



E-26348
April 1, 2008

U. S. NUCLEAR REGULATORY COMMISSION
ATTN: Document Control Desk
Washington, DC 20555

SUBJECT: REPLY TO A NOTICE OF VIOLATION

To Whom It May Concern:

As required, Transnuclear Inc. provides our response to the Notice of Violation (NOV) included in NRC Inspection Report No. 72-1021/2007-201.

In order to be fully responsive to the two violations noted in the NOV, our response includes the following attachments:

- Attachment A summarizes those corrective actions taken or planned by Transnuclear (TN) regarding the specific instances cited by the NRC. These include actions taken specific to fabrication of TN licensed products at our subcontractor GE Hitachi Nuclear Energy (GEH).
- Attachment B includes the corrective action responses provided to TN by GEH including a summary of corrective actions taken during and immediately after the inspection.

In addition to the detailed corrective action responses provided in the noted attachments to this letter, TN management assures the NRC that we understand and acknowledge our responsibilities in ensuring conformance of TN licensed products to regulatory requirements. Further, TN believes that the collective results of the actions described in this response and continued implementation of TN's NRC-approved QA Program will provide the necessary and continued assurance that TN fabricated and certified products are fully compliant with the applicable regulatory requirements and license conditions.

We would like to reiterate the following actions previously taken by TN to address performance issues/problems identified at GEH:

- In March 2006 in response to TN's identification of undocumented work activities and attention to detail issues, GEH issued a Stop Work Order to address verbatim compliance to fabrication travelers and procedures.

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- In May 2006, TN implemented full time fabrication oversight coverage at the GEH facility.
- Throughout the 2006 and 2007 time period TN issued sixteen (16) Supplier Finding Reports regarding various QA Program violations at GEH.
- In November 2007, TN identified to GE senior management our continued concern for GEH QA Program implementation issues and the ineffectiveness of corrective actions previously taken to prevent recurrence.
- In December 2007, TN issued a Stop Work Order based on an inadequate extent of condition review by GEH related to the temporary welded attachment issue.

Recognizing that these actions were not sufficient in preventing the identification of issues during the recent inspection by the NRC, TN has evaluated our fabrication oversight processes and determined that improvements are warranted. These actions are specifically focused on enhancing our capabilities to proactively identify performance issues at the earliest practical time when corrective measures can be most easily taken and, more importantly, to reinforce accountability by our fabricators so that performance problems can be prevented. These actions include: (1) performance of an independent assessment of our fabrication oversight processes to evaluate areas for improvement in audit and surveillance planning, and integration of verification activities performed at project and programmatic levels; and (2) performance of programmatic surveillances at major fabricators to ensure continued compliance with their TN-approved QA Programs. With respect to GEH, a programmatic surveillance is currently planned to verify completion of the corrective action commitments noted in Attachment B to this letter and to assess effectiveness of implementation for those specific corrective actions taken to prevent recurrence of the identified conditions.

In addition, TN would like to clarify the following inaccuracies/inconsistencies noted within the referenced NRC Inspection Report No. 72-1021/2007-201:

- In the last paragraph on Page 9 regarding temporary welded attachments, the second 10 CFR Part 21 notification was made to the NRC Document Control Desk on December 20, 2007. A total of five DSCs were shipped with undocumented temporary welded attachments, of which four were sent to Surry Power Station (SPS) and one to North Anna Power Station (NAPS). Two of the four canisters at SPS had been loaded with spent fuel. A hold was placed on the two remaining empty canisters at SPS and one empty canister at NAPS. The associated ASME Code Alternative request approved by the NRC addressed a total of seven DSCs.
- In the second paragraph under “Thermal Heating of DSC Shells” on Page 17, a hold point had always existed in the DSC fabrication traveler for TN to review the results of the dimensional inspections and approve basket insertion.
- In the discussion under “Use of Force to Insert DSC Baskets into DSC Shells” on Page 19, other than the use of external force to insert Basket 10-1 into Shell 2-4, there was

only one other instance of application of external force-the insertion of Basket 10-4 into Shell 2-6. External force was not applied for the insertion attempt on Basket 10-3 into Shell 2-9; in that case, the basket rotated and landed on the top of the lifting blocks at the bottom of the DSC cavity, thereby halting the process prior to full insertion.

Those documents referenced in this response are available for your review at our office in Columbia, MD or at GEH in Canonsburg, PA.

