB	Team Leader
	Yamir Diaz-Castillo	NRR/DRO/IQVB	Inspector
	Andrea Keim	NRR/DRO/IQVB	Inspector
	Liam O'Donoghue	NRR/DRO/IQVB	Trainee

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

EXECUTIVE SUMMARY

Element Materials Technology
Report No. 99900905/2025-201

The U.S. Nuclear Regulatory Commission (NRC) staff conducted a limited-scope routine vendor inspection at the Element Materials Technology (hereafter referred to as Element) facility in Huntsville, AL, 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." The NRC inspection team conducted this inspection on-site during the week of August 18-22, 2025. This was the third NRC inspection of Element at this facility.

This technically focused inspection specifically evaluated Element's implementation of quality activities associated with safety-related testing provided to U.S. nuclear power plants.

Specific activities observed by the NRC inspection team included:

- Commercial-grade dedication of a Yokogawa DX1006N recorder for Energy Harbor
- Testing of spring-operated safety relief valves for Florida Power & Light
- Vibrational testing of the squib valve initiators for Westinghouse Electric Company
- Calibration of a caliper

These regulations served as the basis 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, and IP 36100, "Inspection of 10 CFR Part 21 and Programs for Reporting Defects and Noncompliance," dated February 10, 2023.

With the exception of the nonconformance described below, the NRC inspection team concluded that Element'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 Element's personnel are implementing these policies and procedures effectively. The results of this inspection are summarized below.

Corrective Action

The NRC inspection team issued Nonconformance 99900905/2025-201-01 in association with Element's failure to implement the regulatory requirements of Criterion XVI, "Corrective Actions," of Appendix B to 10 CFR Part 50. Nonconformance 99900905/2025-201-01 cites Element 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.

The NRC inspection team reviewed the corrective actions that Element (formerly known as NTS) took to address Nonconformances 99900905/2021-201-01 and 99900905/2021-201-02, documented in inspection report No. 99900905/2021-201, dated November 19, 2021. The NRC inspection team reviewed the documentation that provided the objective evidence that all the corrective actions were completed and adequately implemented. Based on this review, the NRC inspection team closed Nonconformances 99900905/2021-201-01 and 99900905/2021-201-02.

Other Inspection Areas

The NRC inspection team determined that Element established its programs for commercial-grade dedication, procurement document control, supplier oversight, test control, control of measuring and test equipment, 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 Element is implementing its policies and procedures associated with these programs. In addition, the NRC inspection team determined that Element 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. Nonconforming Materials, Parts, or Components and Corrective Action

   a. Inspection Scope

   The NRC inspection team reviewed Element Material Technology's (hereafter referred to as Element) policies and implementing procedures that govern the implementation of its nonconforming materials, parts, or components and corrective action programs to verify compliance with the requirements of Criterion XV, "Nonconforming Materials, Parts, or Components," and Criterion XVI, "Corrective Action," 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.

   The NRC inspection team verified that Element's processes and procedures provide for the identification, documentation, segregation, evaluation, and disposition of nonconforming items. Element uses two processes for evaluating and dispositioning nonconformances. A nonconforming material report (NMR) is used for nonconforming material, items, and services found during receipt and commercial-grade dedication inspections or testing. A notice of deviation (NOD) is used to document and control anomalous conditions related to a test specimen, test procedure and/or test equipment, and are included as part of the project test report. The NRC inspection team reviewed a sample of NMRs and NODs associated with safety-related items and testing to confirm that Element: (1) dispositioned the NMRs and NODs in accordance with the appropriate procedures; (2) documented adequate technical justification for the disposition; and 3) took appropriate corrective actions.

   In addition, the NRC inspection team reviewed a sample of corrective/preventative action requests (CPARs) and confirmed that they contain: (1) adequate documentation and description of conditions adverse to quality; (2) an appropriate analysis of the cause of the conditions and corrective actions taken; (3) review and approval by the responsible authority; and (4) current status of the corrective action.

   The NRC inspection team reviewed that Element's processes and procedures for NMRs, NODs, and CPARs provide a link to the 10 CFR Part 21, "Reporting of Defects and Noncompliance," program for applicability and appropriate evaluation.

   The NRC inspection team also reviewed Element's corrective actions in response to Nonconformances 99900905/2021-201-01 and 99900905/2021-201-02, identified in the NRC's inspection report (IR) No. 99900905/2021-201, dated November 19, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21319A392).

   The NRC inspection team also discussed the nonconforming materials, parts, or components and corrective action programs with Element'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 discussed with quality assurance (QA) personnel the weekly review of open CPARs, described in Section 4.1, “Monitoring Open Corrective Preventative Action Request,” of QAP-HSV 16-1, “Corrective Preventive Action Program,” Revision 6, dated November 29, 2023. The NRC inspection team identified that the QA personnel failed to consistently perform a weekly review of open CPARs and failed to direct the person who prepared the CPAR to follow-up with the responsible Department Manager to ensure that CPARs are closed out in a timely manner.

