

Date: May 17, 2016

Subject: Garlock's Nuclear Quality Program

Please find the following information.

NUPIC Status of Garlock (Palmyra, New York):

- Garlock maintains an active nuclear quality program in accordance to 10CFR50 Appendix B and 10CFR21 as detailed in our Quality Manual for select product offerings.
- Our 10CFR50 Appendix B quality program is technically equivalent to ASME NQA-1 1994 Edition Basic Requirements. Both 10CFR50 Appendix B and ASME NQA-1 1994 Edition Basic Requirements are part of the scope of our Quality Manual revision # 22.
- Garlock is periodically audited by the Nuclear Procurement Issues Committee (NUPIC) to the requirements of 10CFR50 Appendix B and 10CFR21 and specific product requirements. Our last NUPIC audit was led by Wolf Creek Nuclear and conducted May 2016. We are also audited periodically by the Nuclear Industry Assessment Committee (NIAC). Our last NIAC audit was led by Whiting and conducted May 2015.

Details of Garlock's (Palmyra, New York) 10CFR50 Appendix B and 10CFR21 Program:

- The quality program is independent from cost/schedule concerns
- Product and material characteristics are very well defined and controlled
- QC inspections are performed by those other than who performed work
- Specialist such as inspectors, calibrators, auditors and welders are thoroughly trained
- Design verifications are performed by those other than original designer(s)
- Design software tools are verified and validated
- An industry accepted Commercial Grade Dedication (CGD) process is used (ref. procedure attached)
- Planned periodic external audits are conducted on 10CFR suppliers
- Product (material) traceability is required and implemented
- Quality records are retained indefinitely
- Shelf-life requirements are defined and implemented
- Special packaging requirements for product protection and long-term storage are used
- Calibration equipment is traceable to products inspected and visa-versa
- 10CFR21 requirements are implemented and posted in Manufacturing.

Best Regards,


Paul Thompson, Sr. Quality Engineer