



February 15, 2013

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

SUBJECT: REPLY TO A NOTICE OF NONCONFORMANCE

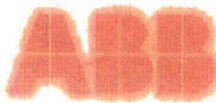
To Whom It May Concern:

The following information is provided in support of corrective actions for notice of nonconformance for Nuclear Regulatory Commission Inspection Report Number 99901256/2012-201.

A. Nonconformance 99901256/2012-201-01 – Failure to verify critical characteristics related to dielectric strength for K-Line circuit breakers. ABB Corrective Action Request (CAR) Number 201200146 was originated to track actions.

- 1) The reason for the nonconformance was attributed to human error in that the Senior Tester inputted the wrong information on the hard copy inspection and test forms.
- 2) The corrective steps that have been taken included correction of the inspection and test records, Operations and Quality Manager interviews and counseling with the Senior Tester, training with all production inspectors and testers given by the Operations Supervisors with participation of Operations and Quality Managers and review of records for similar inaccuracies. The results achieved were satisfactory. Interviews indicate Senior Tester understands high potential test requirements and associated work instructions. Training and process review meeting with all production inspectors and testers indicate adequate level of knowledge with opportunities to improve subject inspection and test report forms.
- 3) The corrective steps that have been taken to avoid further noncompliance is revision to the WI-INSP-56 forms to include required high potential voltage test settings in lieu of having the tester fill in the data by hand. An additional action taken has been training and reassignment of an assembly team leader as a Mechanical Inspector to provide additional oversight and review of production inspection and test activities and documentation. Future corrective steps that will be taken to avoid further noncompliance include periodic production surveillances performed in accordance with current internal audit processes and standardization of new legacy, roll-in-replacement and refurbished circuit breaker inspection and test forms with minimal handwritten inputs to mitigate use of incorrect forms or similar human errors.
- 4) This corrective action is considered complete. CAR 201200146 has been closed by the Resolution Owner with verification by the Quality Manager. The standardization of inspection and test forms is a 2013 Operational Excellence Project that is expected to be fully implemented in the second quarter 2013. The first internal audit of inspection and test records including Calibrated Test Equipment Record is scheduled for 3/29/2013 to be performed by Operations Manager and Operations Supervisor.
- 5) The corrective steps that have been taken to avoid further noncompliance is revision to the WI-INSP-56 forms to include required high potential voltage test settings in lieu of having the tester fill in the data by hand. An additional action taken has been training and reassignment of an assembly team leader as a Mechanical Inspector to provide additional oversight and review of production inspection and test activities and documentation. Future corrective steps that will be taken to avoid further noncompliance include periodic production surveillances performed in accordance with current internal audit processes and standardization of new legacy, roll-in-replacement and refurbished circuit breaker inspection and test forms with minimal handwritten inputs to mitigate use of incorrect forms or similar human errors.

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B. Nonconformance 99901256/2012-201-02 – Failure to assure all measuring and test equipment used in the inspection of K-Line and HK circuit breakers within the inspection record. ABB Corrective Action Request (CAR) Number 201200145 was originated to track actions.

- 1) The reason for the nonconformance was attributed to Product Support Center (PSC) production inspectors and production testers not adequately following processes. The PSC personnel that used the calibrated torque wrench and go no-go gage during production activities failed to input the measuring and test equipment information into the Calibrated Test Equipment Record.
- 2) The corrective steps that have been taken included verification that calibrated equipment was within calibration periodicity, updating of the Calibrated Test Equipment Records and training with PSC and production inspector and testing personnel to assure understanding of process controls and calibration program requirements. The results achieved were satisfactory based upon spot checks of document packages for completed PSC work.
- 3) The corrective steps that will be taken to avoid further noncompliance include periodic production surveillances performed in accordance with current internal audit processes.
- 4) This corrective action is considered complete. CAR 201200145 has been closed by the Resolution Owner with verification by the Quality Manager. The first internal audit of inspection and test records including Calibrated Test Equipment Record is scheduled for 3/29/2013 to be performed by Operations Manager and Operations Supervisor.

C. No personal privacy or proprietary information is included in this response.

D. Should additional Objective Evidence be necessary to provide assurance of corrective actions, please contact the ABB Medium Voltage Service Quality Manager at victor.h.romano@us.abb.com or via office telephone (843) 413-4727.

Sincerely,

Victor H Romano, PMP
ABB MVS Quality and OpX Manager
2300 Mechanicsville Road
Florence, SC 29501

Copy: Chief, Construction Electrical Vendor Branch
Office of New Reactors Division of Construction Inspection & Operational Programs
ABB PPMV Nuclear Program Manager

February 15, 2013

U.S. Nuclear Regulatory Commission
ATTN: Document Control
Washington, DC 20545-00

SUBJECT: REPLY TO A NOTICE OF NONCONFORMANCE

To Whom: [Redacted]

The following information is provided in support of corrective actions for notice of