

May 8, 2013

Mr. Brian D. Sullivan, Quality Assurance Director
Weir Valves & Controls USA, Inc.
29 Old Right Road
Ipswich, MA 01938

SUBJECT: WEIR VALVES AND CONTROLS' RESPONSE TO THE U.S. NUCLEAR
REGULATORY COMMISSION INSPECTION REPORT NO. 99900746/2013-201
AND NOTICE OF NONCONFORMANCE

Dear Mr. Sullivan:

Thank you for your April 26, 2013 letter in response to the Notice of Nonconformance (NON) that was discussed in the subject U.S. Nuclear Regulatory Commission (NRC) inspection report (IR).

We have reviewed your letter and found that it is not fully responsive to some of the NONs discussed in IR 99900746/2013-201. Specifically,

1. Your response to NON 99900746/2013-201-01 stated that Weir Valves & Controls' (WVC) Engineering Department will review all the dedication packages dating back to August 1, 2012. Please clarify your response to indicate what other actions WVC will take to verify that the critical characteristics and acceptance criteria identified for dedications performed before August 1, 2012 can be appropriately traced back to a technical evaluation to provide reasonable assurance that the item would perform its intended safety function.
2. Your response to NON 99900746/2013-201-02 stated that the dead weight tester error was conservative. If the gauges were tested at a higher pressure than intended, a gauge would have to provide a low reading to pass the erroneous expected pressure. A low-reading gauge could be non-conservative when testing requires a minimum pressure. Please provide the technical basis used by WVC to determine that the dead weight tester error was conservative. You also stated that WVC corrected the Weight Chart to reflect the correct values but did not indicate whether the document was properly controlled. Please clarify to indicate whether the Weight Chart is being controlled by your document control program.
3. Your response to NON 99900746/2013-201-04 stated that the corrective action steps taken and completed included updating WVC procedure CP-Q-38 to include the inspection of fillet and tack welds in accordance with Section NC-4427 of Section III of the ASME Code, and training on the procedure revision and Code requirement. Although these corrective actions address the finding with respect to the inspection of fillet and tack welds in the future, it does not address whether the completed fillet and tack welds met the requirements of the ASME Code. Please clarify your response to

indicate what other actions WVC will take to verify that the completed fillet and tack welds met the requirements of Section NC-4427 of the ASME Code.

4. Your response to NON 99900746/2013-201-06 states, in part, that "CAR [Corrective Action Request] 13-51 was issued to address the fact [that] C of C's [Certificates of Conformance] from a supplier did not address all of the certifying requirements. While WVC issued CAR 09-01 and closed this CAR, the NRC requested that a larger extent of condition review be performed which was agreed to by WVC. No evidence of this extent of condition review could be found at the time of the 2013 inspection." Please clarify your response to indicate whether WVC has performed an extent of condition to verify if others C of C's were inadequately verified by WVC receipt inspectors. In addition, please clarify the corrective steps that have been taken and the results achieved; the corrective steps that will be taken to avoid further noncompliance; and (4) the date when the corrective action will be completed.
5. Your response to NON 99900746/2013-201-06 stated that an extent of condition review was performed for open orders but the extent of condition did not include the root of the issue which was Kalsi Engineering. Please clarify your response to indicate whether the extent of condition will include all closed/shipped orders that used Kalsi Engineering.

In accordance with Title 10 of the *Code of Federal Regulation* (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 Public Document Room or from the NRC's Agencywide Documents Access and Management System, accessible from the NRC 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 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 is 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 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 safeguards information 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."

B. Sullivan

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Please contact Mr. Yamir Diaz-Castillo at (301) 415-2228 or via electronic mail at Yamir.Diaz-Castillo@nrc.gov, if you have any questions or need assistance regarding this matter.

Sincerely,

/RA/

Edward H. Roach, Chief
Mechanical Vendor Branch
Division of Construction Inspection
and Operational Programs
Office of New Reactors

Docket No.: 99900746

B. Sullivan

- 3 -

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Brian.Sullivan@weirgroup.com
Todd.McKinney@weirgroup.com

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OFFICE	NRO/DCIP/CMVB	NRO/DCIP/CMVB
NAME	YDiaz-Castillo	ERoach
DATE	05/7/2013	05/8/2013

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