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

October 26, 2026

Mr. Nick Sebring
Nuclear Quality Supervisor
2048 Industrial Blvd
Kimball, TN 37347

SUBJECT: NUCLEAR REGULATORY COMMISSION INSPECTION REPORT OF HENRY PRATT COMPANY, LLC, NO. 99902116/2026-201, AND NOTICE OF NONCONFORMANCE

Dear Mr. Sebring:

On September 14-18, 2026, the U.S. Nuclear Regulatory Commission (NRC) staff conducted an inspection at the Henry Pratt Company, LLC's (hereafter referred to as HPCO) facility in Kimball, TN. The purpose of this limited-scope routine inspection was to assess HPCO'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 inspection specifically evaluated HPCO's implementation of quality activities associated with the design, fabrication, testing, and commercial-grade dedication of safety-related valves, valve parts, and appurtenances for U.S. nuclear power plants. In addition, the NRC inspection team evaluated HPCO's closure of the corrective actions for the inspection findings documented in inspection report No. 99902116/2023-201, dated December 5, 2023 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML23324A425). The enclosed report presents the results of the inspection. This NRC inspection report does not constitute NRC's endorsement of HPCO'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 generally met NRC requirements imposed on you by your customers or NRC licensees with two exceptions. Specifically, the NRC inspection team determined that HPCO was not fully implementing its QA program in the areas of commercial-grade dedication and control of measuring and test equipment. The specific findings and references to the pertinent requirements are identified in the enclosures to this letter. In response to the enclosed Notice of Nonconformance (NON), HPCO should document the results of the extent of condition review for these findings and determine if there are any effects on other safety-related components.

Please provide a written statement or explanation within 30 days of 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 (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, please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request that such material be withheld from public disclosure, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim (e.g., explain why the disclosure of information would create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information).

If 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.”

If you have any questions concerning this matter, please contact Yamir Diaz-Castillo of my staff at (301) 415-2228.

Sincerely,

Douglas Bollock Signed by Douglas Bollock on 10/26/26

Douglas R. Bollock, Chief
Vendor and Quality Assurance Branch
Division of Reactor Inspection Support
Office of the Chief Nuclear Reactor Inspector

Docket No.: 99902116

EPID No.: I-2026-001-0119

Enclosures:
1. Notice of Nonconformance
2. Inspection Report No. 99902116/2026-201 and Attachment

SUBJECT: NUCLEAR REGULATORY COMMISSION INSPECTION REPORT OF HENRY PRATT COMPANY, LLC, NO. 99902116/2026-201, AND NOTICE OF NONCONFORMANCE

DATE: October 26, 2026

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ADAMS Accession Numbers:
PKG: **ML26286A309**
Letter: **ML26286A320**
e-Concurrence case: **20261013-02873**

NOTICE OF NONCONFORMANCE

Henry Pratt Company, LLC
2048 Industrial Blvd
Kimball, TN 37347

Docket No. 99902116
Report No. 2026-201

Based on the results of a U.S. Nuclear Regulatory Commission (NRC) inspection conducted at the Henry Pratt Company, LLC's (hereafter referred to as HPCO) facility in Kimball, TN, from September 14, 2026, through September 18, 2026, HPCO did not conduct certain activities in accordance with NRC requirements that were contractually imposed on HPCO by its customers or NRC licensees:

A. Criterion VII, "Control of Purchased Material, Equipment, and Services," 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," in part, "Measures shall be established to assure that purchased material, equipment, and services, whether purchased directly or through contractors and subcontractors, conform to the procurement documents. These measures shall include provisions, as appropriate, for source evaluation and selection, objective evidence of quality furnished by the contractor or subcontractor, inspection at the contractor or subcontractor source, and examination of products upon delivery."

   Subsection 4.11.3 of HPCO's NQAM states that "Once the service is complete, the NPI shall verify the testing was compliant with the ISO/IEC 17025:2017 scope and the HPCO Purchase Order."

   Contrary to the above, as of September 18, 2026, HPCO failed to assure that purchased services conform to the procurement documents. Specifically, the NRC inspection team determined that the test method used by HPCO's supplier to test fresh water for total dissolved solids was not included within the supplier's scope of accreditation under the International Organization for Standardization/International Electrotechnical Commission (ISO/IEC) standard No. 17025:2017, "General Requirements for the Competence of Testing and Calibration Laboratories." The fresh water is used for the hydro test and cleaning of safety-related valves.

   This issue has been identified as Nonconformance 99902116/2026-201-01.

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

   Subsection 12.3.6 of HPCO's NQAM states, in part, that "When M&TE is found to be out-of-calibration, it shall be evaluated for the 'as found' condition. The [Nuclear Quality Manager]/[Nuclear Product Inspector] shall evaluate the nonconformance, provide recommendations for disposition of the condition, and initiate corrective action, as necessary. The [Nuclear Quality Manager] shall initiate a review of the records to determine what inspections or tests have been performed using the out of tolerance item since its last valid calibration. The

affected items shall be listed on an NMR, which is handled in accordance with Section 15.0."

Contrary to the above, as of September 18, 2026, HPCO failed to assure that measuring and testing devices used in activities affecting quality were properly controlled. Specifically, HPCO identified that a torque wrench and an infrared thermometer were found to be out of tolerance during their calibration on January 20, 2025, and February 5, 2025, respectively. While HPCO initiated nonconforming material reports (NMRs) Nos. 25002118 and 25002120, both of these NMRs were still open and no investigation had been performed.

This issue has been identified as Nonconformance 99902116/2026-201-02.

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, Vendor and Quality Assurance Branch, Division of Reactor Inspection Support, Office of the Chief Nuclear Reactor Inspector, within 30 days of the date of the letter transmitting this Notice of Nonconformance. In addition, please submit an electronic copy of your response to Douglas.Bollock@nrc.gov and to Yamir.Diaz-Castillo@nrc.gov. 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 bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information). If 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 26th day of October 2026.

U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF THE CHIEF NUCLEAR REACTOR INSPECTOR
DIVISION OF REACTOR INSPECTION SUPPORT
VENDOR INSPECTION REPORT

Docket No.:	99902116
Report No.:	99902116/2026-201
Vendor:	Henry Pratt Company, LLC 2048 Industrial Blvd Kimball, TN 37347
Vendor Contact:	Mr. Nick Sebring Nuclear Quality Supervisor Email: NSebring@muellerwp.com Phone: (931) 409-6686
Nuclear Industry Activity:	Henry Pratt Company, LLC's scope of supply includes safety-related American Society of Mechanical Engineers Boiler and Pressure Vessel Code and Non-Code Class 2 and Class 3 valves, valve parts, and appurtenances.
Inspection Dates:	September 14-18, 2026

Inspectors:			
	Yamir Diaz-Castillo	CNRI/DRIS/VQAB	Team Leader
	Liam O'Donoghue	CNRI/DRIS/VQAB	Team Lead (Training)
	Andrea Keim	CNRI/DRIS/VQAB	
	Tiffany Lee	CNRI/DRIS/VQAB	Trainee

Approved by:	Douglas R. Bollock, Chief Vendor and Quality Assurance Branch Division of Reactor Inspection Support Office of the Chief Nuclear Reactor Inspector

EXECUTIVE SUMMARY

Henry Pratt Company, LLC
99902116/2026-201

The U.S. Nuclear Regulatory Commission (NRC) staff conducted an inspection at the Henry Pratt Company, LLC's (hereafter referred to as HPCO) facility in Kimball, TN. The purpose of this limited-scope routine inspection was to assess HPCO's compliance with the provisions of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 21, "Reporting of Defects and Noncompliance," 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," the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code Section III, "Rules for Construction of Nuclear Facility Components," Section V, "Nondestructive Examination", and Section IX, "Welding, Brazing, and Fusing Qualifications," and the American Society for Nondestructive Testing (ASNT) Recommended Practice No. SNT-TC-1A, "Personnel Qualification and Certification in Nondestructive Testing." The NRC inspection team conducted this inspection on-site the week of September 14-18, 2026. This was the second NRC inspection at this facility. The last NRC inspection of this facility was performed in October 2023.