Please do not hesitate to contact me should you require any additional information or have any questions regarding this response.

Very truly yours,



Steven C. White
Director, Corporate Quality Assurance

c: David W. Pstrak
Chief, Rules, Inspections and Operations Branch
Division of Spent Fuel Storage and Transportation
Office of Nuclear Material Safety and Safeguards

T. Neider
R. Grubb
J. Boshoven
D. Campbell
R. Fredericks
G. Guerra
S. Petras
P. Quinlan
W. Sutherland

Attachment A
TN Reply to NRC Notice of Violation

NOV Item	Description/Reason for Violation	Corrective Action Taken/Results Achieved	Preventive Actions to Avoid Further Violations
A.1	NIAC, a third party auditor, was not listed on GEH's ASL as an approved auditing organization. This is contrary to the requirements of GEH Commercial Nuclear Quality Assurance Manual regarding control of procurement and therefore constitutes a violation of 10 CFR 72.150.	Refer to Attachment B for corrective and preventive actions taken by GEH. TN has reviewed the actions taken by GEH in RCA 2007-053 to add NIAC to the ASL as a supplier of audit services and in related RCA 2007-043 to address suppliers that had been removed from the ASL due to expired audit frequency and has found those actions acceptable; no further discrepancies have been noted.	TN will verify continued compliance with GEH procurement requirements, including control of the GEH ASL, through the performance of in-process monitoring and periodic surveillances.
A.2	Segregated, nonconforming, borated aluminum plate, marked as "scrap" was not tagged with a red Hold tag. This is contrary to the requirements of GEH QAP 1500 regarding nonconforming material control and therefore constitutes a violation of 10 CFR 72.150.	Refer to Attachment B for corrective and preventive actions taken by GEH. TN has reviewed the actions taken by GEH in RCA 2007-056 to correct the tagging and inventory of nonconforming plate and has found those actions acceptable. TN also performed a surveillance of material in the GEH shop with outstanding NCRs requiring TN approval to ensure proper segregation and tagging of material; minor discrepancies were identified and have been properly addressed.	TN will verify continued compliance with GEH material control requirements, including control of nonconforming material, through the performance of in-process monitoring and periodic surveillances.
A.3	Quality records required for use of temporary welded attachments were either not generated or maintained in a consistent manner. This is a violation of 10 CFR 72.150 regarding adequacy of procedural controls.	Refer to Attachment B for corrective and preventive actions taken by GEH. TN has reviewed the actions taken by GEH in RCA 2007-035 and has found those actions acceptable. Additional corrective actions were implemented by GEH in RCA 2007-062 due to the initial inadequate extent of condition review for the TWA issue which failed to identify the entire scope of the problem. TN performed an extent of condition review for TWAs utilized on TN products by other fabricators; no further discrepancies have been noted.	TN will verify continued compliance with GEH control of TWAs, including maintenance of required documentation, through the performance of in-process monitoring and periodic surveillances. TN will also verify effectiveness of measures taken by GEH to improve the Corrective Action Program with respect to extent of condition reviews and identification of actions to prevent recurrence through periodic surveillances.

Attachment A
TN Reply to NRC Notice of Violation

NOV Item	Description/Reason for Violation	Corrective Action Taken/Results Achieved	Preventive Actions to Avoid Further Violations
A.4	QAP-960, Revision 5, did not provide proper procedural controls to maintain the computer data base welder continuity program. Specifically, the procedure did not adequately prescribe how to input data and maintain procedural control of the new computer data base welder continuity program. This is a violation of 10 CFR 72.150 regarding adequacy of procedural controls.	Refer to Attachment B for corrective and preventive actions taken by GEH. TN has reviewed the actions taken by GEH and has found those actions acceptable; no further discrepancies have been noted.	TN will verify continued compliance with GEH weld control program requirements, including weld filler material control and welder qualifications, through the performance of in-process monitoring and periodic surveillances.
A.5	Handwritten changes were made to travelers that added welding procedure specification requirements without obtaining required signatures from Quality Assurance. This is contrary to the requirements of GEH QAP 540 regarding work control and therefore constitutes a violation of 10 CFR 72.150.	Refer to Attachment B for corrective and preventive actions taken by GEH. TN has reviewed the actions taken by GEH in RCA 2007-058 and has found those actions acceptable; no further discrepancies have been noted.	TN will verify continued compliance with GEH work control requirements, including documentation associated with shop travelers, through the performance of in-process monitoring and periodic surveillances.
A.6	DSC Assembly (1062) traveler referred to a nonconformance report (NCR) dispositioned as "repair." Prior to approval of the NCR, a conditional release authorized work to proceed. A point of release was not entered on the traveler as a hold point when the conditional release was issued. This is contrary to the requirements of GEH QAP 230 regarding conditional release of material and therefore constitutes a violation of 10 CFR 72.150.	Refer to Attachment B for corrective and preventive actions taken by GEH. TN has reviewed the actions taken by GEH in RCA 2007-058 and has found those actions acceptable; no further discrepancies have been noted.	TN will verify continued compliance with GEH work control requirements, including documentation associated with conditional releases, through the performance of in-process monitoring and periodic surveillances.

