

Brian Martin Quality Assurance Manager

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March 27, 2014

VIA REGULAR MAIL: U.S. Nuclear Regulatory Commission Document Control Desk Washington, DC 20555-0001

VIA OVERNIGHT DELIVERY: U.S. Nuclear Regulatory Commission 11555 Rockville Pike Rockville, MD 20852-2746

Subject: Interim Report- 10CFR 21 Evaluation regarding potential deficiencies in testing of PV-62

The purpose of this letter is to provide the NRC a report in general conformity to the requirements of 10CFR 21 Part 21.21 (a)(2).

This report is a result of NRC Inspection Report No. 99901431/2013-201 dated 20 August 2013 and Pentair Corrective Action Report (CAR 675). In general CAR 675 determined that the subject valve (PV-62) was tested at a temperature 25°F higher than the maximum allowable of 125°F by the test procedure without the documentation that an engineering review was conducted to determine impact (if any) that the temperature excursion had on the testing of the valve.

The subject valve (PV-62) of CAR 675 had a formal documented engineering evaluation that the temperature excursion did not have an impact on the testing of the valve. The customer did not have an active reactor.

This report is to inform the NRC of the potential 10CFR 21 evaluation. Pentair Valves and Controls US LP, dba Anderson Greenwood Crosby is notifying the NRC of this potential and the affected licensees of the results of the 10CFR 21 evaluation.

IEI1 IEI9



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

(i) Name and Address of the individual or individuals informing the Commission:

Brian L. Martin Quality Assurance Manager Pentair Valves and Controls US LP, dba Anderson Greenwood Crosby Mansfield Operations 55 Cabot Blvd Mansfield, MA 02048

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

Safety valve PV-62 seismic testing.

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

Pentair Valves and Controls US LP, dba Anderson Greenwood Crosby Mansfield Operations 55 Cabot Blvd Mansfield, MA 02048

(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.

During testing of the PV-62 pressurizer safety valves, Pentair Mansfield failed to evaluate the validity of the test, which was performed at a temperature 25°F higher than the allowable ambient test temperatures, to ensure compliance with the Pentair test procedure (T-161093) procedural requirements. There was concern that testing outside of the temperature range would cause performance issues. There was concern that there was no evaluation of the fact that the test was performed outside of the temperature range.

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

27 June 2013

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.

Tag Serial Number	Serial Number	Site
APP-RCS-PL-V005A	00-0001	Sanmen Unit 1/Haiyang Unit 1
APP-RCS-PL-V005B	00-0002	Sanmen Unit 1/Haiyang Unit 2
APP-RCS-PL-V005A	00-0003	Sanmen Unit 1/Haiyang Unit 3
APP-RCS-PL-V005B	00-0004	Sanmen Unit 1/Haiyang Unit 4
APP-RCS-PL-V005A	00-0005	Sanmen Unit 1/Haiyang Unit 5
APP-RCS-PL-V005B	00-0006	Sanmen Unit 1/Haiyang Unit 6
APP-RCS-PL-V005A	00-0007	Sanmen Unit 1/Haiyang Unit 7
APP-RCS-PL-V005B	00-008	Sanmen Unit 1/Haiyang Unit 8
APP-RCS-PL-V005A	00-0009	Vogtle
APP-RCS-PL-V005B	00-0010	Vogtle
APP-RCS-PL-V005A	00-0011	VC Summer
APP-RCS-PL-V005B	00-0012	VC Summer
APP-RCS-PL-V005A	00-0013	VC Summer
APP-RCS-PL-V005B	00-0014	VC Summer
APP-RCS-PL-V005A	00-0015	VC Summer
APP-RCS-PL-V005B	00-0016	VC Summer
APP-RCS-PL-V005A	00-0001	Sanmen NPP Unit 2
APP-RCS-PL-V005B	00-0002	Sanmen NPP Unit 2
APP-RCS-PL-V005A	00-0001	Haiyang NPP Unit 2
APP-RCS-PL-V005B	00-0002	Haiyang NPP Unit 2

(vi) 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.

A Pentair Corrective Action Report (CAR 675) was created for the nonconformance. Engineering evaluation of the impact of the 25°F over range was that the change in temperature had an insignificant impact on the performance of the valve. Training to emphasize the testing requirements and impact on the test report and performance of the valve will be performed. Additionally, a new Minimal Testing Requirements document will be established that will govern test procedures. This over temperature had no impact on the operation of PV-62, hence PV-62 will operate as designed. There is no 10 CFR 21 reportable.



(vii) 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.

None. PV-62 had no potential of being installed in an active plant. PV-62 was returned to Pentair Mansfield and testing was corrected.

(viii) 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 feel free to contact me.

Sincerely,

Brian L. Martin Quality Assurance Manager