



CB&I  
128 South Tryon Street  
Charlotte, NC 28202  
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www.CBI.com

10 CFR 21.21

April 22, 2014

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

**SUBJECT: UPDATED INTERIM 10 CFR PART 21 REPORT REGARDING CB&I LAKE CHARLES WELDING PROCEDURE SPECIFICATION NONCONFORMANCE FOR AP1000**

The attachment to this letter provides an updated interim report in accordance with 10 CFR 21.21 pertaining to CB&I Lake Charles welding procedure nonconformance with applicable code requirements. CB&I Lake Charles is supplying basic components associated with modular construction for the V. C. Summer Units 2 & 3 and Vogtle Units 3 & 4 nuclear projects. It was discovered that a welding procedure, WPS-1-1-107, was noncompliant with the applicable American Welding Society (AWS) code.

Evaluation of reportability in accordance with 10 CFR Part 21 was not able to be completed within the 60-day evaluation period due to the need to determine the impact and extent of the identified issue. It is currently expected that the evaluation of these conditions will be completed by June 22, 2014, or another updated interim report will be provided by that date.

If you have any questions pertaining to this information, please contact Curtis Castell, Licensing Manager, at 980-321-8314.

Sincerely,

A handwritten signature in black ink, appearing to read 'Don DePierro'.

Don DePierro  
Senior Vice President, Nuclear

cc: Regional Administrator, USNRC, Region II

Attachment

IE19  
MRO

UPDATED INTERIM 10 CFR PART 21 REPORT REGARDING CB&I LAKE CHARLES  
WELDING PROCEDURE SPECIFICATION NONCONFORMANCE FOR AP1000

This report is being provided as an interim report in accordance with 10 CFR 21.21. The previously submitted version of this interim report is provided at the end of this report.

(i) Name and address of the individual or individuals informing the Commission.

Mr. Don DePierro  
CB&I Nuclear  
128 S. Tryon St., Suite 1000  
Charlotte, NC 28202

(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.

No basic components have been determined to fail to comply or contain a defect. This is an interim report. CB&I Lake Charles is supplying basic components associated with modular construction for the V. C. Summer Units 2 & 3 and Vogtle Units 3 & 4 nuclear projects. It was discovered that a CB&I Lake Charles welding procedure specification, WPS-1-1-107, was noncompliant with the applicable American Welding Society (AWS) code.

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

No basic components have been determined to fail to comply or contain a defect. This is an interim report. The nonconformance pertains to one of the procedures used for welding of construction modules for the V. C. Summer Units 2 & 3 and Vogtle Units 3 & 4 nuclear projects. The construction module components are being supplied by CBI Lake Charles, 3191 West Lincoln Rd., Lake Charles, LA 70605.

(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.

No basic components have been determined to fail to comply or contain a defect. This is an interim report.

A taskforce has been created at CB&I Lake Charles to address this issue. This taskforce consists of personnel that have been tested and certified specifically for welding procedure specification (WPS) development by national or international organizations. This taskforce has reviewed WPSs issued for fabrication to determine code compliance. This issue is identified in the CB&I Lake Charles corrective action program as a Level 1 Significant Condition Adverse to Quality. A Root Cause Analysis (RCA) of the condition has been completed and actions are in progress to resolve the identified issues. It is currently expected that sufficient information will be available to complete the Part 21 reportability evaluation of these conditions by June 22, 2014, or another updated interim report will be provided by that date.

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

The discovery date of the deviation is December 23, 2013, based on the date information was received from CB&I Lake Charles regarding this deviation by letter on that date.

(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.

No basic components have been determined to fail to comply or contain a defect. This is an interim report.

(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.

No basic components have been determined to fail to comply or contain a defect. This is an interim report.

A taskforce has been created at CB&I Lake Charles. This taskforce consists of personnel that have been tested and certified specifically for welding procedure specification (WPS) development by national or international organizations. This taskforce has reviewed WPSs issued for fabrication to determine code compliance. This issue is identified in the CB&I Lake Charles corrective action program as a Level 1 Significant Condition Adverse to Quality. A Root Cause Analysis (RCA) of the condition has been completed and actions are in progress to resolve the identified issues.

Twelve (12) procedure qualification records (PQRs) were identified to be performed. Nine (9) of the 12 PQRs have been successfully completed, although review and approval by the purchaser (CB&I Power) is still required. It is currently expected the remaining three (3) PQRs will be completed and the 12 PQRs will be reviewed and approved such that the Part 21 reportability evaluation of these conditions can be completed by June 22, 2014, or another updated interim report will be provided by that date.

(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.

None at this time.

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

Not applicable.



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February 21, 2014

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

**SUBJECT: INTERIM 10 CFR PART 21 REPORT REGARDING CB&I LAKE CHARLES WELDING  
PROCEDURE SPECIFICATION NONCONFORMANCE FOR API000**

The attachment to this letter provides an interim report in accordance with 10 CFR 21.21 pertaining to CB&I Lake Charles welding procedure nonconformance with applicable code requirements. CB&I Lake Charles is supplying basic components associated with modular construction for the V. C. Summer Units 2 & 3 and Vogtle Units 3 & 4 nuclear projects. It was discovered that a welding procedure, WPS-1-1-107, was noncompliant with the applicable American Welding Society (AWS) code.

Evaluation of reportability in accordance with 10 CFR Part 21 was not able to be completed within the 60-day evaluation period due to the need to determine the impact and extent of the identified issue. It is currently expected that the evaluation of these conditions will be completed by April 22, 2014.

If you have any questions pertaining to this information, please contact Curtis Castell, Licensing Manager, at 980-321-8314.

Sincerely,

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Don DePiero  
Senior Vice President, Nuclear

cc: Regional Administrator, USNRC, Region II  
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**INTERIM 10 CFR PART 21 REPORT REGARDING CB&I LAKE CHARLES WELDING  
PROCEDURE SPECIFICATION NONCONFORMANCE FOR AP1000**

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(i) Name and address of the individual or individuals informing the Commission.

Mr. Don DePierro  
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(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.

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A taskforce has been created at CB&I Lake Charles to address this issue. This taskforce consists of personnel that have been tested and certified specifically for welding procedure specification (WPS) development by national or international organizations. This taskforce will review all of the WPSs issued for fabrication to determine code compliance. The essential variable parameters for the various versions of each WPS will be assessed and will be run to support the low and high ends of these WPSs when combined. Evaluation of the joint types and joint configurations used in fabrication will be conducted and it will be determined if additional PQRs are needed to support the WPS. This issue is identified in the CB&I Lake Charles corrective action program as a Level 1 Significant Condition Adverse to Quality. A Root Cause Analysis (RCA) team has been established and will perform a full analysis on the condition. It is currently expected that sufficient information will be available to complete the Part 21 reportability evaluation of these conditions by April 22, 2014.

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

The discovery date of the deviation is December 23, 2013, based on the date information was received from CB&I Lake Charles regarding this deviation by letter on that date.

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