Attachment A
TN Reply to NRC Notice of Violation

NOV Item	Description/Reason for Violation	Corrective Action Taken/Results Achieved	Preventive Actions to Avoid Further Violations
A.7	Travelers 32PTH-5-1 and 2, specific to completed fuel compartments, contained Quality Control cleanliness inspection hold points that were not signed, yet work had proceeded beyond the hold points. This is contrary to the requirements of GEH QAP 540 regarding work control and therefore constitutes a violation of 10 CFR 72.150.	Refer to Attachment B for corrective and preventive actions taken by GEH. TN has reviewed the actions taken by GEH in RCA 2007-058 and has found those actions acceptable; no further discrepancies have been noted.	TN will verify continued compliance with GEH work control requirements, including documentation associated with shop travelers, through the performance of in-process monitoring and periodic surveillances.
A.8	Sequence 290 on a completed traveler for a DSC (001-C), involving rework associated with meeting stack-up requirements, contained a pen and ink change that stated "top shield plug re-machined to satisfy stack-up requirement." While Sequence 290 allowed rework of the top cover plate to satisfy stack-up requirements, it did not allow reworking of the top shield plug. GEH failed to initiate an NCR to document that stack-up requirements could not be met without machining of the top shield plug. This is contrary to the requirements of GEH QAP 1500 regarding nonconforming material control and therefore constitutes a violation of 10 CFR 72.150.	Refer to Attachment B for corrective and preventive actions taken by GEH. TN has reviewed the actions taken by GEH in RCA 2007-058 and CAR 44476 and has found those actions acceptable; no further discrepancies have been noted. TN has approved a "use-as-is" disposition for the NCR issued against the affected top shield plug.	TN will verify continued compliance with GEH work control requirements, including documentation associated with shop travelers, through the performance of in-process monitoring and periodic surveillances. In addition, TN will monitor fabrication activities to ensure that production work is stopped and an NCR initiated when direction is needed to proceed with work that is not controlled by the associated shop traveler(s).
A.9	GEH failed to document on an NCR the unsuccessful attempt to insert DSC Basket 10-4 under its own weight into DSC Shell 2-6. This is contrary to the requirements of GEH QAP 1500 regarding nonconforming material control and therefore constitutes a violation of 10 CFR 72.150.	Refer to Attachment B for corrective and preventive actions taken by GEH. TN has reviewed the actions taken by GEH in RCA 2007-058 and has found those actions acceptable; no further discrepancies have been noted.	TN will verify continued compliance with GEH work control requirements, including documentation associated with shop travelers, through the performance of in-process monitoring and periodic surveillances. In addition, TN will monitor fabrication activities to ensure that production work is stopped and an NCR initiated when direction is needed to proceed with work that is not controlled by the associated shop traveler(s).

Attachment A
TN Reply to NRC Notice of Violation

NOV Item	Description/Reason for Violation	Corrective Action Taken/Results Achieved	Preventive Actions to Avoid Further Violations
B	A welder was shown as qualified to perform two separate welding processes, yet his qualification to do so had actually lapsed. This is a violation of 10 CFR 72.156 regarding control of special processes.	Refer to Attachment B for corrective and preventive actions taken by GEH. TN has reviewed the actions taken by GEH in RCAs 2007-051 and 2007-055 and has found those actions acceptable; no further discrepancies have been noted.	TN will verify continued compliance with GEH weld control program requirements, including welder qualifications, through the performance of in-process monitoring and periodic surveillances.

