

Part 21 (PAR)

Event # 49667

Rep Org: C&D TECHNOLOGIES, INC.	Notification Date / Time: 12/20/2013 11:45 (EST)
Supplier: C&D TECHNOLOGIES, INC.	Event Date / Time: 10/22/2013 (EST)
	Last Modification: 02/24/2014
Region: 1	Docket #:
City: BLUE BELL	Agreement State: Yes
County:	License #:
State: PA	
NRC Notified by: CHRISTIAN RHEULT	Notifications: ANTHONY DIMITRIADIS R1DO
HQ Ops Officer: DONG HWA PARK	KENNETH RIEMER R3DO
Emergency Class: NON EMERGENCY	PART 21 GROUP EMAIL
10 CFR Section: 21.21(a)(2) INTERIM EVAL OF DEVIATION	

PART 21 REPORT - CRACKING IN KCR-13 STANDBY BATTERY JARS

The following was received via facsimile:

"The purpose of this letter is to provide the NRC a report in general conformity to the requirements of 10CFR Part 21.21 (a)(2). On October 22, 2013, C&D Technologies, Inc. (C&D) was informed by Entergy Nuclear Northeast that a KCR-13 battery installed at the Indian Point Nuclear Energy Center had developed a small crack in the polycarbonate jar material. The jar is a safety related component with the primary function of containing electrolyte. C&D does not believe that significant quantity of electrolyte was lost through this crack, because there was a normal level of electrolyte in the battery. This unit has been replaced, and the unit was sent by Entergy to an outside lab, Lucius Pitkin (LPI) of New York, NY, for analysis. As C&D did not have access to the components of the allegedly defective battery, and a report has not yet been issued by Lucius Pitkin, C&D cannot perform a root cause technical evaluation and affirm whether there is any defect in the component or manufacturing process, or whether the reported condition may have been due to user abuse of product, improper maintenance or other negligence or error. No formal report from Entergy or LPI is expected before the expiration of the 60 day limit from the date C&D was notified of the issue. Thus, C&D is submitting this interim report to the NRC and notifying C&D's customers that use C&D KCR-13 batteries of this interim report. [C&D is also] initiating an action plan to evaluate the reported potential defect and determine whether it could pose a substantial safety hazard for any U.S. licensee using such batteries.

"Concurrent actions underway to complete the evaluation: a) On receipt of the final report by LPI/Indian Point by C&D, C&D shall evaluate the findings and the causes for failure. Maximum time 14 days from receipt of the report. b) In conjunction with the licensees identified in section vi, C&D will recommend maintenance assessment of all KCR-13 batteries at these locations to determine their status, and specifically the presence of any evidence of potential defects via visual examination. For any cells exhibiting the presence of potential defect, C&D shall

IE 19
nick

further recommend that they be returned for analysis. Estimated completion date of analysis is thirty (30) days from the receipt of the returned batteries."

KCR-13 batteries are used in Indian Point and Monticello Nuclear Plants.

For further information contact:
Robert Malley
VP Quality and Process Engineering
Office Phone 215-619-7830
Email bmalley@cdtechno.com

*** UPDATE AT 1110 EST ON 02/24/14 FROM CHRISTIAN RHEAULT TO S. SANDIN VIA FAX ***

The following updated information was received from C&D Technologies:

"Subject: Updated Interim Report - Inability to Complete 10CFR Part 21 Evaluation regarding cracking in KCR-13 Standby Battery Jars

"As previously stated, C&D did not have access to the components of the allegedly defective battery, and a report has not yet been issued by Lucius Pitkin. C&D cannot perform a root cause technical evaluation and affirm whether there is any defect in the component or manufacturing process, or whether the reported condition may have been due to user abuse of product, improper maintenance or other negligence or error until a final report is issued by Lucius Pitkin. Although several requests to both Indian Point and Lucius Pitkin have been made, a receipt date for the analysis results is still indeterminate."

If you have any questions or wish to discuss this matter or this report, please contact:

Robert Malley
VP Quality and Process Engineering
Office Phone 215-619-7830
Email bmalley@cdtechno.com

Notified R1 (DeFrancisco), R3DO (Kunowski) and Part 21 Group (via email).



