



LAKE ENGINEERING CO.

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July 25, 2018

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

Subject: Interim Notification per 10 CFR Part 21
Degraded Snubber SF1154 Hydraulic Fluid Batch No. 11KLVS146

On May 18, 2012 Lake Engineering Company (LEC) received a 55 gallon drum of SF1154 snubber fluid from Batch No. 11KLVS146 that was manufactured in 2011. Fluid from this drum was subsequently shipped to various customers in five gallon and one gallon containers.

On June 13, 2018 Lake Engineering Company was notified by Duane Arnold Station that, while filling a snubber in the snubber shop, soft solid material in the form of white flakes was observed in a one gallon container of fluid from the above batch. The material was reported to be similar to that observed by DAEC personnel in 2006 in SF1154 Batch No. AD965. DAEC subsequently reported the Batch AD965 anomaly in accordance with Part 21 requirements (Ref. ML070300154).

A similar anomaly was identified in March 2017 in SF1154 Batch No 14ELVS145 that was manufactured in 2014. That anomaly was reported to the NRC by Lake Engineering Company on May 1, 2017 (Ref. ML17128A465) and was subsequently determined to not present a substantial safety hazard at the plants at which the fluid was used.

Within 60 days following the date of this notification, Lake Engineering Company shall submit a final report or a second interim report documenting the results to date of our evaluation to determine whether the anomaly associated with Batch 11KLVS146 represents a defect which could create a substantial safety hazard at the plants at which the fluid was used.

Momentive Performance Materials, the fluid manufacturer, has determined that above described solid material is a cyclic siloxane byproduct that normally exists in solution in SF1154. The apparently high concentration of the byproduct in the above batches resulted in its partial precipitation in solid form. Momentive has since implemented a process that reduces the byproduct to an undetectable level. This process shall hereafter be applied to all SF1154 fluid provided by Momentive.

If there are any questions or if additional information is required, please contact the writer by mail or by phone using the contact information provided above or by email at dbrown@lakeengineeringri.com.

Very truly yours,

LAKE ENGINEERING COMPANY

D. P. Brown, P.E.
President

IE19
NRR

DPB/d/let072518.nrc
cc: P. Guay - QA Mgr.