Attachment B
TN Reply to NRC Notice of Violation



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April 1, 2008

Mr. Steve White
Director, Corporate Quality Assurance
Transnuclear, Inc
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Subject: U.S. NRC Inspection Report No. 72-1021/2007-201 and
Notice of Violation

Dear Mr. White:

Within the subject report the NRC expressed concern over the extent of QA programmatic issues at the GE Hitachi (GEH) Custom Fabrication facility as a result of the inspection conducted between October 29 and November 2, 2007. During the second week of inspection, conducted January 14 through 17, 2008, the NRC had the opportunity to review corrective actions from the first week of inspection and observe initiatives that are aimed to improve the performance of the GEH QA program.

The purpose of this letter is to (1) identify the activities being implemented or planned to improve the overall effectiveness of the QA program implemented at the Custom Fabrication facility, and (2) specifically address the items identified by the NRC in the Notices of Violation (NOV). GEH Requests for Corrective Action (RCAs) or Corrective Action Requests (CARs) were initiated during the course of the inspection for most of the individual items identified in the NOV. The inspection report listed one issue (Item A.9) not specifically addressed as part of the NOV during the inspection close out. A CAR has been initiated for this issue; each item has now been addressed within the GEH corrective action program. The attached matrix identifies each individual item in the NOV, the corresponding RCA or CAR number, and the status of implementation of the corrective and preventive actions.

NOV Item A specifically identifies instances where activities affecting quality were not prescribed in documented procedures, or where procedures for activities affecting quality were not followed. In addition to the RCAs and CARs addressing each instance, GEH has implemented additional programmatic QA improvements that include the following:

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- Implementation of a robust corrective action program that provides a line of sight not only to Custom Fabrication management but to GEH General Managers and ultimately the GEH President; web-based management including e-mail prompts to pending actions, an integrated root cause tool based on the TapRoot process of evaluation, and a regular peer critique process to ensure effective implementation.
- Updating of the Custom Fabrication Quality Assurance Procedures to reflect changes since the acquisition of Ionics by GEH and associated training of personnel. Regular scheduled quality topics are delivered in the Toolbox Talk sessions held weekly with all manufacturing and quality control personnel.
- Performance of shop traveler improvement work-outs to simplify the fabrication process and reflect the most efficient sequence of operation.
- Performance of regular management and quality assurance surveillances to monitor proper and accurate documentation of activities on shop travelers; and the tracking and trending of results to provide feedback to shop personnel on their performance.
- Launching of an INPO-based Human Performance (HU) improvement program that has included the training of personnel in basic HU tools such as self-checking, peer checking, pre-job briefs, and use of a questioning attitude.

Furthermore, GEH is launching additional program improvements in the second quarter of this year that include the implementation of an electronic system for identification and documentation of nonconforming conditions. This system will provide a line of sight to the Custom Fabrication management team to real-time data, improve trending of nonconforming conditions and therefore improve corrective action opportunities.

The quality improvement activities described above are being tracked to completion in the GEH Commitment Tracking System (CTS) which is the basis of the corrective action program described above.

NOV Item B specifically identifies an instance where a welder was shown as qualified to weld; however, his qualification to do so had lapsed. As identified on the attached matrix, this item was documented in RCA 2007-055. Corrective actions for this item included having the affected welders perform the qualification tests necessary to establish their qualification. The affected welders passed these qualification tests.

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To prevent recurrence of this condition, the database used to maintain welder continuity has been corrected and responsible personnel trained in the use of the database. The procedure used to control welder continuity data has been revised to provide instructions to the personnel responsible for entering the data necessary to monitor the maintenance of welder qualifications. In addition, periodic evaluations of the database have been scheduled to check for accuracy and completeness of data and reports.

GEH is committed to supporting the nuclear industry and our customers and is continuing to identify opportunities for improvement of the effectiveness of our quality program as well as the efficiency of our operations. Please let us know if additional assistance is required to support your reply to the subject NOV.

Yours truly,

A handwritten signature in black ink, appearing to read "Robert E. Glazier", with a stylized flourish at the end.