As part of the review of a sample of CPARs, the NRC inspection team identified that of the nine safety-related CPARs opened in 2024, four remain open. In addition, of the 21 safety-related CPARS opened in 2025, four remain open. Element identifies all safety-related CPARs as significant conditions adverse to quality (SCAQs) requiring evaluation and timely resolution. However, Element did not establish a timeliness metric for closing SCAQs or assigned personnel to be responsible for the implementation of the corrective action program. As a result, a total of eight CPARs from 2024 and 2025 are still open.

The NRC inspection team noted that several CPARs listed their corrective actions as completed but were still open awaiting verification of their effectiveness. In some cases, not all corrective actions were implemented effectively. Specifically, CPAR No. 24-038, opened in November 2024, and CPAR No. 25-006, opened in January 2025, were initiated to address issues identified in the training and qualification tracking system, including overdue qualifications, missing records, and discrepancies. Even though the corrective actions identified in CPAR Nos. 24-038 and 25-006 were completed, Element’s effectiveness review, as required by implementing procedure QAP-HSV 16.1, had not been completed. Some of the corrective actions identified in CPAR Nos. 24-038 and 25-006 included: (1) performing training for department managers to emphasis the frequency requirements and importance of qualification reviews; (2) developing and maintaining a training matrix listing all training and qualification requirements for safety related activities; and (3) assigning division management the execution of requalification activities. These corrective actions were ineffective in preventing repetition and were not verified for completion, adequacy, and effectiveness. Specifically, the NRC inspection team found that the qualification records of two test technicians that were to perform safety-related testing were expired or not available. Since these qualification records were not available, Element had to stop all work related to this testing until appropriate actions were taken to ensure re-qualification of these technicians was completed.

The NRC inspection team identified these issues as Nonconformance 99900905/2025-201-1 for Element’s failure to ensure that conditions adverse to quality are promptly identified and corrected, and failure to take corrective actions to preclude repetition. Element initiated CPARs No. 25-025 and 25-035 to address this issue.

Corrective Actions Associated with Nonconformance 99900905/2021-201-01

Following the October 2021 NRC inspection as documented in IR No. 99900905/2021-201, the NRC issued Nonconformance 99900905/2021-201-01 for Element’s failure to establish adequate measures for source evaluation and selection to verify the effectiveness of the control of quality by contractors and subcontractors to assure that purchased services conform to the procurement documents. Specifically, Element did

not perform an on-site commercial-grade survey of a supplier of calibration services, instead, they performed a fully remote commercial-grade survey of the calibration supplier.

In its responses dated November 30, 2021, and January 7, 2022 (ADAMS Accession Nos. ML21354A018 and ML22020A136, respectively), Element stated that a commercial grade survey of the calibration vendor was not required because the vendor was accredited with the 2017 edition of the International Standard Organization (ISO)/International Electrotechnical Commission (IEC) 17025, "General Requirements for the Competence of Testing and Calibration Laboratories." The NRC inspection team reviewed the documentation that provided the objective evidence for the completion of the corrective actions, including a review of CPAR No. 21-035, the calibration certificate, written email statements, and purchase orders (POs). Element removed the reference of a remote survey, and verified that POs for the vendor met the requirements of Nuclear Energy Institute (NEI) 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 (SE) dated November 23, 2020 (ADAMS Accession No. ML20322A019). The NRC inspection team confirmed that the POs for calibration services include the appropriate requirements in accordance with the process documented in NEI 14-05A, Revision 1.

The NRC inspection team determined that Element's corrective actions were adequately implemented to address Nonconformance 99900905/2021-201-01. Based on its review, the NRC inspection team closed Nonconformance 99900905/2021-201-01.

Corrective Actions Associated with Nonconformance 99900905/2021-201-02

Following the October 2021 NRC inspection, the NRC issued Nonconformance 99900905/2021-201-02 for Element's failure to promptly correct conditions adverse to quality. Specifically, Element failed to implement corrective actions to address Nonconformance 99900905/2015-202-01 as documented in CPAR No. 15-019. In CPAR No. 15-019, Element committed to establish a formal written procedure with data sheets for the performance of routine pre-test and post-test verification checks (spanning) of test equipment. Nonconformance 99900905/2015-202-01 was issued by the NRC during an inspection in 2015 and was documented in NRC's IR No. 99900905/2015-202, dated June 25, 2015 (ADAMS Accession No. ML15152A080).

In its response dated November 30, 2021, Element stated that it would write a procedure to address the activities being performed of routine pre-test and post-test verification checks of test equipment and train personnel on the procedure.

The NRC inspection team reviewed the documentation that provided the objective evidence for the completion of the corrective actions, including a review of CPAR No. 21-031. Element developed procedure No. QAP HSV 12-2, "Measurement Check Program," Revision 2, dated November 29, 2023, to provide a standard method to verify instruments and test setup are measuring correctly. The NRC inspection team reviewed the procedure, datasheet, and training logs associated with the corrective actions documented in CPAR No. 21-031.

The NRC inspection team determined that Element's corrective actions were adequately

implemented to address Nonconformance 99900905/2021-201-02. Based on its review, the NRC inspection team closed Nonconformance 99900905/2021-201-02.

c. Conclusion

The NRC inspection team issued Nonconformance 99900905/2025-201-01 in association with Element's failure to implement the regulatory requirements of Criterion XVI of Appendix B to 10 CFR Part 50. Nonconformance 99900905/2025-201-01 cites Element 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.

