

December 6, 2001



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Subject: 10CFR Part 21, Notification of Potential Safety Related Noncompliance Deviation

Notification By:

Carboline Company  
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This letter serves to notify the Commission of a potential safety related noncompliance deviation in a basic component as defined in 10CFR Part 21. The noncompliance involves premature gellation or significant thickening prior to the end of the 12-month shelf life expiration date of Carbozinc 11 SG Base. Such material will not atomize or spray properly, resulting in poor adhesion to the substrate. When this occurs the coating cracks during the curing process and the coating flakes off the substrate.

This problem was first identified last year and reported to the NRC and our customers in December, 2001. Carboline has performed root cause analysis and determined that the cause is related to moisture contamination during manufacturing. We have instituted processing changes to address this problem; however we continue to occasionally experience this problem in material that is older than 6-months. A decision has been made to change the published shelf-life to 6-months.

**It is important to realize that if the material has already been used and is tightly adhered it will perform as intended and should remain in place.**

A database has been created documenting all shipments made within the 2002 calendar year; approximately 50 utilities/customers are affected. All customers who our records indicate have purchased Carbozinc 11 SG in 2002 shall be notified promptly. We are requesting that customers review their stock of Carbozinc 11 SG and return any material manufactured prior to June 2002. We will also instruct the customer to use any material produced after June 2002 based on a 6-month shelf-life.

In summary, Carboline has taken appropriate corrective action, notified the NRC, and shall notify all customers promptly.

If you have any questions or need additional information concerning this notification, do not hesitate to contact Dwayne Meyer, Director, Technical Service at (314) 644-1000 extension 2550, or Marikay Speckert, Corporate QA Manager at (314) 644-1000 extension 2456.

Regards,

  
Dwayne Meyer  
Director, Technical Service

  
Marikay Speckert  
Quality Assurance Manager

cc: Dick Wilson, President, Carboline Company  
Dallas Finch, R&D Director, Carboline Company

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