

July 1, 2022

Flow Control Division Anchor/Darling Valves BW/IP Valves Edward Valves Valtek Control Products Worcester Valves

US Nuclear Regulatory Commission Document Control Desk 11545 Rockville Pike Rockville, MD 20852-2746

Subject: Solenoid Coil Failure of Model 38878-8 Solenoid Valve at Catawba Nuclear Station for use on FWIV Actuator

Attachment 1 – As-Found Inspection Report Attachment 2 – Ohmega Failure Analysis Report Attachment 3 – Shipment Data

This letter is to notify the US Nuclear Regulatory Commission that, in accordance with the provisions of 10CFR Part 21, we have concluded our assessment and are reporting the results below.

Description:

On February 2, 2022, Flowserve was informed by Duke Energy that a Model 38878-8 solenoid valve installed on a feed water isolation valve actuator failed a routine coil resistance test due to low resistance at the customer site. The solenoid valve was returned to Flowserve for evaluation.

Evaluation:

Flowserve received the solenoid valve and completed an initial inspection (See Attachment 1). Flowserve found there to be no apparent external damage and noted that the tamper-indicating fastener paint was not broken indicating that the solenoid valve had not been disassembled. Flowserve tested the resistance across the coil and confirmed the condition as described by the customer. The coil resistance measured 26.7 Ohms. The required resistance is 290-320 Ohms per Flowserve's internal specification and 175-500 Ohms per Duke Energy's internal procedure. As no root cause of failure was evident after initial inspection and testing of the solenoid valve assembly and coil, Flowserve returned the coil to the original equipment manufacturer, Ohmega Coil, for inspection to determine if a manufacturing defect is potentially the reason for failure.

Upon receipt of the coil, Ohmega verified the condition and found the low resistance condition to be as described at 26.65 Ohms at 68 degrees F. Ohmega noted that there were no defects on the outer molded surface. The coil was machined back to expose the magnet wire. The lead wire solder joints were inspected and found to be properly attached and insulated. Due to the unit being molded in epoxy, it was not possible for Ohmega to inspect the coil in stages to fully evaluate the magnet wire.

Flowserve U S Inc Flow Control Division

Ralaigh Operations PO Box 1961 1900 South Saunders Street Raleigh, NC 27603
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Following the investigation by the coil manufacturer, Ohmega, it was determined that the lead wires and solder joints were not the cause of failure. Per the manufacturer's failure analysis report, the exact cause of failure could not be determined. Ohmega states that a possible cause for the failure is a small nick in the magnet wire insulation that over time caused the coil to short out (See Attachment 2 for Ohmega Failure Analysis Report).

Flowserve notes that an overvoltage condition could also cause a similar failure but no obvious evidence of an overvoltage condition (discoloration, damage to housing, obvious fused conducting material, etc.) was found during inspection.

The subject Coil (Part number 04103969DEDCATD) has been shipped from Flowserve at least 273 times with the subject issue being the only known failure recorded to date (See Attachment 3). Before shipping, each coil is tested at Flowserve for both operability and resistance. During this process, each coil is cycled approximately 150 times for a total duration of approximately 750 seconds to verify the coil is satisfactory before delivery to the customer.

Extent of Condition:

Because the coil windings are self-contained and can move very little within the housing, the probability of a coil enduring 150 cycles, passing all electrical and functional tests, and subsequently failing in service is very low. In this case, this low probability outcome occurred, based on the findings of the investigation. However, Flowserve does not believe that this isolated incident is indicative of an issue with the manufacturing or testing methods of the coil and does not believe that this issue affects other coils in service based on historical reliability and the failure mode.

Corrective Actions:

Though the exact cause of the failure could not be determined within the magnet wire, Ohmega suggests a possible manufacturing improvement of winding the coil with a varnish to provide extra insulation of the magnet wire.

Additionally, Flowserve suggests that plant operators using these solenoid coils measure the resistance of the coil periodically, especially after the coil has been energized for testing or service.