2. Test Control

a. Inspection Scope

The NRC inspection team reviewed Element'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. The NRC inspection team witnessed ongoing testing of spring-operated safety relief valves (SRV) for the St. Lucie Plant, and vibration testing (eight years qualified life simulation) of 12 squib valve initiator assemblies for Westinghouse Electric Company (WEC). The vibration testing, which includes accelerated vibration aging of two- and eight-years qualified life simulation, is part of the supplemental qualification for the 12 squib valve cartridge initiators. In addition to vibration testing, WEC contracted Element to perform thermal testing, which includes thermal aging, soak, and cycle. At the time of the inspection, Element had completed the two year vibration and thermal testing, but the test report was still being developed by Element.

The NRC inspection team verified that Element's test procedures adequately included the technical, quality, and regulatory requirements identified in the associated customer POs and technical specifications. The NRC inspection team also verified that Element's test procedures provided an adequate description of the test responsibilities, objectives, sequences, instructions, parameters, measurement and test equipment (M&TE) usage, acceptance criteria, and posttest activities.

The NRC inspection team confirmed the tests were performed using properly calibrated M&TE and verified that Element'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 reviewed the training and qualification records for the test technicians involved with the SRV and initiator testing.

The NRC inspection team discussed the test control program with Element'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 Element 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 Element is implementing its policies and procedures associated with the control of special processes program. No findings of significance were identified.

3. Procurement Document Control and Supplier Oversight

a. Inspection Scope

The NRC inspection team reviewed Element'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, "Control of Purchased Material, Equipment, and Services," of Appendix B to 10 CFR Part 50. The NRC inspection team reviewed a sample of POs, Element's Approved Suppliers List (ASL), supplier audit reports, and annual evaluations.

For the sample of POs reviewed, the NRC inspection team verified that the POs included, as appropriate: scope of work, right of access to the suppliers' facilities, and conditions and restrictions imposed on sub-suppliers. The NRC inspection team confirmed that the POs adequately invoked the applicable technical, regulatory, and quality requirements.

The NRC inspection team selected a sample of suppliers from the ASL 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 the following: (1) the audit reports included an audit plan; (2) audits were performed according to established frequency; (3) audit reports included adequate documented objective evidence of compliance with the applicable requirements; and (4) audit documentation was reviewed by Element's responsible management.

The NRC inspection team also discussed the procurement document control and supplier oversight programs with Element'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

During the review of Element's ASL, the NRC inspection team noted that no limitations or exceptions were listed in the ASL for any of their safety-related suppliers. As part of its review of a supplier's commercial-grade survey (CGS), the NRC inspection team noted that two findings were identified that led to the addition of restrictions on a PO for

this supplier. The NRC inspection team noted that these restrictions were not documented in the ASL for this supplier. The NRC inspection team also noted that procedure No. QAP HSV 07-1, "Supplier Evaluation and Approved Suppliers List," Revision 11, dated November 29, 2023, does not provide clear guidance on the inclusion of limitations or restrictions in the ASL. The NRC inspection team determined this issue to be minor because restrictions associated with the referenced CGS findings were included in recently issued POs to this supplier. Element initiated CPAR No. 25-026 to address this issue.

During the review of external audits, the NRC inspection team noted there was no objective evidence demonstrating that a Nuclear Industry Assessment Corporation (NIAC) audit No. 31514 was reviewed and accepted by Element's quality assurance (QA) staff, consistent with procedure No. QAP HSV 18-1, "Scheduling, Conducting, and Reporting Quality Audits," Revision 9, dated November 29, 2023. Section 6.17, "Third-Party Audits/Contract Audits/Remote Audits," of QAP HSV 18-1, states, in part, that "Third Party audit/surveys (e.g. NIAC Audits) when conducted shall be reviewed and approved by Lead Auditor or the QA Director. The review shall include a review of all the closed findings and Lead Auditors' qualifications. The review shall be documented by memorandum to the audit files." The NRC inspection team determined this issue to be minor because, based on the limited sample of external audits reviewed, this was the only instance found by the NRC inspection team in which Element had not performed this evaluation. Further, no findings were identified as a result of this NIAC audit. Element initiated CPAR No. 25-034 to address this issue.

The NRC inspection team noted that for one safety-related PO issued to a supplier of calibration services, Element did not include the applicable quality requirements in accordance with section 3.0 of procedure No. QAP HSV 04-1, "Procurement of Safety Related Commercial Grade Materials, Services and Instrumentation," Revision 11, dated November 29, 2023. The NRC inspection team determined this issue to be minor since the results of an extend of condition review performed by Element during the week of the inspection determined this to be an isolated event. Also, the most recent audit report for this calibration supplier demonstrates that the supplier has a QA program that meets the applicable requirements of Appendix B to 10 CFR Part 50. Element initiated CPAR No. 25-029 to address this issue.

c. Conclusion

With the exception of the minor issues identified above, the NRC inspection team concluded that Element 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 Element is implementing its policies and procedures associated with the procurement document control and supplier oversight programs. No findings of significance were identified.