This inspection specifically evaluated HPCO's implementation of the quality activities associated with the design, fabrication, testing, and commercial-grade dedication of safety-related valves, valve parts, and appurtenances for U.S. nuclear power plants. In addition, the NRC inspection team evaluated HPCO's closure of the corrective actions for the inspection findings documented in inspection report (IR) No. 99902116/2023-201, dated December 5, 2023 (Agencywide Documents Access and Management System Accession No. ML23324A425).

Specific activities observed by the NRC inspection team included:

- Commercial-grade dedication activities for three O-rings and three valve packings.

These regulations served as the bases for the NRC inspection:

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

During this inspection, the NRC inspection team implemented Inspection Procedure (IP) 43002, "Routine Inspections of Nuclear Vendors," dated February 10, 2023; IP 43004, "Inspection of Commercial-Grade Dedication Programs," dated February 10, 2023; 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 nonconformances described below, the NRC inspection team concluded that HPCO'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 HPCO's personnel are implementing these policies and procedures effectively. The results of this inspection are summarized below.

Nonconforming Material, Parts, or Components and Corrective Actions

The NRC inspection team reviewed HPCO's closure of the corrective actions associated with Nonconformance 99902116/2023-201-01 and Unresolved Item (URI) 99902116/2023-201-02, as documented in the NRC's IR No. 99902116/2023-201. The NRC inspection team determined that HPCO's corrective actions taken to address Nonconformance 99902116/2023-201-01 were implemented. The NRC inspection team also reviewed the information HPCO provided to address URI 99902116/2023-201-02. Based on its review, the NRC inspection team closed Nonconformance 99902116/2023-201-01 and URI 99902116/2023-201-02.

Commercial-Grade Dedication

The NRC inspection team issued Nonconformance 99902116/2026-201-01 in association with HPCO's failure to implement the regulatory requirements of Criterion VII, "Control of Purchased Materials, Equipment, and Services," of Appendix B to 10 CFR Part 50. Nonconformance 99902116/2026-201-01 cites HPCO for failing to establish measures to assure that purchased services conform to the procurement documents. Specifically, the NRC inspection team determined that the test method used by HPCO's supplier to test fresh water for total dissolved solids was not included within the supplier's scope of accreditation under the International Organization for Standardization/International Electrotechnical Commission (ISO/IEC) standard No. 17025:2017, "General Requirements for the Competence of Testing and Calibration Laboratories."

Control of Measuring and Test Equipment

The NRC inspection team issued Nonconformance 99902116/2026-201-02 in association with HPCO's failure to implement the regulatory requirements of Criterion XII, "Control of Measuring and Testing Equipment," of Appendix B to 10 CFR Part 50. Nonconformance 99902116/2026-201-02 cites HPCO for failing to assure that measuring and testing devices used in activities affective quality were properly controlled. Specifically, HPCO did not perform an investigation to determine the impact on previously completed work of the out-of-tolerance condition for a torque wrench and an infrared thermometer.

Other Inspection Areas

The NRC inspection team determined that HPCO established its programs for design control, procurement document control, control of special processes, test control, material traceability, 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 HPCO is implementing its policies and procedures associated with these programs. In addition, the NRC inspection team determined that HPCO 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. Commercial-Grade Dedication

   a. Inspection Scope

   The U.S. Nuclear Regulatory Commission (NRC) inspection team reviewed Henry Pratt Company, LLC.'s (hereafter referred to as HPCO) policies and implementing procedures that govern the implementation of its commercial-grade dedication (CGD) program to verify compliance with the regulatory requirements of Criterion III, "Design Control," and Criterion VII, "Control of Purchased Material, Equipment, and Services," of Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, "Domestic Licensing of Production and Utilization Facilities."

   The NRC inspection team reviewed a sample of completed CGD packages for the following items: adapter plate, bronze bearing, O-ring, and thrust collar. The NRC inspection team evaluated the criteria for the identification of the safety functions, selection of critical characteristics and acceptance criteria, selection of verification methods, and the justification provided for the chosen sampling plan, as applicable, to verify effective implementation of HPCO's CGD process. The NRC inspection team confirmed that HPCO's CGD process provides reasonable assurance that the items and services being dedicated will perform their intended safety function.

   The NRC inspection team also observed the CGD of an O-ring and a valve packing. During these observations, the NRC inspection team verified that HPCO's Nuclear Product Inspectors (NPIs) followed the CGD plans and appropriately documented the inspection results. The NRC inspection team further confirmed the NPIs used calibrated measuring and testing equipment (M&TE) to obtain the required measurements. In addition, the NRC inspection team reviewed the NPI's training and qualification records and confirmed they had completed all the required training and had maintained the applicable qualification and certification in accordance with HPCO's policies and procedures.

   The NRC inspection team reviewed HPCO's use of the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Arrangement (MRA) accreditation process in lieu of performing a commercial-grade survey for procuring calibration and testing services as part of the CGD process. HPCO implements this process in accordance with 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, as recognized by the NRC in a safety evaluation (SE) dated November 23, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20322A019).

   The NRC inspection team also discussed the CGD program with HPCO'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

HPCO's procedure A&T-6, "Test and Acceptance of Valves for Nuclear Projects," Revision F, dated February 9, 2024, establishes quality requirements for water used in the hydrostatic testing and cleaning of American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code valves. These requirements are derived from Table 304.1, "Water Requirements," in Subpart 2.1, "Quality Assurance Requirements for Cleaning of Fluid Systems and Associated Components for Nuclear Facilities," of NQA-1-2015, "Quality Assurance Requirements for Nuclear Facility Applications."

For water quality testing, HPCO utilizes Applied Technical Services (ATS), a laboratory listed on its AVL. ATS tests the water for pH, chlorides, fluorides, sulfates, and total dissolved solids (TDS). HPCO relies on the ILAC accreditation process, in accordance with NEI 14-05A and the associated NRC's SE, in lieu of performing a commercial-grade survey for ATS's testing services. As required by NEI 14-05A and the NRC's SE, the specific test methods employed must be within the scope of the laboratory's accreditation to the International Organization for Standardization/International Electrotechnical Commission (ISO/IEC) standard No. 17025:2017, "General Requirements for the Competence of Testing and Calibration Laboratories."

During a review of the ATS test reports issued since January 2024, the NRC inspection team questioned whether the test method used by ATS for measuring TDS was included within ATS's scope of accreditation. TDS is defined as the combined total of organic and inorganic substances dissolved in water. Following discussions with ATS, HPCO confirmed that ATS was not accredited for the specific test method used to measure TDS.