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Summation:

In summary, the Model 38878-8 solenoid valve failed a routine coil resistance test at Catawba Nuclear Station while installed on a feed water isolation valve actuator. The solenoid valve was returned to Flowserve where the low resistance was confirmed. The solenoid coil was then sent to the OEM for further evaluation.

The OEM (Ohmega) completed their analysis and found the reason for failure to be associated with the magnet wire, but the exact point of failure could not be located due to the construction of the coll.

Additionally, Flowserve compiled shipment data for the subject coil and found there to be at least 273 instances where the part was shipped to customers. Of those 273+, this case is the only known instance of a failure associated with the coil.

Due to the rigorous functional testing and the historical reliability of the coil in the field, Flowserve does not believe this incident is indicative of an issue with the manufacturing or testing of the coil and concludes that this issue does not affect other coils currently in service.

Ohmega suggests a possible manufacturing improvement of winding the coil with a varnish to provide extra insulation of the magnet wire.

Flowserve suggests that plant operators using these solenoid coils measure the resistance of the coil periodically, especially after the coil has been energized for testing or service.

Respectfully Submitted,

Sincerely,

Madder 0586037690461

Matt Hobbs, PE Engineering Manager Office: (919) 334-7127 mhobbs@flowserve.com Sincerely,

—DocuSigned by: LaTisha Brodie —81E011ABE1EA422...

LaTisha Brodie QA Supervisor Office: (919) 334-7113 latwilliams@flowserve.com Sincerely,

DocuStaned by: Hylton Kipe 8968E52703D5476...

Hylton Kipe Director, Plant Manager Raleigh Operations Office: (931) 432-4021 hkipe@flowserve.com

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Attachment 1 – As-Found Inspection Report



Flow Control Division Anchor/Darling Valves BW/IP Valves Edward Valves Valtek Control Products Worcester Valves

March 3, 2022

As Found Inspection Report for Returned Valve

Order Information:

Sales Order Number: 135833 (RMA #11477) Customer: Duke Energy Carolinas, LLC Purchase Order Number: N/A

Scope:

The order consists or QTY 1 Solenoid Valve, Model 38878-8, Serial Number BR-332.

The subject valve was returned on Flowserve Sales Order 135833 for a failure mode analysis to be performed on the solenoid coil originally supplied on 124353, Line Item 001. The valves were returned to Flowserve for evaluation due to low resistance readings across the solenoid coil. Below are the results of the as-found condition.

Inspection Results

The solenoid was received with no apparent external damage. The tamper-indicating fastener paint was not broken indicating that coil housing had never been removed and the internal components had not been manipulated (See Attachment 1, Images 1 and 2). Resistance measurements across the solenoid coil leads resulted in a value of 26.7 Ohms (See Attachment 1, Image 3). This is consistent with the measurements obtained by Duke Energy. After the initial value was recorded, the wire was manipulated with the multimeter leads still connected. The resistance did not fluctuate, indicating that issue most is most likely in the coil itself.

Research revealed that the subject valve was sent for refurbishment/repair in 2018 during an outage under normal process for QA-1 Borg Warner Solenoid Valves. Refurbishment was performed under Flowserve Sales Order 124353 in early 2019. During refurbishment, the solenoid coil was replaced and tested. Post-refurbishment testing results show that coil resistance was measured to be 296 Ohms during functional testing before shipment (See Attachment 2, Step 6.6.1) and was within specification. Flowserve also confirmed that the original dedication of the solenoid coil itself was satisfactory. The heat number for the solenoid coil on the failed unit is CMT941. See Attachment 3 for dedication results of solenoid coils under this heat number. Note that all were satisfactory.

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Conclusion

Flowserve recommends disassembly of the solenoid valve to further investigate the cause of coil failure.