4. Commercial-Grade Dedication

a. Inspection Scope

The NRC inspection team reviewed Element'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, “Design Control,” and Criterion VII of Appendix B to 10 CFR Part 50.

The NRC inspection team reviewed a sample of CGD packages for the following items: (1) solenoid valve; (2) time delay relay; (3) software used for safety-related calculations; (4) Yokogawa recorder; and (5) calibration services. Within these CGD packages, the NRC inspection team reviewed the following documents: (1) POs; (2) technical evaluations and Failure Modes and Effect Analyses; (3) sampling plans and associated technical basis (when applicable); (4) inspection reports; and (5) Certificates of Conformance.

The NRC inspection team evaluated the criteria for the identification of item functions, credible failure mechanisms/modes, selection of critical characteristics and acceptance criteria, and the identification of verification methods to verify effective implementation of Element’s CGD process. The NRC inspection team also reviewed a sample of commercial-grade surveys (CGSs) and confirmed that the CGSs contained the objective evidence necessary to demonstrate that the commercial vendors are implementing adequate controls for the critical characteristics identified by Element.

The NRC inspection team also observed an Element technician perform CGD activities associated with a Yokogawa DX1006N recorder The NRC inspection team verified that: (1) the critical characteristics and acceptance methods were adequately specified; (2) the drawings and material specifications contained the associated acceptance criteria for each critical characteristic; and (3) the inspection reports adequately documented the acceptance of the critical characteristics. In addition, the NRC inspection team confirmed that the technician was using calibrated M&TE to take the appropriate measurements. Furthermore, the NRC inspection team reviewed the training and qualification records of the technician and confirmed that he was adequately trained and qualified in accordance with Element’s policies and procedures.

The NRC inspection team reviewed Element’s measures for using the International Laboratory Accreditation Cooperation (ILAC) accreditation process in lieu of performing commercial-grade surveys for the procurement of calibration and testing services as part of the CGD process. Element implements this process as described in NEI 14-05.

The NRC inspection team also discussed the CGD program with Element’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 Element’s implementation of the ILAC accreditation process as part of the CGD of calibration services, the NRC inspection team identified that it is not being adequately implemented in accordance with the requirements of Revision 1 of NEI 14-05A and the NRC’s SE. One of the conditions from the NRC’s SE states that: “It is validated, at receipt inspection, that the laboratory’s documentation certifies that: (a) the contracted calibration or test services has been performed in accordance with the laboratory’s 2017 edition of ISO/IEC 17025 and (b) the purchase order’s requirements are met.” To meet requirement (b), Element requires the laboratory to provide a Certificate of Conformance (CoC) stating the PO requirements were met. However, for three out of four CGD packages of calibration services, the NRC inspection team noted

that the CoC was not provided, and Element did not identify this as a deficiency during receipt inspection.

The NRC inspection team determined this issue to be minor because: (1) it is a documentation issue; (2) there was no adverse impact on the calibration services; and (3) the NRC inspection team confirmed the laboratories were accredited to the 2017 edition of ISO/IEC 17025. Element initiated CPAR No. 25-032 to address this issue.

c. Conclusion

With the exception of the minor issue identified above, the NRC inspection team concluded that Element 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 Element is implementing its policies and procedures associated with the control of special processes program. No findings of significance were identified.

4. Control of Measuring and Test Equipment

a. Inspection Scope

The NRC inspection team reviewed Element's policies and implementing procedures that govern the implementation of its 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.

The NRC inspection team performed a walk-through of Element's calibration laboratory and interviewed the on-site calibration manager and technician. 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 confirmed that when M&TE is found to be out of calibration, Element initiates an NMR and performs an evaluation to determine the extent of condition.

The NRC inspection team observed the calibration of a caliper and reviewed the calibration procedure, the records for the standard used to calibrate the caliper, and the final certificate of calibration issued for the caliper. The NRC inspection team confirmed that the calibration was done in accordance with Element's applicable calibration procedures and that the caliper was adequately calibrated.

The NRC inspection team also discussed the M&TE program with Element'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 Element 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 Element is implementing its policies and procedures associated with the M&TE program. No findings of significance were identified.

5. Internal Audits

a. Inspection Scope

The NRC inspection team reviewed Element'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 reviewed a sample of Element's internal audit reports conducted in 2022, 2023, and 2024 and verified that: (1) internal audits were performed by qualified auditors; (2) lead auditors prepared and approved plans that identified the audit scope and checklist criteria prior to the audit; (3) internal audits contained adequate documented objective evidence; (4) internal audits were performed by personnel not having direct responsibilities in the areas being audited; and (5) internal audit results were reviewed by Element's responsible management. In addition, the NRC inspection team confirmed that audit findings were dispositioned, and corrective actions were implemented to correct the issues identified.

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

6. 10 CFR Part 21 Program

a. Inspection Scope

The NRC inspection team reviewed Element's policies and implementing procedures that govern the implementation of its 10 CFR Part 21 program to verify compliance with the regulatory requirements. The NRC inspection team evaluated the 10 CFR Part 21 postings and a sample of Element's POs for compliance with the requirements of 10 CFR 21.6, "Posting Requirements," and 10 CFR 21.31, "Procurement Documents." For a sample of 10 CFR Part 21 evaluations performed by Element, the NRC inspection team verified that Element 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,"Notification of failure to comply or existence of a defect and its evaluation," as applicable.