The NRC inspection team identified this issue as Nonconformance 99902116/2026-201-01 for HPCO's failure to assure that purchased services conform to the procurement documents. HPCO initiated Root Cause Counter Measure (RCCM) No. 2026-017 to address this nonconformance.

In addition, during the review of procedure No. QAP-15, "Collection, Storage and Maintenance of Quality Assurance Records," Revision C, dated February 26, 2026, the NRC inspection team observed that the procedure classifies audits and survey reports as non-permanent records, specifying a retention period of three years after completion. However, the NRC's regulatory position is that commercial-grade survey reports must be maintained as lifetime records. These reports provide objective evidence that a dedicated item and/or service meets the requirements for use as a basic component. Maintaining these records for the lifetime of the item or service is necessary to ensure traceability and compliance with NRC's quality assurance requirements. The NRC inspection team determined this issue to be minor as HPCO does not currently perform commercial-grade surveys. HPCO initiated RCCM 2026-021 to address this issue.

c. Conclusion

The NRC inspection team issued Nonconformance 99902116/2026-201-01 in association with HPCO's failure to implement the regulatory requirements of Criterion VII of Appendix B to 10 CFR Part 50. Nonconformance 99902116/2026-201-01 cites HPCO for failing to assure that purchased services conform to the procurement documents.

Specifically, the NRC inspection team determined that the test method used by HPCO's supplier to test fresh water for total dissolved solids was not included within the supplier's scope of accreditation under the ISO/IEC standard No. 17025:2017.

2. Control of Measuring and Test Equipment

a. Inspection Scope

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

The NRC inspection team performed a walkthrough of HPCO's nuclear cage to verify the proper control of M&TE. For a selected sample of M&TE, the NRC inspection team verified that the M&TE had the appropriate identification traceable to the calibration records. The NRC inspection team also verified that the sampled M&TE had been calibrated, adjusted, and maintained at prescribed intervals prior to use, in accordance with HPCO's procedures. 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 also discussed the control of M&TE program with HPCO'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

Subsection 12.3.6 of HPCO's Nuclear Quality Assurance Manual (NQAM) requires HPCO to evaluate the "as found" conditions when M&TE is found to be out-of-calibration. This process includes evaluating the nonconformance, providing recommendations for dispositioning the condition, and initiating corrective action as necessary. The process also requires a review of records to determine which inspections or tests were performed using the out-of-tolerance M&TE since its last valid calibration, and listing the affected items on a nonconforming material report (NMR).

The NRC inspection team observed that HPCO had initiated two NMRs to address a torque wrench and an infrared thermometer that were found to be out-of-tolerance during their calibrations on January 20, 2025, and February 5, 2025, respectively. However, the NRC inspection team noted that both NMRs remained open at the time of the inspection. Furthermore, during discussions with HPCO's staff, the NRC inspection team determined that HPCO had not performed an investigation into the potential impact of the out-of-tolerance M&TE on previously completed work.

The NRC inspection team identified this issue as Nonconformance 99902116/2026-201-02 for HPCO's failure to perform an investigation to determine the impact on previous inspections and tests for two gauges found to be out-of-calibration. HPCO initiated RCCM No. 2026-023 to address this nonconformance.

In addition, during the walkthrough of the nuclear cage, the NRC inspection team requested to review the current calibration certificate for a 30 psi pressure gauge. HPCO staff informed the NRC inspection team that they could not find the current calibration certificate. However, HPCO staff were able to provide the two most recent prior calibration certificates, demonstrating that the pressure gauge had been previously calibrated. In addition, HPCO provided documentation confirming that the pressure gauge had not been used since its last valid calibration. The NRC inspection team determined this issue to be minor because the pressure gauge had not been used since its last valid calibration, and there was documented evidence of it being calibrated prior to its last use. HPCO initiated NMR No. 2600-3105 to address this issue.

c. Conclusion

The NRC inspection team issued Nonconformance 99902116/2026-201-02 in association with HPCO's failure to implement the regulatory requirements of Criterion XII and Appendix B to 10 CFR Part 50. Nonconformance 99902116/2026-201-02 cites HPCO for failing to assure that measuring and testing devices used in activities affective quality were properly controlled. Specifically, HPCO did not perform an investigation to determine the impact of the out-of-tolerance condition for a torque wrench and an infrared thermometer on previously completed work.

3. Design Control

a. Inspection Scope

The NRC inspection team reviewed HPCO's policies and implementing procedures that govern the implementation of its design control program to verify compliance with the regulatory requirements of Criterion III of Appendix B to 10 CFR Part 50, and with the applicable requirements of Subsection NCA, "General Requirements for Division 1 and Division 2," and 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 noted that most nuclear work conducted at HPCO is for replacement valves, parts, and appurtenances. The NRC inspection team reviewed a sample of completed ASME B&PV Code data packages for a replacement body and disk and an 8-inch butterfly valve. The NRC inspection team confirmed that the design requirements specified in the customers' POs were adequately translated into the applicable HPCO drawings and design specifications. The NRC inspection team also confirmed that the design documentation included the applicable technical and regulatory requirements as required by customer specifications, HPCO's procedures, and applicable ASME B&PV Code requirements. The NRC inspection team also verified that the materials of construction and components for the replacement body and disk and the 8-inch butterfly valve conformed to appropriate material specifications, design specifications, and ASME B&PV Code requirements.

The NRC inspection team also discussed the engineering change process with HPCO's Senior Nuclear Engineer. HPCO utilizes the Engineering Change Notice (ECN) process for multiple types of document changes such as: (1) detail drawing changes (i.e. machine marks, tolerance changes); (2) bill of materials revisions; (3) part number changes; (4) correcting document or drawing errors; and (5) editorial revisions to

Nuclear Design reports and General Arrangement and Cross-sectional drawings. The ECN process begins with the initiation of an Engineering Change Request (ECR) where details of the requested design change to drawing(s) are specified, and whether the design change impacts the Design Report. When a design change impacts the Design Report, the Certifying Engineer is part of the approval process of the ECR.

The NRC inspection team noted that there were no ECRs and ECNs that impacted the Design Reports for nuclear components manufactured at HPCO since the last inspection. The NRC inspection team reviewed a sample of ECRs and ECNs for detail drawing changes, drawing designation changes, revisions to TIR and concentricity callouts, and addition of contractual surface finish requirements. The NRC inspection team verified that HPCO is implementing its design change process in accordance with HPCO procedures and is subject to design control measures commensurate with those applied to the original design. The NRC inspection team verified that individuals or groups that are performing verification of the design change process are not the same as those who performed the original design, but who may be from the same organization.

The NRC inspection team verified that HPCO'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) engineering changes were accomplished in accordance with HPCO's procedures.

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

4. Procurement Document Control and Supplier Oversight

a. Inspection Scope

The NRC inspection team reviewed HPCO's policies and implementing procedures that govern the implementation of its procurement document control and supplier oversight programs to verify compliance with the regulatory 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 purchased orders (POs), HPCO's Approved Vendors List (AVL), supplier audit reports, receiving inspection checklists/records, certificates of compliance, and annual evaluations.

The NRC inspection team reviewed a sample of POs to verify that: (1) quality requirements, including technical, administrative, regulatory, and reporting requirements, are specified and are extended to lower tier suppliers where necessary; (2) HPCO's right of access is required to the suppliers' facilities; and (3) changes to the POs are subject to the same degree of control as used in the preparation of the original documents.

