9/16/15
mark as original.
a Sunsi review has been completed.

EMERSON.
Process Management

Fisher Controls International LLC
301 South First Ave.
P.O. Box 190
Marshalltown, Iowa 50158-0190
USA

August 12, 2015

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

Subject: NRC Inspection Report No. 99900105/2015-201, Notice of Nonconformance Request for Additional Information.

References: 1) NRC Notice of Nonconformance 99900105/2015-201-01.
2) NRC Report No. 99900105/2015-201

Fisher Controls International LLC ("Fisher Controls") hereby responds to the request for additional information related to the aforementioned Notice of Nonconformance (Reference 1), dated May 22, 2015. The nonconformance was identified during the Nuclear Regulatory Commission's ("NRC") inspection (Reference 2) of Fisher Controls' Marshalltown, Iowa facility, conducted April 13-17, 2015 by inspectors Aixa Belen-Ojeda, Jonathan Ortega-Luciano, Raju Patel, Paul Prescott, Andrea Keim, and Jason Christensen

Please contact me at (641)754-2249 if you have any questions or need to discuss this matter further.

Sincerely,

Ben Ahrens

Ben Ahrens
Manager, Quality
Fisher Controls International LLC

Attachments

FISHER

IE09
NRO

Attachment 1

This Attachment 1 sets forth the reply of Fisher Controls International LLC ("Fisher Controls") to the NRC's Request for Additional Information relative to NRC Inspection Report 99900105/2015-201 (the "Inspection Report"), Notice of Nonconformance 99900105/2015-201-01 (the "Nonconformance").

NRC Question 1:
Question 1 states the following:

> *The response to NON 99900105/2015-201-01, example 2 discussed several completed and planned corrective actions, including the validation of those corrective actions identified as significant conditions adverse to quality. Clarify if the evaluation included all corrective action reports to confirm that they were properly categorized as conditions adverse to quality or significant conditions adverse to quality. Additionally, please describe the extent-of-condition review to determine if there are similar issues that could impede the ability of valves that have been dedicated to perform their intended safety function.*

Fisher Controls Response to Question 1:

During the aforementioned evaluation, which had been performed to confirm extent of condition was properly identified, Fisher Controls determined all Corrective Action Reports reviewed had been categorized appropriately as either Condition Adverse to Quality or Significant Condition Adverse to Quality.

Fisher Controls has issued Corrective Action 1745 to address the full extent of condition.

The NRC inspection team identified three (3) corrective actions that were generated for the failure to identify and dedicate parts considered essential-to-function, which are needed for the valve assemblies to perform their intended safety-related function. The need for the three (3) corrective actions was identified as a failure to properly perform a full extent of condition assessment as part of the first corrective action. A similar issue was identified during the review, in which an initial corrective action inadequately determined the full extent of condition and subsequent corrective actions were required. Specifically, Fisher CARs 1575, 1590, and 1615 were all issued between November 2012 and April 2013 for improper installation of limit switches. The investigation from CAR 1745 concluded that all proper notifications have been made (ML13073A108 and ML13122A127), and no other shipped items are in question. It was also determined that the corrective actions taken are adequate to prevent recurrence.

The review also identified one instance where the extent of condition was inadequate, but there have not been any subsequent corrective actions. Specifically, Fisher CAR 1587 was for Type 546 and 546NS transducers that were not performing properly. All required notifications were made (MIL13015A306). The inadequacy found was that Fisher Controls did not verify if a similar performance issue was possible on other models of transducers. As a part of CAR 1745, this review has been completed and no further notifications are required.

NRC Question 2:
Question 2 states the following:

> *The response to NON 99900105/2015-201-01, example 3 stated that the customer reviewed and accepted this material based on suitability for their service prior to Fisher Control's fulfillment of the order. Provide the objective evidence where the customer*

accepted the change in materials of the elastomer. In addition, Fisher Controls also stated that the 'Material List' discussed during the inspection is a reference library maintained exclusively by Fisher Controls' Materials Engineering group and is a resource that is independent of design control. Clarify if Fisher Controls generated a corrective action to maintain configuration controls for the reference 'Material List' and how the configuration controls are maintained relative to replacement parts.

Fisher Controls Response to Question 2:

The Nonconformance identified the need for Fisher Controls to establish configuration control for radiation capabilities of elastomers. Pursuant to the referenced corrective action CAR 1752 issued June 12, 2015, an engineering standard was created to maintain such configuration controls exclusively for radiation capabilities of all elastomers used in nuclear applications by Fisher Controls. This standard, EP63, is in the formal review process with an expected release by September 4, 2015. The remainder of the information located in the reference 'Material List' is not within the scope of the aforementioned engineering standard.