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

7. Entrance and Exit Meetings

On August 18, 2025, the NRC inspection team discussed the scope of the inspection with Mr. Stuart Brown, Director, and other members of Element's management and technical staff. On August 22, 2025, the NRC inspection team presented the inspection results and observations during an exit meeting with Mr. Brown and other members of Element'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
Suart Brown	Division Director	Element Materials Technology (Element)	X	X	
Justin Nold	Safety Manager	Element	X		
Matt Lovell	Quality Assurance (QA) Manager	Element	X	X	X
Derica Taylor	Project Engineer II	Element	X	X	X
Chris Covan	Operations Manager	Element	X	X	X
Don Furhman	Electrical Engineer	Element	X		
Kyle McVay	Third Party Qualification (TPQ) Project Engineer	Element	X	X	X
Bryce Freeman	Calibration Technician	Element			X
Paul Lubeski	Senior Staff Engineer	Element			X
Tyler Thompson	QA Engineer	Element		X	
Eddie Rea	QA Representative	Element		X	
Jansen Turrentin	QA Document Control	Element		X	
Steve Felice	Calibration Manager	Element			X
Donald Malone	TPQ Technician Level 2	Element			X
Patrick Turrentine	Department Manager – Safety Relief Valve /High Flow	Element			X

Name	Title	Affiliation	Entrance	Exit	Interviewed
Jeff Vinson	Senior Test Engineer	Element			X
Jonathan Wright	Senior Test Engineer	Element			X
Doug Duvall	Mechanical Test Technician	Element			X
Michael Javins	Mechanical Test Technician	Element			X
Edward W. Drake	Principal Engineer	Westinghouse Electric Company (WEC)			X
Brian S. Gordon	Engineer	WEC			X
Frankie Vega	Inspector	Nuclear Regulatory Commission (NRC)	X	X	
Andrea Keim	Inspector	NRC	X	X	
Yamir Diaz-Castillo	Inspector	NRC	X	X	
Liam O'Donoghue	Inspector	NRC	X	X	

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
99900905/2025-201-01	OPEN	NON	Criterion XVI
99900905/2021-201-01	CLOSED	NON	Criterion VII

Item Number	Status	Type	Description
99900905/2021-201-02	CLOSED	NON	Criterion XVI

4. DOCUMENTS REVIEWED

Policies and Procedures

- Element Nuclear Huntsville Facility Nuclear Quality Policy Manual, Revision 11, dated November 16, 2023
- QAP HSV 02-2, “Qualification Program,” Revision 7, dated March 26, 2025
- QAP HSV 02-5, “Certification of Quality Audit Personnel,” Revision 7, dated November 29, 2023
- QAP HSV 03-4, “Contract Review,” Revision 7, dated November 29, 2023
- QAP HSV 04-1, “Procurement of Safety Related Commercial Grade Materials, Services, and Instrumentation,” Revision 11, dated November 29, 2023
- QAP HSV 07-1, “Supplier Evaluation and Approved Suppliers List,” Revision 11, dated November 29, 2023
- QAP HSV 07-2 “Source Surveillance and Inspection,” Revision 7, dated November 29, 2023
- QAP HSV 11-1, “Test Control Program,” Revision 5, dated November 29, 2023
- QAP HSV 12-1, “Control of Measuring and Test Equipment,” Revision 3, dated November 29, 2023
- QAP HSV 12-2, “Measurement Check Program,” Revision 2, dated November 29, 2023
- QAP HSV 15-1, “Control of Nonconforming Material, Items, and Services,” Revision 7, dated November 29, 2023
- QAP HSV 15-2, “Notice of Deviation,” Revision 8, dated November 29, 2023
- QAP HSV 16-1, “Corrective Preventive Action Program,” Revision 6, dated November 29, 2023
- QAP HSV 18-1, “Scheduling, Conducting, and Reporting Quality Audits,” Revision 9, dated November 29, 2023
- QAP HSV 19-1, “Reporting of Defects and Noncompliance Per 10 CFR Part 21,” Revision 8, dated November 29, 2023

- QAP HSV 19-1, “Reporting of Defects and Noncompliance Per 10 CFR Part 21,” Revision 9, dated August 13, 2025

- QAP HSV 21-1, “Dedication Test Procedure for Commercial Grade Calibration Services,” Revision 8, dated November 29, 2023

- QAP HSV 22-1, “Dedication of Commercial Grade Items and Services,” Revision 7, dated November 29, 2023

- QAP HSV 23-1, “Design Change Review,” Revision 3, dated November 2023

- QAP HSV 24-1, “Commercial Grade Surveys,” Revision 7, November 29, 2023

Commercial-Grade Dedication

- Dedication Plan No. PR188657DP25-01, “Third Party Qualification (TPQ) Dedication Plan for Ventfabrics Incorporated 12VG Ventglass Fabric Material,” Revision 0, dated April 4, 2025

- Element Materials Technology’s Certificate of Conformance for four Ventfabrics 12VG Fabric Duct, 12 in. X 150 ft. Roll, ID No. PR18865712VGFDT001-004, dated April 4, 2025