Robert E. Glazier

GE Hitachi Nuclear Energy
Requests for Corrective Action (RCA) and Corrective Action Requests (CAR)
for Items Identified in NRC Notice of Violation

NOV Item	Description GEH RCA / CAR	Corrective Action	Preventive Action	Status
A.1	NIAC, a third party auditor, was not listed on GEH's ASL as an approved auditing organization. RCA 2007-053	<ol style="list-style-type: none"> 1. QAP-1820, "Procedure for evaluation of Third Party Audit Reports", was revised to identify NIAC as a third party provider of audit services. 2. A third party evaluation was conducted and documented in accordance with QAP-1820 to accept the audit of NIAC. 3. A supplier evaluation was performed and documented in accordance with QAP-700, "Supplier Qualification and Oversight" to add NIAC to the ASL. 4. NIAC was added to the ASL as a supplier of audit services. 	GEH Custom Fabrication did not renew NIAC membership for 2008 and will not be using NIAC as a provider of audit services in 2008.	Complete
A.2	Segregated, nonconforming, borated aluminum plate, marked as "scrap," was not tagged with a red Hold tag. RCA 2007-056	<ol style="list-style-type: none"> 1. Revised applicable NCR (2007-705B) to include additional plates. 2. Reviewed all material in the nonconforming material hold area and verified that all tags accurately matched the material. 	<ol style="list-style-type: none"> 1. Provided training on QAP-1500, "Nonconforming Material Control", to shop personnel. 2. Established regular management assessment/walk-through focused on nonconforming material. 	Complete
A.3	Quality records required for use of temporary weld attachments were either not generated or maintained in a consistent manner. RCA 2007-035	<ol style="list-style-type: none"> 1. Document temporary weld attachment (TWA) issue in RCA. 2. Issue NCRs for affected canister units and affected in-process components. 3. Completed NDE of accessible locations of TWAs on units shipped to Dominion facilities. 4. Completed NDE of accessible locations of TWAs on units remaining at GEH. 5. Provide corrected/complete documentation for certification of shipped canisters per TN and Dominion requirements. 6. Corrective action also included performance of a review of the extent of condition for previously fabricated products. 	<ol style="list-style-type: none"> 1. Conducted shop stand-downs on each shift to inform work force (operators and inspectors) and supervision of the issue and to reinforce requirements of QAP-950, "Control of Temporary Attachment Welds", and importance of verbatim procedural compliance. 2. Modified traveler to include steps to attach and subsequently remove TWA and for PT and UT thickness examination. 	Complete

GE Hitachi Nuclear Energy
Requests for Corrective Action (RCA) and Corrective Action Requests (CAR)
for Items Identified in NRC Notice of Violation

NOV Item	Description GEH RCA / CAR	Corrective Action	Preventive Action	Status
A.3 (cont)			<ol style="list-style-type: none"> 3. Modified TWA map form to include blanks for including nondestructive test results as human-factors "trigger" to remind operators and inspectors, as well as reviewing QA team that PT and UT thickness evaluations are required. 4. Modified standard travelers for non-TN projects to reference requirements associated with TWAs. 5. Revised QAP-1700, "Quality Assurance Records", to specify requirements for duplicating and storing quality control inspection records and trained inspection team. 6. Revised QAP-950 to minimize confusion pertaining to NDE requirements for TWAs. 7. Conducted specific training on revised QAP-950 to QC inspection team. 8. Conducted training for production team regarding documentation of non-standard or non-routine work practices. 9. Reviewed incident and root cause analysis with production supervision and reinforced need for frequent overview of traveler packages for accuracy and completeness. 10. Scheduled quarterly QA surveillance of work activities and proper documentation in traveler package. 11. Implemented use of visual indicator in traveler package or components to clearly indicate when inspection is needed after TWA removal. 	

GE Hitachi Nuclear Energy
Requests for Corrective Action (RCA) and Corrective Action Requests (CAR)
for Items Identified in NRC Notice of Violation

