

Brian Martin Quality Assurance Manager

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> Mansfield, MA 02048 www.pentair.com

June 15, 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: Update to Interim Report- 10CFR 21 Evaluation regarding potential deficiencies in Seismic Qualifications for PV-62

Reference Pentair Interim Report 20140615.

The purpose of this letter is to provide updated information as of the current date to the NRC in regards to the subject line and 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 673). In general CAR 673 determined that required seismic testing was improperly performed and delivered to the customer. The subject valve (PV-62) of CAR 673 was returned to Pentair and successfully retested. The customer did not have an active reactor.

The original attached report was to inform the NRC of the potential 10CFR 21 evaluation. Pentair Valves and Controls US LP, dba Anderson Greenwood Crosby notified the NRC of this potential and the affected licensees of the results of the 10CFR 21 evaluation.

The purpose of this letter is to update the status of the evaluations for the identified customers and product from the previous report and follow on actions. 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

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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.

Pentair previously identified 93 test reports that have potential deficiencies in the seismic requirements. We have identified 83 assemblies, from the 93 test reports, and we have completed the process of identifying the potential additional affected valve assemblies.

The following valves have been evaluated and determined to not be a Part 21 reportable issue and are considered to be closed. Pentair Engineering has determined that all requirements have been met and none of the delivered product are of indeterminate quality.

| Test Report | Assembly Number | Customer                          |
|-------------|-----------------|-----------------------------------|
| 5560        | N900132         | Korea Hydro Shin Kori             |
| 5527        | N900010         | Korea Hydro Shin Wolsong          |
| 5520        | N900009         | Korea Hydro Shin Kori             |
| 5528        | N900011         | Korea Hydro Shin Wolsong          |
| 3832        | N60582          | WPPS Units 3 & 5                  |
| 3984        | N61106          | Mill Power Cherokee & Perkins     |
| 3718        | N58737          | Bechtel San Onofre Units 2 & 3    |
| 3719        | N58737          | Bechtel San Onofre Units 2 & 3    |
| 4159        | N66285          | Bechtel Korea Nuclear Units 7 & 8 |
| 5472        | N99890          | Korea Hydro Yonggwang Units 5 &6  |
| 5487        | N99965          | Korea Hydro Kori Unit 1           |
| 5488        | N99965          | Korea Hydro Kori Unit 1           |
| 5488        | N99890          | Korea Hydro Yonggwang Units 5 &6  |
| 5529        | N900048         | Korea Hydro Kori Units 3 & 4      |
| 5530        | N900048         | Korea Hydro Kori Units 3 & 4      |
| 5558        | N900044         | Westinghouse (AP1000)             |
| 5570        | N900091         | State Nuclear Sanmen              |
| 5570        | N900106         | State Nuclear Haiyang NPP Unit 2  |
| 5572        | N900091         | State Nuclear Sanmen              |
| 5572        | N900106         | State Nuclear Haiyang NPP Unit 2  |
| 5591        | N900091         | State Nuclear Sanmen              |
| 5591        | N900106         | State Nuclear Haiyang NPP Unit 2  |
| 5510        | N900044         | Westinghouse (AP1000)             |
| 4050        | N62569          | Georgia Power Bechtel             |
| 3807        | N59180          | Under Review                      |
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| 4175 | N66089       | Ontario Hydro Darlington Generating Station A                        |
| 5030 | N82749       | Korea Electric Ulchin Units 3 & 4                                    |
| 5556 | N900028      | Westinghouse (AP1000)  |
| 5509 | N900028      | Westinghouse (AP1000)  |
| 5419 | N97793       | Korea Electric Ulchin Units 5 & 6                                    |
| 5518 | N99825       | Korea Hydro Shin Wolsong Units 1 & 2                                 |
| 5498 | N99824       | Korea Hydro Shin Kori Units 1 & 2, Korea Electric Ulchin Units 5 & 6 |
| 5498 | N97793       | Korea Hydro Shin Kori Units 1 & 2, Korea Electric Ulchin Units 5 & 6 |
| 3748 | N59283       | Taiwan Power Kyosheng Plant Units 1 & 2                              |
| 3750 | N59283       | Taiwan Power Kyosheng Plant Units 1 & 2                              |
| 3754 | B59283       | Taiwan Power Kyosheng Plant Units 1 & 2                              |
| 3899 | N59283       | Taiwan Power Kyosheng Plant Units 1 & 2                              |
| 4051 | N59283       | Taiwan Power Kyosheng Plant Units 1 & 2                              |
| 5244 | Under Review | Under Review   |
| 5400 | Under Review | Under Review   |
| 5497 | N99751       | Korea Hydro Shin Kori Units 1 & 2                                    |
| 5515 | N99798       | Korea Hydro Shin Wolsong Units 1 & 2                                 |
| 4506 | N73760       | PWRPP  |
| 4506 | N73762       | PWRPP  |
| 4508 | N73763       | PWRPP  |
| 4049 | N61187       | Bechtel Public Service Hope Creek Units 1 & 2                        |
| 3892 | N59276       | Taiwan Power Kyosheng Plant Units 1 & 2                              |
| 4533 | N73776       | Weir Pump, Sizewell B Power Station                                  |
| 3841 | N61843       | Carolina Power and Light, Shearon Harris Station                     |
| 3860 | N44417       | Under Review   |
| 4048 | N61190       | Bechtel Public Service Hope Creek Units 1 & 2                        |
| 3850 | N61843       | Carolina Power and Light, Shearon Harris Station                     |
| 3875 | Under Review | Under Review   |
| 3749 | N59277       | Taiwan Power Kyosheng Plant Units 1 & 2                              |
| 3798 | N59149       | Ebasco Florida Power & Light St. Lucie Unit 2                        |
| 3819 | N59148       | Ebasco Florida Power & Light St. Lucie Unit 2                        |
| 3839 | N60908       | Bechtel Public Service Hope Creek Units 1 & 2                        |
| 3860 | N44417       | Carolina Power and Light, Shearon Harris Station                     |
| 3893 | N59280       | Taiwan Power Kyosheng Plant Units 1 & 2                              |
| 3895 | N59286       | Taiwan Power Kyosheng Plant Units 1 & 2                              |
| 3896 | N60067       | Taiwan Power Kyosheng Plant Units 1 & 2                              |
| 3898 | N59277       | Taiwan Power Kyosheng Plant Units 1 & 2                              |
| 4509 | N73464       | PWRPP, Sizewell B Power Station                                      |
| 3747 | N59284       | Taiwan Power Kyosheng Plant Units 1 & 2                              |
| 3900 | N59284       | Taiwan Power Kyosheng Plant Units 1 & 2                              |
| 4190 | N67438       | Bechtel Public Service Hope Creek Units 1 & 2                        |
| 3723 | N60239       | Southern California Edison San Onofre Units 2 & 3                    |
| 3840 | N59150       | Ebasco Florida Power & Light St. Lucie Unit 2                        |
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| 3874 | N60905       | Bechtel Public Service Hope Creek Units 1 & 2        |
| 5244 | Under Review | Under Review   |
| 3842 | N60912       | Bechtel Public Service Hope Creek Units 1 & 2        |
| 3894 | N59281       | Taiwan Power Kyosheng Plant Units 1 & 2              |
| 3897 | N59287       | Taiwan Power Kyosheng Plant Units 1 & 2              |
| 4510 | N73765       | PWRPP, Sizewell B Power Station                      |
| 3879 | N61188       | Bechtel Public Service Hope Creek Units 1 & 2        |
| 3904 | N63185       | Ebasco Florida Power & Light St. Lucie Unit 2        |
| 3922 | N64023       | Ebasco Florida Power & Light St. Lucie Unit 2        |
| 4507 | N73761       | PWRPP, Sizewell B Power Station                      |
| 5489 | Under Review | Under Review   |
| 5490 | Under Review | Under Review   |
| 5588 | Under Review | Under Review   |
| 5605 | Under Review | Under Review   |
| 5607 | Under Review | Under Review   |
| 5611 | Under Review | Under Review   |
| 5612 | Under Review | Under Review   |
| 5615 | Under Review | Under Review   |
| 5618 | Under Review | Under Review   |
| 3887 | N62933       | Pennsylvania Power and Light Susquehanna Units 1 & 2 |
| 3887 | N62934       | Pennsylvania Power and Light Susquehanna Units 1 & 2 |
| 3901 | N59288       | Taiwan Power Kyosheng Plant Units 1 & 2              |
| 3902 | N60518       | Taiwan Power Kyosheng Plant Units 1 & 2              |
| 4179 | N60901       | Bechtel Public Service Hope Creek Units 1 & 2        |
| 4200 | N67795       | Pennsylvania Power and Light Susquehanna             |
| 4201 | N66295       | Bechtel Korea Electric Korea Nuclear Units 7 & 8     |
| 4271 | N65602       | Peerless, Washington Public Power, Unit 1            |
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The following valves have been evaluated and determined that Pentair Engineering cannot determine if the quality requirements have been met. Pentair has determined that while there is little risk to the valve not performing as designed, there is not positive documentation that the valves were tested correctly. Pentair has determined that the only correct method to determine the quality is to test the valve in both directions, thereby eliminating the uncertainty of testing in the weakest axis.