- Element Materials Technology’s Certificate of Conformance for two Ventfabrics 12VG Fabric Duct, 12 in. X 150 ft. Roll, ID No. PR18865712VGFDT005-006, dated July 22, 2025

- Dedication Plan No. PR156690DP22, “Third Party Equipment Dedication Plan for ASCO 212-631-1G Solenoid Operated Valve,” Revision 1, dated May 19, 2005

- Element Materials Technology’s Certificate of Conformance for six ASCO 212-631-1G solenoid valves, ID No. PR1885652126311GSOV001-006, dated May 30, 2025

- Dedication Plan No. PR150961DP22, “Third Party Qualification Dedication Plan for NTS Series 812 Time Delay Relay,” Revision 1, dated July 22, 2022

- Element Materials Technology’s Certificate of Conformance for five NTS 812-1-6-07-A Time Delay Relay, ID No. PR1891058121607ARLY001-005, dated May 14, 2025

- Test Report No. PR142392TR25, “Dedication Test Report for Vibration Research VibrationVIEW Software for use I Safety Related Calculations,” Revision 0, dated July 24, 2025

- Dedication Plan No. PR028238DP22-01SW, “Dedication Plan for Vibration Research VibrationVIEW Software for use in Safety-Related Calculations,” Revision 3, dated September 11, 2023

- Dedication Plan No. PR141617DP21, “Third Party Qualification Dedication Plan for Yokogawa DX1000N Series Recorders,” Revision 4, dated November 6, 2023

- Commercial-Grade Survey Report No. NTS/HSV-CGS-23-001, survey dates January 17-19, 2023
- Commercial-Grade Survey Report No. NTS-H-V-CGS-22-005, survey dates October 3 to 11, 2022
- Commercial-Grade Survey Report No. NTS-H-V-CGS-22-006, survey dates September 19 to 22, 2022
- Commercial-Grade Survey Report No. NTS-H-V-CGS-22-007, survey dates September 26 to 28, 2022
- Commercial-Grade Survey Report No. NTS/HSV-CGS-23-004, survey dates March 13-14, 2023
- Commercial-Grade Survey (CGS) Plan NTS/HSV-CGS-23-001, dated January 10, 2023
- NTS Survey Report No. NTS/HSV-CGS-23-001, Survey dates January 17-19, 2023
- CGS Checklist for Survey ID NTS/HSV-CGS-23-001, dated March 21, 2023

Calibration, Inspection, and Test Records

- Drawing No. C-421760, “Test Assembly,” Revision 1, dated May 3, 2017
- Certificate of Calibration No. 2025000617 for a calibrator, dated March 7, 2025
- Certificate of Calibration No. 2025000619 for a digital multimeter, dated March 26, 2025
- Certificate of Calibration No. 2024004687 for a vibration controller, dated October 31, 2024
- Certificate of Calibration No. 2024004688 for a vibration controller, dated October 31, 2024
- Certificate of Calibration No. 2025001703 for a data acquisition system, dated May 28, 2025
- Certificate of Calibration No. 2024003716 for an accelerometer, dated January 29, 2025
- Certificate of Calibration No. 2025000050 for a micro-ohmmeter, dated January 9, 2025
- Certificate of Calibration No. 2024001810 for an analog input module, dated May 7, 2024
- Certificate of Calibration No. 2025000447 for a temperature and humidity indicator, dated January 31, 2025
- Certificate of Calibration No. 2024001892 for a hygrometer, dated May 9, 2024

- Certificate of Calibration No. 2025000904 for a thermocouple, dated March 7, 2025
- Certificate of Calibration No. 2025001927 for a stopwatch, dated July 21, 2025
- Certificate of Calibration No. 2024002847 for a hygrometer, dated March 20, 2025
- Certificate of Calibration No. 2025000257 for an accelerometer, dated January 29, 2025
- Certificate of Calibration No. 2025000905 for a thermocouple, dated March 7, 2025
- Certificate of Calibration No. 2025002001 for a torque wrench, dated July 21, 2025
- Certificate of Calibration No. 2024005227 for a temperature recorder, dated December 9, 2024
- Certificate of Calibration No. 2024005349 for a torque wrench, dated January 2, 2025
- Certificate of Calibration No. 2024002958 for a chamber, dated July 22, 2024
- Certificate of Calibration No. 2025001573 for a triaxial accelerometer, dated May 19, 2025
- Certificate of Calibration No. 2025001566 for a triaxial accelerometer, dated May 19, 2025
- Certificate of Calibration No. 2025000449 for a digital multimeter, dated February 4, 2025
- Certificate of Calibration No. 2025001261 for a torque wrench, dated April 30, 2025
- Certificate of Calibration No. 2024003383 for a temperature and humidity sensor, dated September 18, 2024
- Certificate of Calibration No. 2024005226 for a temperature controller, dated December 9, 2024
- Certificate of Calibration No. 2024002416 for a temperature controller, dated June 14, 2024
- Certificate of Calibration No. 2024002417 for a temperature controller, dated June 14, 2024
- Certificate of Calibration No. 2025000990 for a digital multimeter, dated May 7, 2025
- Certificate of Calibration No. 2024004687 for a vibration controller, dated October 31, 2024
- Certificate of Calibration No. 2025002006 for a torque wrench, dated July 21, 2025