The NRC inspection team also reviewed a sample of audit reports and verified that the audits reports included, as applicable: (1) an audit plan; (2) any findings identified and the associated corrective actions; (3) adequate documented objective evidence of compliance with the applicable requirements; and (4) a documented review by HPCO's responsible management. For the review of the annual evaluations, the NRC inspection team confirmed they included the information required by HPCO'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 lead auditors and auditors and confirmed that auditing personnel had completed all the required training and had maintained the applicable qualification and certification in accordance with HPCO's policies and procedures.

In addition, the NRC inspection team reviewed HPCO's process for qualifying Material Organizations (MO) in accordance with the requirements of Subsection NCA-3315.2, "Evaluation of the Qualified Material Organization's Program by Certified Material Organizations or Certificate Holders," in Section III of the ASME B&PV Code. HPCO only has one MO they qualify in accordance with the requirements of NCA-3315.2. The NRC inspection team verified that: (1) HPCO adequately qualified the MO; and (2) the requirements of Appendix B to 10 CFR Part 50, and 10 CFR Part 21 were invoked in the POs.

The NRC inspection team also discussed the procurement document control and supplier oversight programs with HPCO'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 a review of a sample of POs, the NRC inspection team noted several inconsistencies in how HPCO invoked quality, regulatory, and accreditation requirements in the POs. These inconsistences include POs containing requirements that were not applicable to the item or service being procured, POs not aligning with the method used to qualify or control the supplier, and POs failing to invoke requirements specified by the HPCO NQAM.

Specifically, the NRC inspection team identified that several POs for calibration services invoked both the requirements of Appendix B to 10 CFR Part 50, and 10 CFR Part 21, as well as the requirements specified by Revision 1 of NEI 14-05A, as recognized by the NRC in the SE dated November 23, 2020. These two sets of requirements cannot be invoked together, as Appendix B to 10 CFR Part 50 and 10 CFR Part 21 would apply to safety-related POs while the requirements from Revision 1 of NEI 14-05A would apply to commercial POs. During discussions with HPCO staff, the NRC inspection team learned that HPCO was taking an overly conservative approach in applying both sets of requirements despite only one set being required depending on the type of procurement

(e.g., safety-related vs. commercial). The NRC inspection team determined this issue to be minor because there was no impact to the calibration services provided.

In addition, Section 4.8.2.3 of HPCO's NQAM states, in part, that POs shall contain: "Documentation requirements including a statement that the supplier follows the quality program accepted by the Nuclear Quality Manager." The NRC inspection team identified that several POs issued to one supplier did not include a statement that the supplier must follow their HPCO approved quality program. The NRC inspection team determined this issue to be minor because HPCO did invoke the requirements of Appendix B to 10 CFR Part 50, and there was no impact to the services or equipment provided.

Finally, the NRC inspection team identified that one safety-related PO failed to invoke the requirements of Appendix B to 10 CFR Part 50. The NRC inspection team determined this issue to be minor because HPCO invoked the work be done under the supplier's QA program reviewed and approved by HPCO, which HPCO concluded met the requirements of Appendix B to 10 CFR Part 50, and there was no impact to the items provided.

HPCO initiated RCCM 2026-019 to address these issues.

c. Conclusion

With the exception of the minor issues identified above and the nonconformance described in Section 1.b, the NRC inspection team concluded that HPCO 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 HPCO 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 HPCO'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 HPCO's nuclear cage, where receipt, in-process, and final inspections of nuclear safety-related materials are conducted and stored. The nuclear cage also maintains the storage of nuclear stock and nonconforming materials. The NRC inspection team noted that access to the nuclear cage is strictly restricted to the Nuclear Quality Manager and the NPIs.

The NRC inspection team observed that the materials within the nuclear cage identified the heats for the material and that all materials were marked with unique identifiers traceable to procurement records and Certified Material Test Reports. When the unique identifier for a component must be removed during a machining process, the identifier is

applied to another area. A Nuclear Method Sheet additionally serves as a backup for material identification if any permanent markings are lost during work conducted on a nuclear component. For a sample of material selected within the nuclear cage, the NRC inspection team observed that identification markings were: (1) traceable to design and shop drawings; (2) remained legible through the manufacturing process; and (3) were applied using materials and methods that provided a clear and legible identification and did not adversely affect the function or service life of structure systems or components observed.

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

6. Control of Special Processes

a. Inspection Scope

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

Welding

There were no safety-related welding activities conducted during the week of the inspection. The NRC inspection reviewed a sample of completed welding records for the fabrication and welding of a disc edge groove weld and for welding a disc edge to a disc. The NRC inspection team also reviewed the associated Weld Procedure Specifications (WPS) and Procedure Qualification Records (PQR), as well as HPCO's existing WPS and PQRs for welding nuclear safety-related components. The NRC inspection team confirmed that the welding records and WPS and PQRs, as well as the existing WPS and PQRs for welding nuclear safety-related components, contained the required information in accordance with HPCO's applicable welding procedures and requirements

of Section IX of the ASME B&PV Code. The NRC inspection team also verified that welding activities were conducted by qualified welders.

The NRC inspection team noted that the nuclear weld storage area is in HPCO's nuclear cage, and that issuance of welding material is done by either the NPI or the weld engineer. The NRC inspection team verified that the process for issuing weld filler metal was controlled in accordance with HPCO's applicable welding procedure. 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 records and continuity records for the two welders at HPCO. The NRC inspection team confirmed that the welders had completed the required training and qualifications and have maintained their qualifications in accordance with HPCO'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 conducted during the week of the inspection. The NRC inspection team reviewed a sample of completed NDE records associated with liquid penetrant testing (PT) and visual examination (VT) for a replacement body and disk, and the VT, radiographic testing (RT), and ultrasonic testing (UT) for an 8-inch butterfly valve. The NRC inspection team confirmed that the NDE reports contained the required information in accordance with HPCO's NDE procedures and the applicable requirements of Section V of the ASME B&PV Code. The NRC inspection team noted that NDE for RT and UT are subcontracted to qualified NDE suppliers. The NRC inspection team verified that NDE activities were performed by qualified NDE personnel, and that NDE suppliers conducting examinations were qualified in accordance with HPCO's NDE procedures and were on HPCO's AVL.

The NRC inspection team reviewed HPCO's training and qualification records for HPCO's NDE personnel and confirmed that the NDE personnel had completed required training and have maintained their qualifications in accordance with HPCO'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 HPCO'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 HPCO is implementing its control of special processes program in accordance with the regulatory requirements of Criterion IX of Appendix B to 10 CFR Part 50. Based on the limited sample of documents reviewed, the NRC inspection team also determined that HPCO is implementing its policies and

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

7. Test Control

a. Inspection Scope

The NRC inspection team reviewed HPCO's policies and implementing procedures that govern the implementation of its test control program to verify compliance with the regulatory 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. The NRC inspection team reviewed a sample of completed valve hydrostatic test reports and confirmed that all the test requirements were met. The NRC inspection team verified that the tests were performed using properly calibrated M&TE. The NRC inspection team also confirmed that the test reports adequately documented the following information: (1) test parameters; (2) test results; (3) M&TE used; (4) applicable test procedure revision and date; and (5) verification of the test results. In addition, the NRC inspection team reviewed the training and qualification records for the Certified Testers and confirmed that testing personnel were trained and qualified in accordance with HPCO's policies and procedures.