To this end, Pentair has ordered a test valve and will test the valve using the correct procedure. The test is scheduled to be completed by the end of August 2014.



The valves affected are listed below:

N98342-00-0001 through -0009 (Hanjung- Shin Ulchin 5&6) N900008-00-0001 through -0008 (Doosan – Shin Kori 1&2) N900010-00-0001 through -0008(Doosan – Shin Wolson 1&2)

Pentair Mansfield formally requests an extension to complete the above mentioned testing until August 31, 2014.

(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.

In evaluating Pentair Correction Action Report (CAR 673) an extent of conditions required an evaluation of all test reports that required a static seismic load test in the least rigid axis.

The testing of valves in the incorrect axis has the potential for indeterminate functionality of the valves during a seismic event.

Pentair Mansfield has completed the review of the total population. As a result of the review, 25 valves (same model) shipped to three customers as listed in section (ii) have indeterminate quality. Pentair will be assembling and testing an identical valve to determine whether the valves delivered are reportable. The anticipated completion date is 31 August 2014.

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

20 August 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.

To date Pentair has identified all affected valves. See section (ii)



(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.

Pentair Mansfield has completed the investigation. As a result, with the exception of the noted valves, Pentair has determined that while there is little risk to the valves not performing as designed, there is not positive documentation that the valves were tested correctly. Pentair has determined that the only correct method to determine the quality is to test the valve in both directions, thereby eliminating the uncertainty of testing in the weakest axis.

To this end, Pentair has ordered a test valve and will test the valve using the correct procedure. The test is scheduled to be completed by 31 August 2014.

N98342-00-0001 through -0009 (Hanjung- Shin Ulchin 5&6) N900008-00-0001 through -0008 (Doosan – Shin Kori 1&2) N900010-00-0001 through -0008(Doosan – Shin Wolson 1&2)

(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.

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

Michael J. Rider Engineering Manager