

Don DePierro Senior Vice President, Nuclear Division Power

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> > 10 CFR 21.21

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October 15, 2014

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

SUBJECT: INTERIM 10 CFR PART 21 REPORT REGARDING DEVIATIONS OF COATINGS FOR PIPE SUPPORTS FOR AP1000® PROJECTS

The attachment to this letter provides an interim report in accordance with 10 CFR 21.21 pertaining to the identification of deviations associated with coatings on pipe supports being supplied for the V. C. Ser Summer and Vogtle AP1000® nuclear projects. The deviations being evaluated are associated with the use of an incorrect coating type for recently procured pipe supports.

Evaluation for reportability in accordance with 10 CFR Part 21 was not able to be completed within the 60-day evaluation period due the failure to properly identify and track this condition. The failure to properly identify and track this condition has been identified in the CB&I Power Corrective Action Program. It is expected that the evaluation for reportability will be completed by December 12, 2014.

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

Sincerely,

Don DePierro Senior Vice President, Nuclear

cc: Regional Administrator, USNRC, Region II

Attachment

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INTERIM 10 CFR PART 21 REPORT REGARDING DEVIATIONS OF COATINGS FOR PIPE SUPPORTS FOR AP1000® PROJECTS

This report is being provided as an interim report in accordance with 10 CFR 21.21.

(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. The deviations being evaluated are associated with the use of incorrect coatings for pipe supports intended to be used for the V. C. Summer and Vogtle AP1000® nuclear projects.

(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 deviations being evaluated are associated with the use of incorrect coatings for pipe supports intended to be used for the V. C. Summer and Vogtle AP1000® nuclear projects. The affected piping supports are being supplied by LISEGA Inc. USA, 370 East Dumplin Valley Rd., Kodak, TN 37764. Note that LISEGA supplied the pipe supports with coating material as specified in the purchasing documents. Subsequent review has determined that the purchasing documents specified incorrect information for many of the supports, which should have been coated with a different material.

(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. The deviations being evaluated are associated with the use of incorrect coatings for pipe supports intended to be used for the V. C. Summer and Vogtle AP1000® nuclear projects.

It is currently expected that the evaluation of these conditions will be completed by December 12, 2014.

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

The discovery date of these deviations is based on the date of the associated CB&I Power Corrective Action Report (CAR). That CAR was initiated on March 10, 2014. Due to a processing error the March 10, 2014, CAR was not properly identified and tracked for Part 21 reportability evaluation. The failure to properly identify and track this condition has been identified in the CB&I Power Corrective Action Program.

(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. The deviations being evaluated are associated with the use of incorrect coatings for pipe supports intended to be used for the V. C. Summer and Vogtle AP1000® nuclear projects. An estimated 2,909 pipe supports are currently considered to have the incorrect coating. The nonconforming pipe supports were initially placed into a "hold" status and are now in the process of being prepared for return to the supplier to be corrected. The pipe supports are associated with piping systems inside containment.

(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. The deviations being evaluated are associated with the use of incorrect coatings for pipe supports intended to be used for the V. C. Summer and Vogtle AP1000® nuclear projects. Actions are in progress to complete the 10 CFR Part 21 evaluation. Additionally, the pipe support coatings are being corrected, as necessary.

It is currently expected that the evaluation of these conditions will be completed by December 12, 2014.

(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.

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

(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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