The NRC inspection team also discussed the test control program with HPCO'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

HPCO's completed hydrostatic test reports are documented in the "Assembly and Test Record" form (NQA-35). The NRC inspection team observed that the test reports did not identify the name of the Certified Tester that conducted the hydrostatic testing. HPCO initiated RCCM No. 2026-021 to address this issue.

c. Conclusion

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

8. Nonconforming Material, Parts, or Components and Corrective Actions

a. Inspection Scope

The NRC inspection team reviewed HPCO's policies and implementing procedures that govern the implementation of its nonconforming materials, parts, or components and corrective action programs to verify compliance with the regulatory requirements of Criterion XV, "Nonconforming Materials, Parts, or Components," and Criterion XVI, "Corrective Action," of Appendix B to 10 CFR Part 50.

The NRC inspection team reviewed a sample of NMRs to verify that HPCO: (1) dispositioned the NMRs in accordance with the applicable procedures in a timely manner; (2) documented an appropriate technical justification for specific dispositions; (3) took adequate corrective actions regarding the nonconformance item; (4) and took adequate measures to prevent use.

The NRC inspection team reviewed a sample of RCCMs reports to verify: (1) adequate documentation and description of condition adverse to quality; (2) appropriate analysis of the cause of the condition and corrective actions taken to prevent recurrence; (3) appropriate review, approval and distribution of information; (4) documentation of the current status of the corrective actions; and (5) actions taken to verify and effective implementation of the corrective actions.

In addition, the NRC inspection team evaluated HPCO's closure of the corrective actions for the inspection findings documented in inspection report (IR) No. 99902116/2023-201, dated December 5, 2023 (ADAMS Accession No. ML23324A425).

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

b.1 Corrective Actions Associated with Nonconformance 99902116/2023-201-01

Following the October 2023 NRC inspection of HPCO, as documented in IR No. 99902116/2023-201, the NRC issued Nonconformance 99902116/2023-201-01. The nonconformance was issued for HPCO's failure to: (1) assure that applicable regulatory, technical, and quality requirements, were suitably included or referenced in the procurement documents for materials and services; and (2) assess the effectiveness of the control of quality by contractors and subcontractors. Specifically, the NRC inspection team identified that HPCO did not invoke the applicable regulatory, technical, and quality requirements in the procurement documents for the paint used to provide a protective coating on the safety-related valves, and for the procurement of water testing services to ensure the water meets the chemistry requirements used in the hydrostatic testing and cleaning of the safety-related valves. In addition, HPCO did not perform an assessment of the paint supplier and the water testing supplier to verify the adequate implementation of their quality controls associated with the manufacturing of the paint and the supply of water testing services, respectively.

In its response letter dated December 20, 2022 (ADAMS Accession No. ML24024A158), HPCO stated that it would take the following corrective actions to address the water quality testing issue: (1) add a testing service provider to the AVL and issue all future purchases via a nuclear purchase order (PO); (2) create a justification for the water testing frequency and add it to procedure A&T-6, "Test and Acceptance of Valves for Nuclear Projects;" (3) create a Water Quality Log for documenting water quality and a Water Quality Folder to maintain a record of the results; and (4) add nuclear fresh water tank usage to procedure A&T-6.

In addition, HPCO stated that it would take the following corrective actions to address the painting issue: (1) add Carboline to the AVL; (2) procure coatings with a nuclear PO; and (3) add the coating service level to the General Assembly drawings.

The NRC inspection team reviewed the documentation that provided the objective evidence for the completion of the corrective actions. The NRC inspection team confirmed that HPCO: (1) updated the AVL, procedure A&T-6, and the General Assembly drawings; (2) created the water quality log and folder; and (3) started issuing nuclear POs for the water testing and painting suppliers.

The NRC inspection team determined that HPCO's corrective actions were implemented to address Nonconformance 99902116/2023-201-01. Based on its review, the NRC inspection team closed Nonconformance 99902116/2023-201-01.

b.2 Corrective Actions Associated with Unresolved Item 99902116/2023-201-02

During the 2023 NRC inspection, the NRC inspection team noted that QAP-15, "Collection, Storage, and Maintenance of Quality Assurance Records," Revision A, dated 22, 2002, did not include a requirement for retaining 10 CFR Part 21, "Reporting of Defects and Noncompliance," evaluations of all deviations and failures to comply performed in the last five years. HPCO informed the NRC inspection team that operations from Aurora, IL, were relocated to Kimball, TN, in September 2022. Due to the documents being in storage, HPCO was unable to gather the information requested during the 2023 NRC inspection.

In its letter dated December 20, 2023, HPCO stated that based on its investigation, there were no 10 CFR Part 21 evaluations for the last five years at the Aurora facility related to basic components. In addition, the forms NQA-97, "10 CFR Part 21 Evaluation," NQA-52, "10 CFR Part 21 Log," and NQA-06, "NMR Disposition Form," were updated to document 10 CFR Part 21 evaluations, evaluation results, and if the nonconformance was "Reportable" or "Nonreportable." The NRC inspection team verified that these forms were updated and that appropriate controls are still being implemented at the Kimball, TN facility.

The NRC inspection team determined that HPCO's corrective actions were implemented to address URI 99902116/2023-201-02. Based on its review, the NRC inspection team closed URI 99902116/2023-201-02.

b.3 Observations and Findings for 2026 Inspection

The NRC inspection team observed that there were 59 NMRs that remain open without documented dispositions from the appropriate engineering or technical staff. Of these 59 NMRs, 29 were opened in 2024, and the oldest NMR that remains open without any documented disposition is from March 2023. The NRC inspection team selected four of HPCO's older NMRs without dispositions and asked the HPCO staff to locate the nonconforming items and ensure that the items are still adequately segregated and have not been inadvertently used or installed. HPCO staff were able to identify the items selected in the segregated NMR area. HPCO initiated RCCM No. 2026-022 to address this issue.

c. Conclusion

The NRC inspection team concluded that HPCO is implementing its nonconforming material, 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 HPCO is implementing its policies and procedures associated with HPCO's nonconforming material, parts, or components and corrective action programs. No findings of significance were identified in the areas of nonconforming material, parts, or components and corrective actions.

9. Internal Audits

a. Inspection Scope

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

The NRC inspection team verified that HPCO'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 HPCO'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 HPCO adequately initiated and corrected any findings identified during the internal audits.

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

10. 10 CFR Part 21 Program

a. Inspection Scope

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

Furthermore, for the two 10 CFR Part 21 evaluations performed by HPCO since the last NRC inspection, the NRC inspection team verified that HPCO had effectively implemented the requirements for evaluating deviations and failures to comply. The NRC inspection team verified that the procedure provides adequate guidance for providing notifications in accordance with the requirements of 10 CFR 21.21 "Notification of failure to comply of existence of a defect and its evaluation." Neither evaluation required a notification to the NRC.

