



April 11, 2007
EAM-07-005

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Subject: Indication of Due Date Extension and Clarification to Nonconformance 99901 35912006-201-01 response associated NRC Inspection Report 99901 35912006-201

The purpose of this document is to inform you of the need for a date extension for corrective action implementation associated with Nonconformance 99901 35912006-201-01 identified in Inspection Report 99901 35912006-201. The revised response also provides clarification to the response provided by AREVA NP Inc. on September 26, 2006 (EAM-06-016). A Condition Report has been issued to document the due date extension as well as the clarification to the response (CR 2006-1620).

Due Date extension and clarification to the previous response is provided in Attachment 1 of this letter; the information is documented after the original responses in red italics. Evidence of corrective actions will be available upon request or at the next NRC Inspection.

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads 'Emily A. Mayhew'.

Emily A. Mayhew
Vice President, U.S. Region Quality
AREVA NP Inc.

Attachment

IE09

Attachment 1

NRC Inspection Report 99901 35912006-201 and Notice of Nonconformance

Reply to Notice of Nonconformance 99901 35912006-201-01

Notice of Nonconformance 99901 35912006-201-01

Criterion XVI, "Corrective Action," of Appendix B to 10 CFR Part 50, states, in part, that measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected. The identification of the significant condition adverse to quality, the cause of the condition, and the corrective action taken shall be documented and reported to appropriate levels of management.

AREVA NP Plants Quality & Environment Management (QEM) Manual (QM DC 55) Revision F, dated March 05, 2005, Section 5.5.2, "Corrective Actions," states, in part, that the QEM Liaison Officer is responsible for monitoring the corrective action issued within the regional local unit and is responsible for ... making sure that corrective action requests are processed on schedule by organizations in charge.

AREVA NP Inc. Administrative Procedure No. 171 7-06, Revision 01, "Corrective Action Program (WebCAP)," dated October 7, 2005, Section 8.6, "Requesting CR Extensions," requires the assigned individual or Issue Owner to submit a request for extension before the scheduled completion date (due date) is exceeded. Also, Section 8.2, "Screening Section," requires that the Issue Owner complete the screening section of the condition report (CR) within 7 calendar days of the CR being submitted.

Contrary to the above, during the NRC inspectors review of the implementation of the CR process, specific CR documentation, and a July 19, 2006, computer WebCAP report of overdue Condition Reports by various user groups, it was identified that 34 Condition Reports had exceeded their required completion due date and 8 Condition Reports had exceeded the initial 7-day screening time frame. This issue has been identified as Nonconformance 99901 35912006-201 -01.

Reason for the Nonconformance

The WebCAP system automatically sends emails to corrective action owners highlighting any overdue Condition Reports; further, management is kept apprised of overdue Condition Reports. However, even with these tracking mechanisms in place, it appears that there is a high tolerance for overdue Condition Reports. Also, the process for

requesting extensions for Condition Reports is cumbersome. Thus, corrective action owners are reluctant to make extension requests.

Corrective Steps that Have Been Taken and the Results Achieved

Mechanisms are already in place to track and encourage prompt responses to Condition Reports. Senior management is alerted to overdue Condition Reports in staff meetings presided over by the President and CEO of AREVA NP Inc. Over several years of reporting at this level, the number of overdue Condition Reports has significantly reduced. Further screening teams within the product lines and the AREVA NP Inc. Corrective Action Review Board are also tracking overdue Condition Reports and alerting management of their findings.

Corrective Steps that Will Be Taken to Avoid Further Noncompliances (Revised)

The following corrective actions will be taken as a result of this nonconformance:

- 1) Continue with the current mechanisms that are in place as noted above (*no change or clarification is needed*).
- 2) Establish the Condition Report issue owner as the person responsible for assuring the Condition Report is processed in a timely manner and accountable for the overdue deficiency. Currently, the individual at the end of the process (approver) is held accountable for late corrective actions, when typically the issue owner or evaluator has caused the action(s) to become overdue.
- 3) Request an enhancement for the WebCAP tool from the vendor, Qualitech Solutions, Inc. (QSI) called "Due Date by Signature;" this enhancement will allow us to define reasonable incremental due dates for each signature. This feature satisfies processing expectations for timeliness. For example, the 30 days for evaluations can be subdivided into 20 days to complete the evaluation, five days to complete reviews, and five days to complete approvals.
- 4) Simplify the current cumbersome due date extension process for those Condition Reports that truly require extensions to complete. However, the process for requesting extensions will be made more rigorous by escalating to management level for approval after a set number of extensions.

Corrective Actions #2 through 4 rely on a software change to the WebCAP System. The vendor for WebCAP, Qualitech Solutions Inc., provided a proposal for this revision to the software; however, the proposal was inadequate for resolving the current problem. Further discussions are necessary with Qualitech to determine if a resolution can be found and implemented. Further, revision to the Administrative Procedure 1717-06, Corrective Action Program will reflect the changes made to the software system as well as stronger escalation requirements. The due date for this action is therefore increased to September 30, 2007.

- 5) Hold personnel and management accountable for overdue Condition Reports. In the event that Condition Reports are found to be overdue, Quality will issue another Condition Report requiring evaluation and action for the overdue deficiency.

Clarification concerning this action is necessary as it was interpreted recently by a customer auditor that a Condition Report would be written in every instance that a late Condition Report occurred. However, the intent of this action by AREVA NP Inc. was to issue Condition Reports for overdue Condition Reports during trend analysis, internal audit activities, and as part of the Corrective Action Review Board (CARB); monitoring late deficiencies was not meant to be performed on a daily or weekly basis, but rather on a broader time scale. It was not the intent to address every overdue Condition Report with another Condition Report. Therefore, AREVA NP Inc. is providing this clarification in order to communicate specifically the action to be taken.

Revised Date When Corrective Actions Will Be Completed

September 30, 2007.