



Interim Notification Per 10CFR21

31 May 2019

United States Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Ultra Electronics

Energy
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Dear Sir or Madam:

The NRC performed a Design Basis Assurance Equipment Qualification Inspection at SQN (Exit Report 50-327, 328/2019-001), raising a Green Non-Cited Violation on the basis that:

- 10CFR50.49 (e) (5) states that *'...Equipment qualified by test must be preconditioned by natural or artificial (accelerated) aging to its end-of-installed life condition. Consideration must be given to all significant types of degradation which can have an effect on the functional capability of the equipment'*
- The Qualified service Life (QL) calculations for Foxboro Weed N-E11 & N-E13 Series transmitters installed at SQN did not take account of internal Heat Rise (HR) when the transmitters were energised in addition to ambient temperature.

The operator has accepted the violation and informed Ultra. We have treated this as a potential deviation from regulatory requirements and initiated a safety investigation on 3rd April 2019. We are currently unable to conclude the investigation on or before 3rd June 2019 in accordance with 10CFR21.21(a)(2). Thus, we are writing to provide an interim report:

- Our engineering team is in active dialogue with the SQN engineering team and has conducted interim HR calculations for the Foxboro Weed N-E11 & N-E13 Series transmitters.
- These calculations are currently under review; we are seeking to ensure that we have considered all relevant effects in the calculation.
- The NRC has raised an issue that is potentially quite general. We have contacted NRC for guidance, and are considering what the full extent of condition is.

We believe that the investigation will be completed by 3rd August 2019, however given the general and complex nature of the issues this may be subject to revision.

Best Regards

Gary. M. Hawkins
Vice President Engineering

IE19
NRR