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

11. Entrance and Exit Meetings

On September 14, the NRC inspection team discussed the scope of the inspection with Graham Hines, HPCO's Vice-President of Engineering, and Dale Speggen, HPCO's Vice-President of Product Management, and other members of HPCO's management and technical staff. On September 18, the NRC inspection team presented the inspection results and observations during an exit meeting with Charlie Clarke, HPCO's Plant Manager, and other members of HPCO'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
Graham Hines	Vice-President (VP) Engineering	Henry Pratt Company (HPCO)	X		
Dale Speggen	VP Product Management	HPCO	X		
Charlie Clarke	Plant Manager	HPCO	X	X	
Nick Sebring	Nuclear Quality Manager	HPCO	X	X	X
Chanel Booker	Senior Nuclear Engineer	HPCO	X	X	X
Beverly Graham	Manager of Nuclear Projects	HPCO	X	X	X
Bobbie Allman	Nuclear Buyer	HPCO	X	X	X
Derek Fraiser	Nuclear Product Inspector	HPCO	X	X	X
Robert Cook	Nuclear Product Inspector	HPCO	X	X	X
Brandon Lowe	Senior Nuclear Product Engineer	HPCO	X	X	X
Kyle Shrum	Nuclear Drafter	HPCO	X	X	X
Alex Malone	Facility Quality Manager	HPCO	X	X	
Kenneth Kilgore	Process Engineer	HPCO	X	X	
Riley Earle	Nuclear Product Engineer	HPCO	X	X	
James Arnold	Industrial Engineer	HPCO	X	X	
Nicholas Velk	Facility Engineering Manager	HPCO	X	X	
Dale Walker	Materials Manager	HPCO	X	X	
Joseph Denman	Manufacturing Manager	HPCO	X	X	

Name	Title	Affiliation	Entrance	Exit	Interviewed
Jamie Johnson	EHS Manager	HPCO	X		
Nicholas Rouhselang	Associate Project Manager	HPCO	X	X	
Joshua Miller	Project Manager	HPCO	X	X	
Douglas Bollock	Branch Chief	Nuclear Regulatory Commission (NRC)		X*	
Yamir Diaz-Castillo	Inspection Team Leader	NRC	X	X	
Liam O'Donoghue	Inspection Team Leader (Training)	NRC	X	X	
Andrea Keim	Inspector	NRC	X	X	
Tiffany Lee	Inspector	NRC	X	X	

* Indicates virtual attendance.

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
99902116/2026-201-01	OPENED	NON	Criterion VII
99902116/2026-201-02	OPENED	NON	Criterion XII
99902116/2023-201-01	CLOSED	NON	Criterion IV and Criterion VII
99902116/2023-201-02	CLOSED	URI	10 CFR Part 21

4. DOCUMENTS REVIEWED

Policies and Procedures

- Henry Pratt Company, LLC Nuclear Quality Assurance Manual, Revision 9, dated February 18, 2026
- A&T-6, “Test and Acceptance of Valves for Nuclear Projects,” Revision F, February 9, 2024
- INSP-1, “Body Wall Thickness Measurement Procedure for Nuclear Valves 3” through 48” (150# Valve Class),” Revision B, dated February 16, 2023
- ENG-005, “Document Control,” Revision 21, dated February 10, 2021
- ENG-013, “Design Report for Nuclear Butterfly Valves & Actuator Assembly,” Revision 6, dated March 29, 2023
- ENG-014, “Procedure for Review & Approval of Detailed Item Documentation,” Revision 14, dated January 14, 2020
- ENG-018, “Windchill Change Process,” Revision 3, dated March 12, 2026
- ENG-WI-36, “Nuclear Order Engineering Procedure,” Revision 13, dated March 4, 2026
- MAN-11, “Cleaning Procedure for Nuclear Valves,” Revision B, dated March 3, 2021
- WP-1, “General Welding and Repair Procedure Specification for Nuclear Valves,” Revision D, dated February 27, 2026
- VT-1, “Visual Examination,” Revision D, dated January 4, 2023
- PT-1, “Liquid Penetrant Examination Visible Dye Solvent Removable,” Revision D, dated January 4, 2023
- QAP-02, “Tool and Gauge Control,” Revision F, dated August 3, 2026
- QAP-03, “Receiving Inspection for Nuclear Projects,” Revision D, dated September 9, 2026
- QAP-04, “Maintenance of Identification and Traceability,” Revision B, dated July 25, 2024
- QAP-05, “In-Process and Finished Part Inspection of Nuclear Projects,” Revision C, dated June 5, 2024
- QAP-06, “Non-destructive Examination – Documentation of Testing and Qualification of Personnel,” Revision E, dated July 26, 2024

- QAP-07, “Preparation and Use of Specification Drawings,” Revision C, dated February 26, 2026
- QAP-10, “Indoctrination and Training Procedure,” Revision G, dated February 26, 2026
- QAP-12, Drafting Control and Documentation for Nuclear Valves,” Revision C, dated February 27, 2026
- QAP-13, “Procurement, Inspection, Handling, Storage and Testing of Motor and Air Operated Valve Actuators,” Revision A, dated September 21, 2023
- QAP-14, “Control of Nuclear Valve Spare Part and Replacement Parts Inquiries and Orders,” Revision F, dated February 26, 2026
- QAP-16, “Reporting of Defects and Non-compliances for Safety Related Basic Components,” Revision D, dated August 2, 2024
- QAP-17, “Qualification of Audit Personnel,” Revision B, dated April 5, 2025
- QAP-18, “Nonconforming Material Procedure,” Revision H, dated February 2, 2026
- QAP-19, “Qualification Procedure for Certifying Engineers (CE),” Revision D, dated March 27, 2023
- QAP-21, “Commercial Grade Dedication,” Revision F, dated September 9, 2026
- QAP-23, “Audit Procedure,” Revision H, dated January 28, 2026
- QAP-24, “Contract Review/Order Entry,” Revision D, dated March 4, 2026
- QAP-25, “Management Review,” Revision A, dated September 27, 2022
- QAP-28, “Nuclear Root Cause Counter Measure,” Revision C, dated July 18, 2026
- KI-000-QP-23-FR01, “Root Cause-Corrective Measure Form,” Revision 2, dated February 9, 2022

<u>Design and Commercial-Grade Dedication Records</u>

- Engineering Change Request (ECR) KNECR00039, dated April 7, 2026
- KNECR00040, dated April 2, 2026
- KNECR00045, dated July 1, 2026
- KNECR00046, dated August 6, 2026
- Engineering Change Notice (ECN) Nos. KNECN00039, dated April 7, 2026

- KNECN0040, dated April 7, 2026
- KNECR00045, dated July 1, 2026
- KNECR0046, dated August 13, 2026
- Drawing No. B-21653, “Rubber Seat Detail, 18” Rubber Seat Butterfly Valve,” Revision 2, dated August 11, 2026
- Drawing No. F-379, “Finished Burned Body, ASME Section III Standard, Nuclear Class 3, 18” N-MKII Plain Stem Valve,” Revision 2, dated August 11, 2026
- Drawing No. F-368, “18” Finished Cast Disc,” Revision 2, dated June 19, 2008
- Drawing No. C-75440, “General Arrangement (GA) Drawing, Pratt NMKII Class 2 Nuclear Valve, NPS 8 Series 1400 Safety-related,” Revision 1, dated January 24, 2024
- Drawing No. C-75441, “Cross Section Drawing, Pratt NMKII Class 2 Nuclear Valve, NPS 8 Series 1400 Safety-related,” Revision 3, dated January 24, 2024
- Quality Assurance Documentation Package for NPS 6 NMK-II Body and Disk, Part Nos. 52350921DD-4-1 and 240837-9, dated June 19, 2025
- Quality Assurance Documentation Package for NPS 8 NMK-II Class 2 Butterfly Valve, Part No. 2679395DD-1-1, dated September 17, 2024
- Spare Parts Specification Sheet for packing, Part No. 654115, dated March 24, 2026
- Spare Parts Specification Sheet for O-Ring, Part No. 669588, dated March 24, 2026
- Test Report No. 488481 for purchase order (PO) No. 56315460 ON, dated June 30, 2026
- Test Report No. 481018 for PO No. 56302334 ON, Revision 1, dated July 1, 2026
- Test Report No. 474583 for PO No. 56290379 ON, dated January 28, 2026
- Test Report No. 461963 for PO No. 56274250 ON, dated September 11, 2025
- Test Report No. 453501 for PO No. 56261507 ON, dated June 4, 2025
- Test Report No. 49716 for PO No. 56242631 ON, dated October 10, 2025
- Test Report No. 488481, Revision 1, for PO No. 56315460 ON, dated September 16, 2026