As it pertains to all orders including replacement parts, if the material requested by a customer is not available or appropriate, the purchase order placed with Fisher Controls shall be revised to reflect the updated material per Fisher Manufacturing Procedure FMP2Q11 and Fisher General Work Instruction GWI-001. Pursuant to CAR 1697, the order will be placed on hold until the revised purchase order is received.

Please refer to Attachment 2 for objective evidence of the customer acceptance of the change in materials of the elastomer specifically in regards to the customer purchase order in question.

It is requested that portions of Attachment 2 be withheld from public disclosure. The objective evidence consists of email communication between Fisher Controls sales office, John H. Carter Company, and the customer whose order is subject to this CAR, and would create an unwarranted invasion of personal privacy to disclose customer's and customer's personnel's names and contact information. Furthermore, Fisher Controls does not have permissions from those involved in the email communication to make this conversation public. A bracketed copy of this response has been provided which includes the requested evidence, along with a redacted copy with portions of Attachment 2 removed.

Attachment 2 – Request Withholding from Public Disclosure

This Attachment 2 contains the requested objective evidence of the customer acceptance of the change in materials of the elastomer specifically in regards to the customer purchase order in question.

It is requested that portions of Attachment 2 be withheld from public disclosure. The objective evidence consists of email communication between Fisher Controls sales office, John H. Carter Company, and the customer whose order is subject to this CAR, and would create an unwarranted invasion of personal privacy to disclose the customer's and customer's personnel's names and contact information. Furthermore, Fisher Controls does not have permissions from those involved in the email communication to make this conversation public. A bracketed copy of this response has been provided which includes the requested evidence, along with a redacted copy with portions of Attachment 2 removed entirely.

From: [redacted]
Sent: Tuesday, December 02, 2014 10:24 AM
To: [redacted]
Subject: RE: PO [redacted] Discrepancy

[redacted],
I appreciate your help. This should be good.
Back onto the part number issue, the material cert was done to PF67CFR-NU11 and not FS67CFR-239/V/VP. In order to receive it as FS67CFR-239/V/VP, I'll need a new C of C done to the actual assembly part number. We didn't receive anything saying that the part we got has the p/n FS67CFR-239/V/VP.

Thanks,

[redacted]
Procurement Engineering
[redacted]

From: [redacted]
Sent: Tuesday, December 02, 2014 10:17 AM
To: [redacted]
Subject: RE: PO [redacted] Discrepancy

[redacted]
Attached are BOM's for both the standard FS67CFR-239 filter/regulator and the FS67CFR-329/V/VP as shipped by Fisher. The parts that are greyed in on the Standard construction BOM are the parts that changed.

[redacted]

From: [redacted]
Sent: Monday, December 01, 2014 11:50 AM
To: [redacted]
Subject: RE: PO [redacted] Discrepancy

[redacted],
Do you happen to have a list with the material of all of the parts? The new one (w/ Viton) and the original (NBR). I'll have to do an equivalency and I'll need to compare the material of all of the significant parts. Having a list of the materials would help with this.

Thanks,

[redacted]
Procurement Engineering
[redacted]

From: [redacted]
Sent: Monday, December 01, 2014 11:29 AM
To: [redacted]
Subject: RE: PO [redacted] Discrepancy

[redacted]
The Stem/Plug is changing from p/n T14053T0012 which is Brass/Nitrile to p/n T14121T0022 which is an Aluminum Stem with Viton plug.

Regards,

[redacted]

From: [redacted]
Sent: Monday, December 01, 2014 11:16 AM
To: [redacted]
Subject: RE: PO [redacted] Discrepancy

Great. What about the stem? I'm looking at a tech manual and it says that FKM (Viton) isn't an option with the Brass stem. It shows the two options with FKM to be SS or Aluminum, do you know which it is?

From: [redacted]
Sent: Monday, December 01, 2014 11:04 AM
To: [redacted]
Subject: RE: PO [redacted] Discrepancy

[redacted]
The only parts in the 67CFR regulator that have been changed to Viton are (2) O-rings (keys 4 and 14), the plug and the diaphragm. The wording on the letter was a little confusing but these are the only parts that were changed to Viton.

[redacted]

End of Attachment 2