- Certificate of Calibration No. 2025002013 for a data logger, dated July 21, 2025
- Certificate of Calibration No. 2025000899 for a thermocouple, dated March 7, 2025
- Certificate of Calibration No. 2025000900 for a thermocouple, dated March 7, 2025
- Certificate of Calibration No. 2025000903 for a thermocouple, dated March 7, 2025
- Calibration Certificate Receipt Inspection No. 2025000109 for an antenna, dated April 1, 2025
- Certificate of Calibration No. 250325-11251-ea3722 for an antenna, dated March 26, 2025
- Certificate of Conformance for purchase order (PO) No. PRPO156273-2, Calibration Certificate No. PRPO156273-2, dated March 26, 2025
- Calibration Certificate Receipt Inspection No. 2024005194 for a flow meter, dated February 13, 2025
- Certificate of Calibration No. 435063.273.2025 for a flow meter, dated February 5, 2025
- Calibration Certificate Receipt Inspection No. 2024002398 for a flow meter, dated March 11, 2025
- Certificate of Calibration No. 420667.2025 for a flow meter, dated February 26, 2025
- Calibration Certificate Receipt Inspection No. 2025000056 for a mass flowmeter, dated March 11, 2025
- Certificate of Calibration No. 428171.2025 for a mass flowmeter, dated February 21, 2025
- Calibration Certificate Receipt Inspection No. 2025001625 for a load cell, dated August 6, 2025
- Certificate of Calibration for a load cell for PO No. PRPO158078-2, dated July 9, 2025
- Calibration Certificate Receipt Inspection No. 2024000751 for a spectrum analyzer, dated January 13, 2025
- Certificate of Calibration No. A5882344 a spectrum analyzer, dated January 2, 2025
- Certificate of Calibration No. 2025000412 for a linear variable-differential transformer, dated February 19, 2025
- Certificate of Calibration No. 2025001563 for a caliper, dated May 14, 2025
- Certificate of Calibration No. 2024001450 for an analog input module, Revision 1, dated April 12, 2024

- Certificate of Calibration No. 2024001646 for a pressure transducer, dated December 13, 2024
- Certificate of Calibration No. 2025001440 for a signal conditioner, dated August 6, 2025
- Certificate of Calibration No. 2025000376 for a digital multimeter, dated January 30, 2025
- Calibration Certificate Receipt Inspection No. 2025000233 for a data acquisition system, dated March 10, 2025
- Certification of Calibration for a data acquisition system for PO No. PRPO155752-4, dated March 5, 2025
- Test Procedure No. 1070, “Testing of Spring-Operated Steam Safety-Relief Valves,” Revision E, dated February 17, 2022
- Test Procedure No. PR188164-TP-25, “Test Procedure for Vibration and Thermal Aging of 12 Squib Valve Initiators,” Revision 1, dated February 26, 2025
- Receipt Inspection Report for Element Job No. PR188164, PO No. 4500927124, dated February 28, 2025

Purchase Orders

- PO No. PRPO158078-2 for calibration services, Revision 0, dated June 17, 2025
- PO No. PRPO154552-1 for calibration services, Revision 0, dated December 17, 2024
- PO No. PRPO155752-4 for calibration services, Revision 0, dated April 11, 2025
- PO No. PRPO155664-1 for calibration services, Revision 0, dated February 13, 2025
- PO No. PRPO152093-5 for commercial software, Revision 0, dated August 21, 2024
- PO No. 02480799 from Florid Power & Light for six spring-operated safety relief valves, Revision 0, dated April 7, 2025
- PO No. PRPO156273-2 for calibration services, Revision 0, dated April 2, 2025
- PO No. PRPO154961-2 for calibration services, Revision 0, dated January 13, 2025
- PO No. PRPO158254-2 for a Yokogawa DX1006N-3-4-2/A2/C3/F1/M1/S2 recorder, Revision 0, dated June 27, 2025
- PO No. C1014472 from American Electric Power for duct fabric, 12 in x 150 ft, ventglass flexible fabric material, Revision 0, dated January 28, 2025
- PO No. C1015783 from American Electric Power for duct fabric, 12 in x 150 ft, ventglass flexible fabric material, Revision 0, dated May 7, 2025

- PO No. PRPO156356-4 for testing services, dated March 24, 2025
- PO No. 01491339 from Constellation Energy for six solenoid valves, 3-way direct acting, normally open, air service, 125 VDC, Revision 1, dated January 23, 2025
- PO No. 02479120 from NextEra Energy for five-time delay relays, Series 812, 120VAC/125VDC, 10 AMPS, Revision 0, dated February 19, 2025
- PO No. 45698213 from Energy Harbor for three 6 in. Yokogawa DX1006N recorders, Revision 0, dated December 17, 2024
- PO No. PRPO 159381-3, dated August 15, 2025
- PO No. PRPO 146932-5, dated October 3, 2023
- PO No. PRPO 159371-1, dated August 14, 2025
- PO No. PRPO 155777-4, dated April 9, 2025
- PO No. PRPO159136-3, dated August 14, 2025
- PO No. PRPO 159123-4, dated August 5, 2025

