







Steam & Air Solutions (SAS)

Business Transition and Quality Management System Update











Background

- Curtiss-Wright (C-W) acquired the Terry Turbine Nuclear Safety Related product line from Siemens Government Technologies (SGT) (formerly Dresser-Rand (D-R)) on April 2, 2018 and established the SAS business unit to run the business acquired from SGT.
- 24-month Supply Agreement Between SGT and C-W
 - SGT supplier of manufacturing direct labor
 - C-W/SAS will continue to use SGT policies/procedures/approvals, etc.
 - Business and engineering systems remained integrated. SGT and SAS functioning as one organization, vice SGT functioning as an independent supplier to SAS.
- Coincident with the business acquisition, SGT announced their decision to close the existing facility in Wellsville, NY in 24 months.
- SGT manufactured SAS products in the existing SGT facility following the existing SGT Quality Management System.
- SAS committed to retaining the existing SGT quality requirements until those requirements were superseded by a corresponding SAS requirement, or otherwise canceled, as a function of transitioning manufacturing to the Summerville, SC facility.



Background (cont'd)

- SAS personnel in Wellsville, NY operated under the SGT Quality Management System. SAS did not have a Quality Manual.
- SGT was obligated to uphold the rigor of the Quality Management System that was in place at the time of acquisition.
- SAS transitioned business and manufacturing operations from the Wellsville, NY facility to a new facility in Summerville, SC.
- Certain business functions, while administered out of Summerville,
 SC continue to operate out of an office facility in Wellsville, NY.
- The transition out of the SGT manufacturing facility completed in April, 2020.
- SAS is now wholly conducting manufacturing operations from the Summerville, SC location with all employees responsible for product quality under the SAS Quality Management System.



2019 NUPIC Audit

- NUPIC (Dominion Lead) audited SAS, at the SGT facility, from 21 25 Oct 2019
 - SAS employees performed engineering, sales, and some quality functions (e.g., order entry/review and certifications), with support from SGT personnel
 - SAS Quality personnel reported locally to Wellsville, NY supervision
- The audit team identified 10 findings, covering most 10 CFR 50 Appendix B Criterion
- Concluded the QA program in Wellsville was <u>ineffective</u>
 - SGT QA Manager remained responsible for Wellsville, NY Quality Management System but managed largely in-absentia
 - Significant SGT QA Department personnel reduction after announcing the planned plant shutdown; one engineer and one part-time QA Manager remained at time of audit
 - SGT imposed restrictions on SAS employee access to manufacturing areas
 - Some SGT personnel were adversarial towards the audit team
 - SAS was under the SGT quality program; SGT was ineffective. Therefore, SAS was ineffective
- SAS is coordinating with Dominion on actions to formally close the findings from this audit; SAS has responded to all findings



Quality Management System Transition

SAS Quality Assurance Team

- SAS hired QA Manager in May 2019 to develop Quality Management System for Summerville, SC and manage transition from Wellsville to Summerville
 - Attended 2019 NUPIC Audit and participated as a learning opportunity
 - Recipient of 2019 Audit Report and owned SAS response
- SAS Quality personnel in Wellsville, NY realigned under SAS QA Manager in January 2020
- Fully staffed new Quality Assurance Department
 - Ten personnel in engineering or management roles
 - Two previous SGT Quality employees associated with the nuclear business in Wellsville are part of the SAS team.



Quality Management System Transition (cont'd)

SAS Quality Management System Development

- SAS Quality Management System Manual
 - Original revision issued in November 2019 (after the NUPIC Audit in Wellsville)
 - Revised ,with guidance from NUPIC members, to ensure alignment with 10 CFR 50 Appendix B
- Implementing Procedures
 - Developed, or updated where appropriate, new implementing procedures supporting required quality programs
 - Some SGT/D-R programs that align with Summerville, SC operations remain in effect
- SAS implemented corrective actions to address the issues with the SGT QA program and ensure those issues did not transfer to operations in Summerville
- From March 2020 through today, SAS hosted many NUPIC member visits for source inspection and/or source surveillance; feedback afforded external validation of corrective actions and identified opportunities to further improve SAS QA programs



