

5D-327/328

Update to ML19155A084 10CFR21 Interim Report 26 July 2019

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

Energy 707 Jeffrey Way PO Box 300 Round Rock, TX 78680-0300 Tel +1 512 434 2800 Fax +1 512 434 2801

Dear Sir or Madam:

We have previously communicated an interim 10CFR21 report NRC reference ML19155A084, which we now wish to update as a result of the investigatory work performed:

- There have been two fruitful discussions with the NRC on the regulatory and technical implications of this investigation and we would like to thank the NRC staff concerned for their assistance.
- We have examined the original qualification experiments and the activation energy values used to ensure they provide valid inputs to the mathematical models.
- We have refined the mathematical models used to determine qualified service lives from accelerated thermal ageing data for the Foxboro Weed N-E11 & N-E13 Series transmitters, and other devices within the extent of the condition, to better reflect the impact of component selfheating.
- The impact on qualified service life of the revised mathematical models is modest for typical plant conditions, and we do not therefore believe that it poses a significant risk to nuclear safety.

We will shortly be contacting the licensees operating devices within the extent of the condition in order to provide them with a packaged software tool that will allow them to determine the impact of this issue for their specific plant conditions.

We have revised the completion date for the investigation from 3rd August 2019 to 17th September 2019 because of the complex nature of the investigation and we are confident of closure by this revised date.

Best Regards

Gary. M. Hawkins

Vice President Engineering

IE19 NRR

