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Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Perry September 18, 2004 LER 2004-001-01: 10CFR Part 21 Filing

Reference: ESW Pump failure of the shaft coupling at the Perry Nuclear Power Plant

This letter is provided jointly by ITT-Goulds and Enertech in response to a September 18, 2004 Licensee Event Report (LER) Supplement (referenced above) submitted by the First Energy Nuclear Operating Company, Perry Nuclear Power Plant. The LER included a Part 21 report, which focuses on ITT-Goulds, the original equipment manufacturer (OEM) of a coupling, which contributed to the inoperability of an essential service water pump on two occasions. The component was supplied through Enertech. ITT-Goulds and Enertech are currently in the process of compiling further technical information to submit to the NRC which will better ensure that the NRC has a full and complete understanding of the coupling failures reported by First Energy. This information will demonstrate that the failures did not result from ITT-Goulds or Enertech actions. ITT and Enertech provided an adequate component and the subject failures do not represent a generic flaw in our product. Furthermore, no actions by ITT-Goulds or Enertech resulted in a substantial safety hazard, and thus, any generic industry noticing, which focuses on actions by ITT-Gould/Enertech, would not be appropriate. We anticipate that justifications for our positions will be submitted within 30 days of this letter. However, if the NRC requires additional information in the interim, we welcome the opportunity to respond to any specific NRC question in a more prompt manner. Please contact Shashank Patel with any questions you may have.

Sincerely,

Shashank Patel

cc: C. Vernon Hodge
J. Dobson
T. Poindexter
J. Leachman

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