2021 NUPIC Audit Update

- NUPIC (Wolfe Creek Lead) audited SAS, at the Summerville facility, from 18 – 21 Jan 2021
- The audit team identified 5 findings and determined SAS was effectively implementing our Quality Management System
- Wolfe Creek and SAS closed out the 2021 audit with all responses accepted and actions completed
 - Wolfe Creek Itr Ser PA 21-0022; Closeout of Curtiss-Wright, Steam & Air Solution,
 NUPIC Audit 25032, dated August 12, 2021
 - "Based on the results of this closeout review, CW-SAS has effectively improved the implementation of their QA program for the nuclear industry."

2022 NRC Audit

- NRC audited SAS, at the Summerville facility, from 14 18 Mar 2022
- The NRC inspection team found the implementation the SAS QA program met the applicable technical and regulatory requirements imposed on SAS by our customers or NRC licensees.
- No findings of significance were identified
- NRC identified three minor issues
- SAS is addressing these minor issues via our Corrective Action **Program**



Business Transition QA Lessons Learned

SGT-CW 24-month manufacturing agreement resulted in two organizations under a single quality program

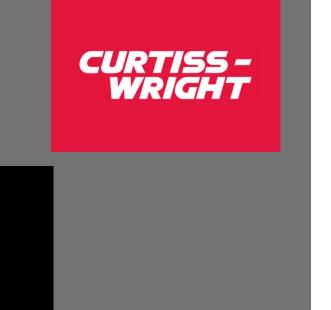
- SAS did not protect ourselves from the risk of SGT QA program degradation (risk realized!)
- After C-W established SAS, SAS should have:
 - Staffed a QA Manager at the beginning of the acquisition
 - Implemented an independent Quality Management System
 - Commenced treating SGT as a supplier
 - Performed a 10 CFR 50 Appendix B audit of SGT
 - Imposed source inspection and source surveillance restrictions on SGT; monitored the SGT QA program health to mitigate risk

Records

- SAS expected that SGT was maintaining all records necessary to meet 10 CFR 50 Appendix
- Uncovered significant gaps in record retention while developing response to 2019 NUPIC Audit findings; too late to take preventive actions
- SAS should have audited SGT critical personnel and supplier records prior to SGT closing the Wellsville, NY facility and decommissioning their network servers







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Curtiss-Wright SAS Manufacturing Overview

- New state-of-the art manufacturing and test facility established November 2019
- Manufacturing and Testing of **Navy Steam Turbines, Valves** and Compressors
- Navy Aftermarket Replacement **Parts Manufacturing for critical** applications focused on a **Stellite Manufacturing Cell**





Curtiss-Wright SAS Manufacturing Capabilities

MANUFACTURING CAPABILITIES

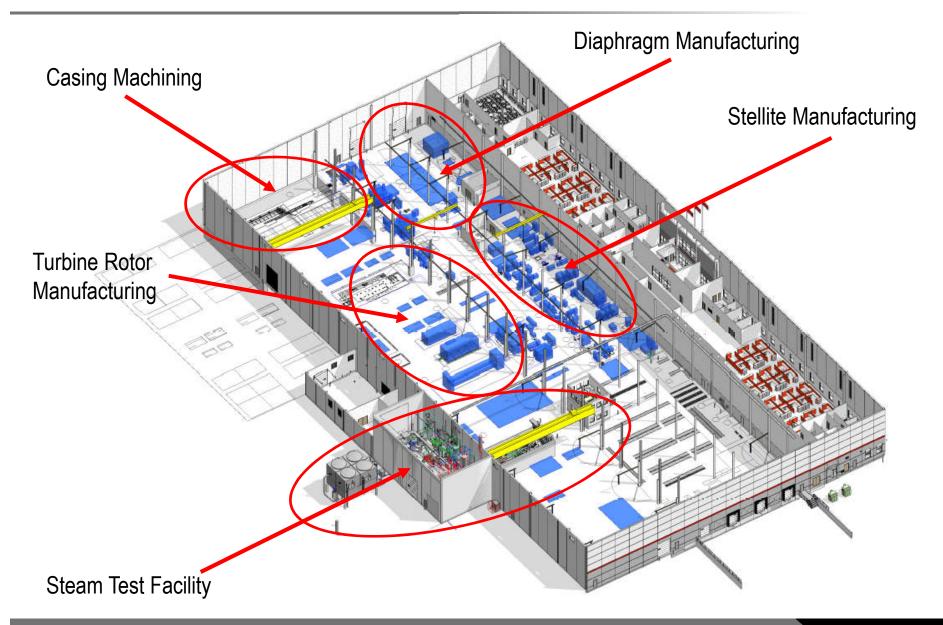
- Steam Testing
- Machining
- Grinding
- Honing
- Weld Fabrication
- Heat Treat
- Steam Turbine Assembly
- Valve Assembly
- Electrical Assembly
- Hydrostatic Testing
- Inspection