1400 Union Meeting Road
Blue Bell, PA 19422
Phone : (215) 619-2700
Fax: (215) 619-7823

February 21, 2014

VIA FACSIMILE
Nuclear Regulatory Commission
Operations Center
301-816-5151

VIA REGULAR MAIL
Document Control Desk
US Nuclear Regulatory Commission
Washington, DC 20555-0001

VIA OVERNIGHT DELIVERY
US Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852-2746

Subject: Updated Interim Report – Inability to Complete 10CFR Part 21 Evaluation regarding cracking in KCR-13 Standby Battery Jars

As previously stated, C&D did not have access to the components of the allegedly defective battery, and a report has not yet been issued by Lucius Pitkin. C&D cannot perform a root cause technical evaluation and affirm whether there is any defect in the component or manufacturing process, or whether the reported condition may have been due to user abuse of product, improper maintenance or other negligence or error until a final report is issued by Lucius Pitkin. Although several requests to both Indian Point and Lucius Pitkin have been made, a receipt date for the analysis results is still indeterminate.

If you have any questions or wish to discuss this matter or this report, please contact:

Robert Malley
VP Quality and Process Engineering
bmalley@cdtechno.com
(215) 619-7830

Sincerely,
Christian Rheault
President and Chief Executive Officer
C&D Technologies, Inc.

Attachment – Interim Report – Inability to Complete 10CFR Part 21 Evaluation regarding cracking in KCR-13 Standby Battery Jars, dated 12/20/13

Cc: D. Anderson
J. Miller
R. Malley
S. DiMauro
L. Carson
J. Anderson

DiMauro, Steven

From: Burnell, Scott <Scott.Burnell@nrc.gov>
Sent: Thursday, February 20, 2014 2:34 PM
To: DiMauro, Steven
Subject: RE: 10CFR, Part 21 Reporting Requirements

Hello Steve;

I apologize for the delay in getting back to you – it's amazing how cluttered the inbox can get sometimes.

Our staff tells me 10 CFR 21.21(a) requires an evaluation to determine if a deviation could create a substantial safety hazard within 60 days of discovery; an interim report should be issued when the evaluation cannot be completed within 60 days of discovery.

Based on the vendors submittal of an Interim report on December 20, 2013, the staff would expect at a minimum, an update every 60 days until the report is completed. Since the evaluation should be completed in 60 days from the date of discovery, the extension should address justification for extension and an expected revised completion date.

Please let me know if you need anything else. Thank you for your patience.

Scott Burnell
Public Affairs Officer
Nuclear Regulatory Commission

From: DiMauro, Steven [<mailto:SDiMauro@cdtechno.com>]
Sent: Friday, February 07, 2014 12:07 PM
To: OPA Resource
Cc: Malley, Robert; Anderson, David
Subject: 10CFR, Part 21 Reporting Requirements

To Whom It May Concern:

I contacted the NRC Office of Public Affairs this morning to ask a question about reporting requirements. They directed me to ask my question to you.

Background

In the last quarter of 2013, Indian Point (IP) discovered a cracked battery at their facility. C&D Technologies was the manufacturer. As a result, Indian Point chose an independent lab to conduct an analysis in an attempt to determine the cause of the crack.

As you are aware, we are required by 10CFR, Part 21 to submit a notification to both the NRC and affected utilities regarding the situation. Since we have yet to receive the final report from the lab, we issued an interim report to the NRC with the understanding that a final report would be forthcoming. The interim report was issued by C&D on 12-20-2013.

To date we have not received the analysis report conducted by the lab even after several inquiries to my contact at IP. My last request to IP determined that they have also not received the final report from the lab.

My question is – regarding the current situation, what additional reporting requirements if any are we responsible to complete and what is the timeframe for completion?

Steve DiMauro
Quality Systems Manager
1400 Union Meeting Road
Blue Bell, PA 19422-0858 USA
215-619-7849 (office)
484-294-6410 (cell)



1400 Union Meeting Road
Blue Bell, PA 19422
Phone: (215) 619-2700
Fax: (215) 619-7887

December 20, 2013

VIA FACSIMILE
Nuclear Regulatory Commission
Operations Center
301-816-5151

VIA REGULAR MAIL
Document Control Desk
US Nuclear Regulatory Commission
Washington, DC 20555-0001

VIA OVERNIGHT DELIVERY
US Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852-2746

Subject: Interim Report – Inability to Complete 10CFR Part 21 Evaluation regarding cracking in KCR-13 Standby Battery Jars