- Test Report No. 481018, Revision 2, for PO No. 56302334 ON, dated September 16, 2026

- TDS Testing Notice, dated September 16, 2026

- Receiving Inspection Checklist/Record for 15 pieces of bronze bearing, Heat/Lot No. 865734, Part No. 737238-NUC, Vendor PO No. 56247452 ON, dated June 9, 2025

- Receiving Inspection Checklist/Record for 2 pieces of an adapter plate, Heat/Lot No. RSB703, Part No. 1119670, Vendor PO No. 56242828 ON, dated January 9, 2026

- Receiving Inspection Checklist/Record for 10 pieces of a thrust collar, Heat/Lot No. 104804, Part No. 834828, Vendor PO No. 56243272 ON, dated November 19, 2025

- Receiving Inspection Checklist/Record for 5 pieces of an O-ring, Heat/Lot No. 415219, Part No. 669688, Vendor PO No. 56242631 ON, dated October 13, 2025

- Dimensional Report for Part No. 737238-NUC, Vendor PO No. 56247452 ON, dated June 9, 2025

- Dimensional Report for Part No. 119670, Vendor PO No. 56242828 ON, dated December 30, 2025

- Dimensional Report for Part No. 834828, Vendor PO No. 56243272 ON, dated October 24, 2025

- Dimensional Report for Part No. 669688, Vendor PO No. 56243272 ON, dated September 17, 2025

- Certificate of Analysis No. 250529-0014-1 for PO No. 56260985 ON, dated May 30, 2025

- Certificate of Analysis No. 250529-0014-2 for PO No. 56260985 ON, dated May 30, 2025

- Certificate of Analysis No. 260106-0017-1 for PO No. 56290997 ON, dated January 8, 2026

- Certificate of Analysis No. 251111-0035-1 for PO No. 56284639 ON, dated November 18, 2025

- CGD No. 501, “Bearing - Bronze ASTM B-438 CT-1000-K26 Grae I, Type II,” Revision 4, Part No. 737238, drawing No. B-14305, Revision 3

- CGD No. 500, “Adapter Plate - Steel Plate or Cast,” Revision 1, Part No. 1119670, drawing No. B-21859, Revision 1

- CGD 515, “Thrust Collar/Bearing - Including Thrust Washer(s),” Revision 0, Part No. 834828, drawing No. B-16062, Revision 2

- CGD 510, “O-Ring - Buna-N or EPDM Material,” Part No. 669688, drawing No. B-12256, Revision 26

- CGD No. 514, “Packing - Buna-N or EPDM Material,” Revision 1, Part No. 654115, drawing No. B-012163, Revision F

Nondestructive Examination and Welding Records

- Weld Procedure Specification (WPS)-Gas Tungsten Arc Welding (GTAW)-4242N-G, Revision 0, dated March 1, 2024

- WPS-Gas Metal Arc Welding (GMAW)-0101N-G, Revision 3, dated October 18, 2023

- WPS-GMAW-0801N-G, Revision 1, dated March 24, 2023

- WPS-GMAW-4242N-G, Revision 1, dated July 13, 2023

- Procedure Qualification Record (PQR)-GTAW-4242N-G, dated March 1, 2024

- PQR-GMAW-0101N-G, dated October 18, 2023

- PQR-GMAW-0801-N-G, dated March 8, 2023

- PQR-GMAW-4242N-G, dated April 3, 2023

- Fabrication and Inspection Record for Part Nos. 2242122, 994824, Base Metal P8-P1, dated September 17, 2025

- Fabrication and Inspection Record for Part No. 994824, Base Metal P8-P8, dated September 17, 2025

- Liquid Penetrant Report for Part No. 653707, Heat No. 240837, dated June 17. 2025

- Visual Examination Report for Part No. 653707, Heat No. 240837, dated June 16, 2025

- Visual Examination Report for Part No. 2242124, Heat Nos. H726/E4A075, dated September 17, 2025

- Liquid Penetrant Report for Part No. 2242124, Heat Nos. H726/E4A075, dated September 17, 2025

- Ultrasonic Testing Report for Part No. 1149907, dated February 18, 2019

- Radiographic Examination Report for Part No. 653423, dated November 21, 2020

Calibration, Inspection, and Test Records

- Calibration Certificate No. SO35867-4-005, dated January 20, 2026

- Calibration Certificate No. SO35867-4-004, dated January 20, 2026
- Calibration Certificate No. SO35867-3-001, dated February 9, 2026
- Calibration Certificate No. SO35867-4-059, dated January 22, 2026
- Calibration Certificate No. SO34870-1-004, dated June 3, 2025
- Calibration Certificate No. SO35595-4-032, dated November 14, 2025
- Calibration Certificate No. SO31477-1-003, dated March 2, 2023
- Calibration Certificate No. SO33611-3-017, dated August 20, 2024
- Calibration Certificate No. SO32657-1-041, dated January 24, 2024
- Calibration Certificate No. SO35595-4-031, dated November 14, 2025
- Calibration Certificate No. SO34191-4-083, dated January 26, 2025
- Calibration Certificate No. SO35867-4-011, dated January 20, 2026
- Calibration Certificate No. SO35867-4-009, dated January 20, 2026
- Calibration Certificate No. SO35867-4-007, dated January 20, 2026
- Calibration Certificate No. SO35867-4-010, dated January 20, 2026
- Calibration Service Receiving Inspection for PO No. 56183711 ON, dated February 7, 2024
- Calibration Service Receiving Inspection for PO No. 56239181 ON, dated February 5, 2025
- Calibration Service Receiving Inspection for PO No. 56293130 ON, dated February 19, 2026
- Nuclear Pressure Gage Log for Master Gage No. 240305100002

Purchase Orders, Audit Reports, and Annual Evaluations

- Henry Pratt Company Approved Vendor List, dated August 14, 2026
- Carboline Annual Supplier Evaluation, dated August 1, 2025
- Audit No. 2023-05 Audit Checklist, dated December 14, 2023
- Audit No. 2023-05 Audit Report, dated December 14, 2023