Internal Audits

- 2024 Internal Audit Plan, Audit Number IA-25-001, audit dates January 20-23, 2025
- 2024 Internal Audit Report, Audit Number IA-25-001, audit dates January 20-23, 2025
- 2023 Internal Audit Report, Audit Number IA-23-002, audit dates October 9-12, 2023
- 2022 National Technical Systems Audit Plan NTS/HSV-1A-23-01, audit dates January 24-27, 2023
- 2022 National Technical Systems Audit Report No. NTS/HSV-1A-23-01, audit dates January 24-27, 2023

External Audit, Survey Reports and Annual Evaluations

- F-1257B Supplier Annual Evaluation, dated November 18, 2024
- NTS Audit Plan NTS/HSV-SA-003, audit date March 9-10, 2023
- Nuclear Industry Assessment Corporation (NIAC) Audit Checklist for Audit Number SA-23-003, dated May 8, 2023
- NTSH-1257B, Annual Vendor Evaluation, dated February 13, 2023

- NIAC Audit Report Package, NIAC Audit No. 26031, dated January 11, 2022
- NIAC Audit Report Package, NIAC Audit No. 31514, dated October 4, 2024
- F-1257B Annual Evaluation, dated July 10, 2025
- Annual Vendor Evaluation, dated May 9, 2022
- Annual Vendor Evaluation, dated May 10, 2023
- F-1257B, Annual Vendor Evaluation, dated October 28, 2024
- NIAC Audit Report dated February 24, 2023
- Annual Vendor Evaluation, dated October 30, 2023
- Annual Vendor Evaluation, dated November 18, 2024
- Annual Vendor Evaluation, dated March 26, 2025
- NIAC Audit Checklist, Audit No. 28037, dated March 23, 2023

Notices of Deviations (NODs)

- 25-025, dated January 30, 2025
- 25-029, dated January 30, 2025
- 25-030, dated February 3, 2025
- 25-041, dated February 4, 2025
- 25-047, dated February 14, 2025
- 25-055, dated January 23, 2025
- 25-079, dated March 13, 2025
- 25-083, dated December 13, 2024
- 25-101, dated July 3, 2024
- 25-102, dated March 28, 2025
- 25-117, dated May 12, 2025

Non-Conforming Material Reports

- 24-003A, dated October 21, 2024
- 24-005, dated November 14, 2024
- 25-001, dated February 4, 2025
- 25-002, dated February 4, 2025
- 25-005, dated July 18, 2025

Corrective Preventative Action Request (CPAR) Reports

- 22-012, dated issued June 9, 2023

- 23-001, dated January 18, 2023
- 23-002, dated January 18, 2023
- 23-003, dated January 27, 2023
- 23-004, dated January 27, 2023
- 23-005, dated January 30, 2023
- 23-006, dated January 30, 2023
- 23-007, dated February 9, 2023
- 23-008, dated January 27, 2023
- 23-010, dated April 5, 2023
- 23-011, dated April 24, 2023
- 23-012, dated May 2, 2023
- 23-013, dated May 10, 2023
- 23-014, dated May 25, 2023
- 23-015, dated June 20, 2023
- 23-016, dated July 19, 2023
- 23-017, dated July 20, 2023
- 23-018, dated July 20, 2023
- 23-019, dated July 20, 2023
- 23-020, dated July 20, 2023
- 23-021, dated July 20, 2023
- 23-022, dated July 20, 2023
- 23-023, dated November 15, 2023
- 23-024, dated November 15, 2023
- 23-025, dated November 15, 2023
- 23-026, dated November 15, 2023
- 24-014, dated March 11, 2024
- 24-015, dated March 26, 2024
- 24-017, dated April 5, 2024
- 24-018, dated April 5, 2024
- 24-019, dated April 9, 2024
- 24-025, dated June 13, 2024
- 24-038, dated November 18, 2024
- 24-039, dated November 20, 2024
- 24-040, dated December 4, 2024
- 25-006, dated January 5, 2025
- 25-007, dated January 5, 2025

<u>CPAR Reports Opened During the NRC Inspection</u>

- CPAR 25-025, dated August 19, 2025
- CPAR 25-026, dated August 21, 2025
- CPAR 25-027, dated August 19, 2025
- CPAR 25-028, dated August 20, 2025
- CPAR 25-029, dated August 20, 2025
- CPAR 25-030, dated August 20, 2025
- CPAR 25-031, dated August 20, 2025
- CPAR 25-032, dated August 21, 2025
- CPAR 25-033, dated August 20, 2025

- CPAR 25-034, dated August 20, 2025
- CPAR 25-035, dated August 20, 2025
- CPAR 25-036, dated August 20, 2025

Training and Qualification Records

- Fred Jefferson, Lead auditor
- John M. Salasky, Lead auditor
- Ron Kelly, Lead auditor
- Justin Freeman, Calibration Technician
- Donald O. Malone - Third Party Qualification Technician Level 2
- Lee Wheeler - Senior Testing Technician
- Steve Nelson - Principal Testing Technician
- Chad Herrin - Principal Testing Technician
- Doug Duvall - Technician Level 2