The purpose of this letter is to provide the NRC a report in general conformity to the requirements of 10CFR Part 21.21 (a)(2). On October 22, 2013 C&D Technologies, Inc. ("C&D") was informed by Entergy Nuclear Northeast that a KCR-13 battery installed at the Indian Point Nuclear Energy Center had developed a small crack in the polycarbonate jar material. The jar is a safety related component with the primary function of containing electrolyte. C&D does not believe that significant quantity of electrolyte was lost through this crack, because there was a normal level of electrolyte in the battery. This unit has been replaced, and the unit was sent by Entergy to an outside lab, Lucius Pitkin ("LPI") of New York, NY, for analysis. As C&D did not have access to the components of the allegedly defective battery, and a report has not yet been issued by Lucius Pitkin, C&D cannot perform a root cause technical evaluation and affirm whether there is any defect in the component or manufacturing process, or whether the reported condition may have been due to user abuse of product, improper maintenance or other negligence or error. No formal report from Entergy or LPI is expected before the expiration of the 60 day limit from the date C&D was notified of the issue. Thus, C&D is submitting this interim report to the NRC and notifying C&D's customers that use C&D KCR-13 batteries of this interim report, and is initiating an action plan to evaluate the reported potential defect and determine whether it could pose a substantial safety hazard for any U.S. licensee using such batteries.

Required information as per 10CFR Part 21.21(d)(4) follows:

- (1) **Name and Address of the Individual or Individuals Informing the Commission**
Christian Rheault (or Designee)
President and Chief Executive Officer
C&D Technologies, Inc.
1400 Union Meeting Road
Blue Bell, PA 19422-0858

(ii) Identification of the facility, the activity, or the basic component supplied for such facility or such activity within the United States which fails to comply or contains a defect.

KCR-13 Batteries, manufactured in 2005, battery manufacturing date is on the label. Note: C&D has not completed its evaluation of the reported potential defect and whether it could pose a substantial safety hazard at any U.S. licensee using such batteries.

(iii) Identification of the firm constructing the facility or supplying the basic component which fails to comply or contains a defect.

C&D Technologies, Inc.
 1400 Union Meeting Road
 Blue Bell, PA 19422-0858

(iv) Nature of the defect or failure to comply and the safety hazard which is created or could be created by such defect or failure to comply.

The cracked jar has not been fully evaluated and may or may not indicate a potential defect which could create a substantial safety hazard.

(v) The date on which the information of such defect or failure to comply was obtained.

October 22, 2013

(vi) In the case of a basic component which contains a defect or fails to comply, the number and location of these components in use at, supplied for, being supplied for, or may be supplied for, manufactured or being manufactured for one or more facilities or activities subject to the regulations in this Part.

KCR-13 batteries used at Nuclear Plants in 1E applications made in 2005

Utility	Plant Name	Battery Model	Qty of Batteries
Entergy	Indian Point	KCR-13 NUC	72
Xcel Energy	Monticello	KCR-13 NUC	62

(vii) The corrective action which has been, is being, or will be taken; the name of the individual or organization responsible for the action; and the length of time that has been or will be taken to complete the action.

Co-Current Actions underway to complete the evaluation:

- a) On receipt of the final report by LPI/Indian Point by C&D, C&D shall evaluate the findings and the causes for failure. Maximum time 14 days from receipt of the report.
- b) In conjunction with the licensees identified in section vi, C&D will recommend maintenance assessment of all KCR-13 batteries at these locations to determine their status, and specifically the presence of any evidence of potential defects via visual examination. For any cells exhibiting the presence of potential defect, C&D shall further recommend that they be returned for analysis. Estimated completion date of analysis is thirty (30) days from the receipt of the returned batteries.

NRC Interim Report
December 20, 2013
Page 3

(viii) Any advice related to the defect or failure to comply about the facility, activity, or basic component that has been, is being, or will be given to purchasers or licensees.

U.S. Licensees using batteries possibly containing the alleged defect have been notified of the filing of this interim report with recommendations that they examine their batteries for any signs of problems. See attached notification letter.

(ix) In the case of an early site permit, the entities to whom an early site permit was transferred.

Not applicable

If you have any questions or wish to discuss this matter or this report, please contact:

Robert Malley
VP Quality and Process Engineering
rmalley@cdtechno.com
(215) 619-7830

Sincerely,

Christian Rheault
President and Chief Executive Officer
C&D Technologies, Inc.

Attachment – C&D Letter to Users of KCR-13 batteries entitled "Possible Problem - KCR-13", dated 12/20/13

Cc: D. Anderson
J. Miller
R. Malley
S. DiMauro
L. Carson
J. Anderson