- Audit No. 2026-01 Audit Checklist, dated March 4, 2026
- Audit No. 2026-01 Audit Report, dated March 12, 2026
- Audit No. 2025-01 Checklist, dated April 22, 2025
- Audit No. 2025-01 Report, dated April 22, 2025
- Audit No. 2026-02 Audit Checklist, dated April 1, 2026
- Audit No. 2026-02 Audit Report, dated May 5, 2026
- Audit No. 2024-04 Audit Checklist, dated July 17, 2024
- Audit No. 2024-04 Audit Report, dated July 26, 2024
- Henry Pratt 2023 Internal Audit Checklist, dated March 3, 2023
- Henry Pratt 2023 Internal Audit Report, dated March 29, 2023
- Henry Pratt 2024 Internal Audit Checklist, dated July 8, 2024
- Henry Pratt 2024 Internal Audit Report, dated July 8, 2024
- Henry Pratt 2025 Internal Audit Checklist, dated November 21, 2025
- Henry Pratt 2025 Internal Audit Report, dated July 5, 2026
- Henry Pratt 2026 Internal Audit Checklist, dated September 8, 2026
- Henry Pratt 2026 Internal Audit Report, dated September 8, 2026
- PO No. 56288138 ON, Revision 2, dated December 9, 2025
- PO No. 56247591 ON, Revision 9, dated March 24, 2025
- PO No. 56279505 ON, Revision 2, dated June 4, 2026
- PO No. 56307646 ON, Revision 1, dated June 26, 2026
- PO No. 56308425 ON, Revision 0, dated April 29, 2026
- PO No. 56309145 ON, Revision 0, dated May 12, 2026
- PO No. 56283531 ON, Revision 0, dated November 5, 2025

- PO No. 56307713 ON, Revision 1, dated June 30, 2026
- PO No. 56201437 ON, Revision 0, dated May 21, 2024
- PO No. 56204425 ON, Revision 0, dated May 31, 2024
- PO No. 56212166 ON, Revision 3, dated October 14, 2024
- PO No. 56180868 ON, Revision 4, dated September 4, 2024
- PO No. 56297417 ON, Revision 3, dated June 30, 2026
- PO No. 56288138 ON, Revision 0, dated December 4, 2025
- PO No. 56247591 ON, Revision 0, dated February 21, 2025
- PO No. 56279505 ON, Revision 0, dated October 6, 2025
- PO No. 56307646 ON, Revision 0, dated April 23, 2026
- PO No. 56307713 ON, Revision 0, dated April 23, 2026
- FPL/PSL PO No. 02499403, Revision 0, dated August 5, 2026
- FPL/PSL PO No. 02499412, Revision 0, dated August 5, 2026
- Constellation PO No. 01604417, Revision 1, dated July 30, 2026
- Constellation PO No. 01604417, Revision 0, dated July 30, 2026
- PO No. 56315460 ON, Revision 0, dated June 17, 2026
- PO No. 56181486, Revision 0, dated December 11, 2023
- PO No. 56302334 ON, Revision 0, dated March 19, 2026
- PO No. 56290379 ON, Revision 1, dated January 27, 2026
- PO No. 56274250 ON, Revision 0, dated September 2, 2025
- PO No. 56261507 ON, Revision 0, dated May 29, 2025
- PO No. 56260985 ON, Revision 1, dated June 17, 2025
- PO No. 56247452 ON, Revision 1, dated March 31, 2025
- PO No. 56290997 ON, Revision 1, dated January 13, 2026

- PO No. 56242828 ON, Revision 1, dated February 19, 2025
- PO No. 56284639 ON, Revision 1, dated December 1, 2025
- PO No. 56243272 ON, Revision 0, dated January 23, 2025
- PO No. 56276875 ON, Revision 1, dated October 9, 2025
- PO No. 56242631 ON, Revision 0, dated January 20, 2025
- PO No. 56284012 ON, Revision 1, dated December 1, 2025
- PO No. 56293130 ON, Revision 2, dated February 27, 2026
- PO No. 56321520 ON, Revision 0, dated August 3, 2026
- PO No. 56321443 ON, Revision 0, dated July 31, 2026
- PO No. 56252632 ON, Revision 6, dated June 30, 2025
- PO No. 56239181 ON, Revision 3, dated February 5, 2025
- PO No. 56243810 ON, Revision 0, dated January 28, 2025
- TVA PO No. 7852822, Revision 3, dated June 23, 2026
- American Electric Power PO No. C1011112, Revision 2, dated April 13, 2026
- Receiving Inspection Checklist/Record Certified Material R6144 Slab 1, dated March 31, 2026
- Receiving Inspection Checklist/Record Certified Material R6191 Slab 1, dated March 31, 2026
- Receiving Inspection Checklist/Record Certified Material 53172342DD-1, dated April 18, 2026
- Receiving Inspection Checklist/Record Certified Material 53654012DD-1, 51533001DD-1, 54049908DD-1, dated September 2, 2026
- Receiving Inspection Checklist/Record Certified Material 52103117DD-1, dated August 3, 2026
- Receiving Inspection Checklist/Record Certified Material 2783148DD-1, dated August 10, 2026

Nonconforming Material Reports (NMRs)

- NMR Nos. 2300-0721, 2300- 0843, 2300-0977, 2400-1498 2400-1556, 2400-1577, 2400-1763, 2400-1768, 2400-1841, 2500-2061, 2500-2096, 2500-2118, 2500-2120, 2500-2314, 2600-2687, and 2600-3105

Corrective Action Reports

- Root Cause Counter Measure (RCCM) Nos. 2023-21, 2023-27, 2024-002, 2024-004, 2024-005, 2024-014, 2024-026, 2025-008, 2025-014, 2025-016, 2025-023, 2026-003, 2026-005, 2026-009, and 2026-012

Corrective Action Reports Opened During the NRC Inspection

- RCCM Nos. 2026-011, 2026-017, 2026-018, 2026-019, 2026-020, 2026-021, 2026-022, 2026-023

Training and Qualification Records

- Brian Tuteur Lead Auditor Qualifications, dated November 20, 2023
- Nick Sebring Auditor Qualifications, dated October 13, 2025
- Bobbie Allman Lead Auditor Qualifications, dated August 26, 2025
- Kenneth Kilgore Auditor Qualifications, dated October 6, 2025
- Jeremy Dykes Auditor Qualifications, dated May 8, 2024
- Latia Gary Auditor Qualifications, dated March 10, 2026
- Scott Borland Lead Auditor Qualifications, dated August 21, 2026
- Ed Webb Lead Auditor Qualifications, dated February 9, 2026
- Derek Frasier Certification of Qualification of Personnel, dated August 19, 2026
- Testing Operators: Rolando Ramirez and Zachary Bullock
- Nuclear Product Inspectors: Derick Frazier and Robert Cook
- Chanel Booker NDE Qualifications for Level II PT, dated April 30, 2024
- Chanel Booker NDE Qualifications for Levell II VT, dated April 30, 2024
- Steve Lippai NDE Qualifications for Level III VT, PT, MT, RT, dated August 14, 2025

- Kyle Russell Welder Performance Qualifications for Gas Tungsten Arc Welding of Type 400 to Type 400 Monel, dated February 9, 2024

- Patrick Moats Welder Performance Qualifications for Gas Metal Arc Welding of SB564 Type 400 Monel, dated June 29, 2023

- Patrick Moats Welder Performance Qualifications for Gas Metal Arc Welding of SA240 Type 304 Stainless Steel, dated June 15, 2023

- William Densmore Certifying Engineer Qualifications dated May 20, 2026, expiration date September 30, 2027