RESOURCES

- 70-ton Bridge Crane Capacity
- High Pressure Steam Boiler
- 35 machines (10 CNC)
- Large Heat Treat Furnace 1400F
- Level III NDE
- Certified to ISO 9001:2015, and 10CFR50 Appendix B



Manufacturing – Design Layout



Steam Testing

- High Pressure Steam Boiler
- Deaerator
- Water Treatment System
- Surface Condenser
- Cooling Tower
- Lubricating Oil System
- Reconfigurable Testing Area / Test Stands
 - Mass Flow
 - Up to 50,000 lbs/hr
 - Pressure
 - Up to 1,250 PSIG
 - Temperature
 - Up to 600F







Large Machining

Waldrich Coburg MasterTEC 4500 for Turbine Casing Machining

- 4.5 Meter between Rails
- Two 10 Meter x 3.5 Meter Tables
- 80 Ton capacity per table

WFL MillTurn M150-5000 for Turbine Rotor Manufacturing

- 5 Meter center to center
- 1.5 Meter swing

Fives Giddings & Lewis Vertical Turning Center VTC-2000

- 2 Meter Table
- 2 Meter Rail Height
- C-axis for facing on Centerline Features









Machining & Finishing

MACHINING

FIVES Giddings & Lewis V1600

DMG MORI NTX2500 | 1500A CNC Multi-Task

Mazak Nexus 350 II CNC Lathe

MAZAK VMCÂ - VTC 200/50

FADAL 4020VMC

FADAL 4020VMC

G&L MODEL 70A-D5-T HBM

TUDA Conventional LATHE

36" x 200" with 80" Swing

Warner & Swasey 2A Universal Turret Lathe

4.5" Dia x 36.5" L with 20" Swing

LEBLOND MAKINO REGAL LATHE 19" Swing x 54"

Bridgeport Mill

Bridgeport EZ Trak Mill

GRINDING AND HONING FINISHING

OKAMOTO Surface Grinder ACC 32-80DX (GRIND-X)

JONES & SHIPMAN

Easy Grind 1500E OD GRINDER

KELLENBERGER OD GRINDER

Model 1000 U

Brown & Sharp Surface Grinder

MICROMASTER 824

CINCINNATI MILACRON

CINCO 15 CENTERLESS GRINDER

SUNNEN Horizontal Hone

Model MBB-1800

SUNNEN VERTICAL HONE

Model CV-616

TECHNICA CENTER HOLF GRIND

Model ZSM 6-5100-810

Welding / Metal Joining

WELDING PROCESSES

- Gas Tungsten Arc
- Shielded Metal Arc
- Gas Metal / FluxCored Arc
- Submerged Arc
- Plasma Transferred Arc (hard-surfacing)
- Stud Welding
- Resistance Spot Weld
- Automatic and Manual

SPECIAL APPLICATIONS

- PTA Stellite hardsurfacing (valves, stems, and seats)
- Heat Treat to 1,400F
 (96" x 96" x 48" H)
- Seal Welding
- Dissimilar Metals
- Submerged Arc Overlay
- Soldering per MIL-HDBK-545A, Guideline 5

WELDING CODES

- Tech Pub 248/278
- ASME Section IX



