



July 18, 2016

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

Subject: Request for Additional Extension to Resolve Customer Comments of the Failure Analysis Report

Reference: Potential Part 21 on Safety Clip, Siemens Part Number 401-158

Dear Sirs,

National Technical Systems (NTS) recently submitted a request for extension to perform additional testing and complete a failure analysis of the Siemens safety clip. NTS completed the additional testing and failure analysis report on June 2, 2016 and submitted the draft report for customer comments. NTS received these comments on June 30, 2016 and now requests an additional extension of sixty (60) days to resolve all comments.

Following is the original report detailing the Potential Part 21 notice:

Pursuant to the requirements of 10CFR Part 21, this letter notifies the NRC of a potential Part 21 condition. The subject Safety Clip is used in commercial grade item medium voltage circuit breakers. The subject circuit breakers are manufactured by Siemens Industry Inc. and are dedicated for use as a Basic Component by National Technical Systems (NTS). Affected circuit breakers are Siemens type 3AF 350 MVA. The safety clip in question is made of a black finish steel and retains the Close Pawl Roller.

During an inspection at Wolf Creek Nuclear Operating Company, it was shown that the subject safety clips were cracked, broken, missing, or degraded after 600 to 850 operations. If the safety clip breaks and falls off and the washers and roller pawl outside bearing and race fall off, then future circuit breaker close operations beyond the next close cycle may not be assured.

National Technical Systems has provided the Siemens Type 3AF 350 MVA circuit breakers to WCNO, PSEG Nuclear LLC Salem, and Entergy ANO. NTS will contact each utility and recommend that the safety clip part number 401-158 be inspected and replaced with safety clip part number 40115. This safety clip is a yellow zinc plated safety clip of different design, and no known problems exist with this safety clip on different type Siemens circuit breakers dedicated by NTS.

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Thank you for your consideration in this matter and if you have any questions, please contact NTS' Senior Director of Nuclear Engineering and Test Services, Tom Brewington at (256) 716-4512 or email at tom.brewington@nts.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Megan Toomey". The signature is written in a cursive style and is positioned above the typed name.

Megan Toomey
Sr. Contracts Manager
NTS Huntsville