



## Shaw Modular Solutions

May 23, 2012

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United States Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555-0001

### References:

- 1) Docket No. 99901401
- 2) Nuclear Regulatory Commission (NRC) Inspection Report 99901401/2011-202, Notice of Nonconformance (NON)
- 3) Shaw Modular Solutions (SMS) response to NON 99901401/2011-202-05 dated March 9, 2012
- 4) NRC Request for Additional Information (RAI) dated April 4, 2012

Shaw Modular Solutions (SMS) has evaluated the NRC RAI related to our response to NON 99901401/2011-202-05 that included the following statement.

“Specifically, your response to NON 99901401/2011-202-05 did not provide adequate detail for the staff to conclude that your proposed corrective actions would meet the requirements of the American Welding Society (AWS) D1.1 and D1.6. Please clarify your response to indicate whether the new Welder/Welding Operator Qualification history Log (WQHL) references information such as weld joint number, weld record, or maintenance record that can be used to verify that the welder maintained their qualification using the welding process on the date listed in the WQHL in accordance with a qualified AWS weld procedure specification.”

SMS provides the following clarification.

The SMS response to NON 99901401/2011-202-05 stated that procedure QP-PC-04 would be revised by March 30, 2012 to provide detailed steps for completing new hire paper work for welders, the roster and the Welder or Welding Operator Qualification History Log. Revision 9 to procedure QP-PC-04 was issued for use on March 29, 2012. For clarification of terminology only, there are now two documents being used at SMS documenting welder qualifications and maintenance thereof. These are the Welder/Welding Operator Qualification Roster and the Welder or Welding Operator Qualification Continuity Log. The Welder/Welding Operator Qualification Roster references the date of expiration based on the six (6) month cycle outlined in procedure QP-PC-04 and the appropriate AWS Code of construction. The document that supports the six (6) month continuity cycle is the Welding Operator Qualification Continuity Log (WQCL). This log will be updated and reviewed by an independent person who will utilize a variety of methods to verify an individual's use of welding processes.



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SMS response to NRC RAI for NON 99901401/2011-202-05, continued

These methods may include, but are not limited to, review of traveler packages, weld joints, and weld or maintenance records, as well as actual visual witness verifications during the processes performed. These verifications will be documented and independently verified. Additionally, the Welding Department is providing a thorough review of the WQCLs to ensure that documentation is available in the welder records and provides objective evidence that the processes are utilized by the welders/operators to maintain continuity and qualification.

This clarification should provide the information needed to enable the NRC staff to conclude that our corrective actions comply with ASW D1.1 and D1.6 requirements. If further information is required please do not hesitate to contact me.

Sincerely,

Joseph L. Ernst  
Executive Vice President  
Shaw Modular Solutions

cc: Mr. Edward H. Roach, Chief  
Mechanical Vendor Branch  
Division of Construction Inspection and Operational Programs  
Office of New Reactors  
United States Nuclear Regulatory Commission  
D. Chapman  
K. David  
G. Grant

**Docket Number: 99901401/2011-202**

**We believe that NRO/DCIP received the enclosed original hard copy of this letter from the vendor. We could not find a copy in ADAMS. Please place this letter in ADAMS as publicly available and send the accession number to:**

**Antoinette.Sakadales@NRC.GOV and**

**Kerri.Kavanagh@NRC.GOV**

**Thank you.**

**Toni Sakadales**

**Program Analyst**

**NRO/DCIP**

**301-415-6441**