



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

August 8, 2008

Subject: Reply to Notice of Violation and Notice of Nonconformance

Reference: NRC Report 99900378/2008 - 201

Namco Controls, Inc.'s reply to the Notice of Violation and Notice of Nonconformance is attached. Appendix A provides further details to the Notice of Violation and to the Notice of Nonconformance.

As indicated in the appendix, Namco is committed to resolve these issues to prevent future nonconformance in this area.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jamey Robbins', is written over the typed name.

Jamey Robbins  
Plant Manager  
Namco Controls

A handwritten signature in black ink, appearing to read 'Ken Gould', is written over the typed name.

Ken Gould  
Quality Manager  
Namco Controls

cc: John A Nakoski, Chief  
Quality & Vendor Branch 2  
Division of Construction Inspection & Operational Programs  
Office of New Reactors

TE09  
NRW

## **Appendix A**

The purpose of this document is to provide further details to Namco's response to U.S. Nuclear Regulatory Commission Inspection Report 99900378/2008-201.

### **A. Notice of Violation 9900378/2008-201-02**

Namco Standard Practice (NSP) 60-0012, "Reporting of Defects Per 10 CFR Part 21, " did not provide adequate procedural guidance to meet the requirements of 10 CFR Part 21:

As part of the corrective action, the ordering system was updated to include the modified requirements. The staff is concerned that the lack of training regarding these changes to Namco's ordering system may result in personnel not recognizing the importance of this modification when generating purchase orders that are submitted to qualified Appendix B suppliers.

#### **Additional Explanation**

1. Training was conducted with affected individuals.

#### **Corrective Action**

Training was conducted with all affected persons.

#### **Date for Full Compliance**

Full compliance was achieved on Aug 7, 2008.

### **B. Notice of Nonconformance 9900378/2008-201-03**

The NON was associated with Namco's failure to verify vendor's control of critical characteristics during commercial grade surveys. Namco's response stated that supplier surveys will specifically state the critical characteristics that must be verified. The NRC staff is concerned that the survey is still not including the component that those characteristics apply to.

#### **Additional Explanation**

1. Namco is using the NUPIC survey checklist which has a section that must be filled out regarding the product or service that is being provided.

#### **Corrective Action**

Namco changed to the NUPIC commercial grade survey checklist which includes the critical characteristics and the product or service that is being provided.

#### **Date for Full Compliance**

Full compliance was achieved on May 2, 2008.

### **C. Notice of Nonconformance 9900378/2008-201-08**

The response to NON 99900378/2008-08 was inadequate regarding the failure of not maintaining a list of controlled copies.

#### **Additional Explanation**

1. Namco's procedure states that there are 2 controlled copies of the quality documents – one in the inspection area and one in storage. The table of contents for each of the manuals serves as the list of controlled documents.

#### **Corrective Action**

1. Namco created a separate list of controlled documents that is maintained by the Quality Manager.

#### **Date for Full Compliance**

1. Full compliance was achieved on August 5, 2008.

### **D. Notice of Nonconformance 9900378/2008-201-09**

The response to NON 99900378/2008-201-09 was inadequate regarding the identification of training and qualifications requirements for assembly, inspection, quality test, and audit personnel.

#### **Additional Explanation**

Namco misinterpreted the finding. The training was completed for all personnel but the procedure did not specifically state the training requirements for all quality personnel.

#### **Corrective Action**

The procedure was changed to include the training requirements for quality personnel.

#### **Date for Full Compliance**

Full compliance was achieved on August 5, 2008.