



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
WASHINGTON, D.C. 20555-0001

February 26, 2020

Susana Santidrián
OPR3 Quality Assurance Engineer
ENSA Equipos Nucleares S.A. S.M.E.
Av. Juan Carlos I, 8,
39600 Maliaño, Cantabria, Spain

**SUBJECT: ENSA, EQUIPOS NUCLEARES S.A. S.M.E RESPONSE TO THE
MULTINATIONAL DESIGN EVALUATION PROGRAM VENDOR INSPECTION
REPORT, NO. 99901379/2019- 201, AND NOTICE OF NONCONFORMANCE**

Dear Ms. Santidrián:

Thank you for your February 5, 2020, 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 NON 99901379/2019-201-01. Specifically, your response to NON 99901379/2019-201-01 failed to address several areas of concern to the MDEP Team. Please clarify your response as follows:

1. The response states that ENSA issued Nonconformance Report (NCR) 2PR3/003 Rv.00, dated January 24, 2020, to address the nonconformance. The MDEP inspection team reviewed the contents of the NCR and identified that the explanation of the performance deficiency does not adequately describe the issue.

Specifically, the ENSA NDE Level II inspector did not review the ENSA drawing prior to commencing the inspection to determine the primary area to be inspected and therefore did not question or modify the orientation of the plate so that the primary area was readily accessible and directly observable. Rather, the response states that the issue was caused by a misunderstanding between the Audit team and ENSA during the PT examination in terms of raised different specification wording interpretations. A description of the deficiencies that caused the nonconformance should be revised in your response to adequately describe the issue and the associated corrective actions to be taken.

2. The ENSA Level II inspector had to use mirrors, to prepare and inspect the underside of the plate (the primary area) and did not assure the primary area was examined with an illumination of at least 500 lux, nor was the light intensity routinely checked during the examination to assure adequate lighting, contrary to ENSA procedure OPR3CS401, "Liquid Penetrant Procedure," Revision 2, dated February 4, 2019. These issues should be addressed in your response.
3. In addition, as described in MDEP inspection report 99901379/2019-201 examples of activities not being performed in accordance with the requirements of procedure OPR3CS401 include:

- a. not determining if the weld prep area was dry prior to applying the developer;
- b. the primary area to be examined was underneath the piece and was only accessible with a mirror, which is not allowed by procedure OPR3CS401, or qualified as such;
- c. since the primary area was under the part, the ENSA Level II inspector applied the developer with the aerosol can upside down at times to reach underneath the part, which could result in uneven developer application. The procedure requires the ENSA Level II inspector to monitor during application of the developer, behavior of any indications and bleed out and to ensure that the correct amount of developer is applied, which was not performed since the primary area was not readily accessible.
- d. Lastly, it could not be determined if the ENSA Level II inspector met the procedure OPR3CS401 requirements for preventing disturbing reflections and bright spots with the use of the flashlight and mirror under the part.

These issues should also be addressed in your response.

4. The NCR does not address any extent of condition review to assure that other NDE activities previously performed were adequate and in accordance with procedural requirements.

In accordance with Title 10 of the *Code of Federal Regulations* (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."

Please contact Mr. Greg Galletti at 301-415-1831, or via electronic mail at Greg.Galletti@nrc.gov, if you have any questions or need assistance regarding this matter.

Sincerely,

Kerri A. Kavanagh, Chief **/RA/**
Quality Assurance and Vendor Inspection Branch
Division of Reactor Oversight
Office of Nuclear Reactor Regulation

Docket No.: 99901379

EPID No.: I-2019-201-0062

SUBJECT: MULTINATIONAL DESIGN EVALUATION PROGRAM VENDOR INSPECTION
REPORT OF ENSA, EQUIPOS NUCLEARES S.A. S.M.E, NO. 99901379/2019-
201, NOTICE OF NONCONFORMANCE Dated: February 26, 2020

DISTRIBUTION:

ASakadales

John.Gillespie@onr.gov.uk

Russ.Booler@onr.gov.uk

Jeremy.HUBERT@asn.fr

Laure.MONIN@asn.fr

Isabel.PEDRAZA@asn.fr

ConE_Resource

ADAMS Accession No.: ML20045E348 NRR-088

OFFICE	NRR/DRO	NRR/DRO
NAME	GGalletti	KKavanagh
DATE	02/26/2020	02/26/2020

OFFICIAL RECORD COPY