NOV Item	Description GEH RCA / CAR	Corrective Action	Preventive Action	Status
A.4	QAP-960, Revision 5, did not provide proper procedural controls to maintain the computer data base welder continuity program. Specifically, the procedure did not adequately prescribe how to input data and maintain procedural control of the new computer data base welder continuity program. RCA 2007-055/RCA 2007-051	Revised QAP-960, "Welding Process Control" to account for both manual and database tracking of welder continuity.	<ol style="list-style-type: none"> 1. Initiated periodic check by Welding Engineer to evaluate the weld continuity database and reports for accuracy and completeness of data. 2. Training has been provided to responsible personnel on the requirement for QAP's and work instructions to include sufficient information to assure that the task(s) to be completed can be performed in a consistent manner. 	Complete
A.5	Handwritten changes were made to travelers that added welding procedure specification requirements without obtaining required signatures from Quality Assurance. RCA 2007-058	Travelers were corrected at the time of the inspection.	<ol style="list-style-type: none"> 1. Implemented regular manufacturing surveillance program to identify and document traveler and shop documentation errors. 2. Initiated Human Performance (HU) improvement program including training employees in basic HU tools such as self checking, peer checking, pre-job briefs, and questioning attitude. 3. Shop personnel have been instructed on requirement for approval of hand written changes to travelers. 	Complete
A.6	DSC Assembly (IO62) traveler referred to a nonconformance report (NCR) dispositioned as "repair." Prior to approval of the NCR, a conditional release authorized work to proceed. Contrary to this requirement, a point of release was not entered on the traveler as a hold point when the conditional release was issued.	<p>The NCR (2007-684) was originally dispositioned "rework" by GEH and the work performed. TN subsequently identified that the NCR disposition should have been "repair", requiring TN approval. The incorrect disposition was documented as RCA 2007-039.</p> <p>The procedure for Management Conditional Release (MCR) was revised to provide for monitoring and oversight of the MCR process by the Quality Manager.</p>	Documentation of Management Conditional Release hold points on travelers has been addressed in RCA 2007-058 discussed in Item A.5 above.	Complete

GE Hitachi Nuclear Energy
Requests for Corrective Action (RCA) and Corrective Action Requests (CAR)
for Items Identified in NRC Notice of Violation

NOV Item	Description GEH RCA / CAR	Corrective Action	Preventive Action	Status
A.6 (cont)	RCA 2007-039 RCA 2007-058	Documentation of MCR hold points on travelers has been addressed in RCA 2007-058 discussed in Item A.5 above.		
A.7	Travelers for 32PTH-5-1 and 2, specific to completed fuel compartments, contained Quality Control cleanliness inspection hold points that were not signed, yet work had proceeded beyond the hold points. RCA 2007-058	Cleanliness inspection had been performed prior to production involving several travelers. However, the QC hold point was not signed on all travelers. Travelers were corrected at the time of the inspection.	<ol style="list-style-type: none"> 1. Implemented regular manufacturing surveillance program to identify and document traveler and shop documentation errors. 2. Initiated Human Performance (HU) improvement program including training employees in basic HU tools such as self checking, peer checking, pre-job briefs, and questioning attitude. 3. Recent audit of supplier included review of in-process operations and travelers and discussion with responsible personnel to ensure they are aware of requirement for observation of designated hold points. 	Complete
A.8	Sequence 290 on a completed traveler for a DSC (001-C), involving rework associated with meeting stack-up requirements, contained a pen and ink change that stated "top shield plug re-machined to satisfy stack-up requirement." While Sequence 290 allowed rework of the top cover plate to satisfy stack-up requirements, it did not allow reworking of the top shield plug. CAR 44476	Issued NCR (2008-506) for missed NDE operation on Top Shield Plug.	<ol style="list-style-type: none"> 1. Revised traveler 32PTH sequence 290 to identify that rework may affect Top Shield Plug and require VT and PT of affected surfaces. 2. Revised QAP-540, "Work Instructions", to alert personnel to consider the affect of traveler changes on previously completed operations. <p>Production personnel have been instructed on their responsibility to have a questioning attitude and to obtain additional instruction from their Production Advisor or Project Manager or generate an NCR as appropriate.</p>	Complete

GE Hitachi Nuclear Energy
Requests for Corrective Action (RCA) and Corrective Action Requests (CAR)
for Items Identified in NRC Notice of Violation

NOV Item	Description GEH RCA / CAR	Corrective Action	Preventive Action	Status
A.9	GEH failed to document the unsuccessful attempt to insert DSC Basket 10-4 under its own weight into DSC Shell 2-6 on an NCR, as required by QAP-1500. CAR 44932	The use of force was previously addressed on NCR 2006-676 and RCA 2006-027.	Production personnel have been instructed on their responsibility to have a questioning attitude and to obtain additional instruction from their Production Advisor or Project Manager or generate an NCR as appropriate.	Complete
B	A welder was shown as qualified to perform two separate welding processes, yet his qualification to do so had actually lapsed. RCA 2007-055	<ol style="list-style-type: none"> 1. Administered welder performance qualification test for affected welders. 2. Notified GEH Project Managers of the results of the extent of condition and affected projects. 	<ol style="list-style-type: none"> 1. Modified welder continuity program/database to track weld material issuance and maintenance of welder qualifications, and provide accurate report. 2. Conducted training on use of welder continuity database for issuers of weld material. 	Complete