Jake Buske Product Engineer Flowserve Corp, Flow Control Division 1900 S. Saunders St. Raleigh, NC 27603

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Image 2 - Tamper-Indicating Fastener Paint (2)

Image 3 – Multimeter Reading



Attachment 2 - Functional Test Results for BR332 As-supplied condition on RMA 10958 (Flowserve Sales Order 124353-001)

Raleigh, NC MET

METHOD SPECIFICATION

TITLE: FUNCTIONAL TEST PROCEDURE FOR 38878 SOLENOID VALVES

MS : 9792

Exhibit III

Original Date: 5/04/2016 Revision Date: -

Flowser	ve Corporation Te Sh	Rev 0					
Custom	er: Dake		<u>x</u>	Shop Order: 124353 W/0 5653 38			
Tested	^{By:} 3883	Ass	y S/N: BR	332	Part	Vo. :	38878- 8
Date:	2-7-19		Limits		Record Value		By:
Para.	Description	U/M	Min	Max	+		Date:
6.1.5	PROOF TEST <u>Limits:</u> No external leakage or deformation			Zero	ZERO		
6.2.4.3	STROKE ADJUSTMENT Limits: Gap setting on -1, -2, -4, -5, and -6, -7, -8 assemblies	Inches	0.0025	0.0035	1002	د ې	
6.2.4.6	STROKE ADJUSTMENT Limits: Gap setting on -3 assemblies	Inches	0.018	0.02	NA		
	PULL-IN VOLTAGE ADJUSTMENT On -1, -5, -7, -8 Assemblies Limits: (Ref. Para. 6.3,2,5) Leakage: 1 Drop/10 Minutes	Drop/10 Minutes		1	1		· · · ·
	<u>Limits:</u> (Ref. Para. 6.3.2.6) Leakage: 1 Drop/1 Minute @ 90 +/- 1 VDC	Drop/10 Minutes		1		·	
	Limits: (Ref. Pare. 6.3.2.8) Steady-State current: .37 to .45 amperes	AMPS	0.37	0.45	0.40		

Form #36-Q-1365



METHOD SPECIFICATION

Exhibit []]

FUNCTIONAL TEST PROCEDURE FOR 38878 SOLENOID VALVES

MS: 9792

Original Date: 5/04/2016 Revision Date: -

TITLE:

Flowserve Test Summary Sheet				Rev 0				
	Customer: Du KE				Shop Order: 124353 W 0 565338			
Tested	2-26 /	Ass'y	S/N: BE:	332	Part No	. 38878-8		
Date:	2-7-19	·	Limits	i	Record Value	By:		
Para.	Description	U/M	Min	Max	7	Date;		
6,3,3,5	For -2 & -6 Assemblies <u>Limits</u> (Ref. Para. 6.3.2.5) 1 drop/10 minutes	Drop/10 Minutes		1	NA			
	Limits (Ref. Para. 6.3.2.6) Leakage: 1 Drop/1 Minute @ 90 +/- 1 VDC	Drop/10 Minutes		1	N17			
	<u>Limits</u> (Ref. Para. 6.3.2.8) Steady-State current: .37 to .45 amperes.	AMPS	0,37	0.45	NA			
6.3,4	For -3 Assemblies Limits: (Ref. Para. 6.3.4.5) Leakage: 1CC/10 minutes	CC/Min.			NA			
	<u>Limits:</u> (Ref. Para. 6.3,4,6) Steady-State current: .37 to ,45 amperes,	AMPS	0.37	0,45	NA			
6.3,5	For -4 Assemblies Linits (Ref. Para, 6.3.5.4) Leakage: 1CC/10 Minutes @ 90 +/- 1 VDC	AMPS	0.37	0.45	NA			

Form #36-Q-1365

Functional Test Results for BR332 Following Refurbishmer 3 of



METHOD SPECIFICATION

Exhibit III

FUNCTIONAL TEST PROCEDURE FOR 38878 SOLENOID VALVES

MS : 9792

Original Date: 5/04/2016 Revision Date: -

TITLE:

Flowse	erve	Test Summar	. Chaot		·		
Corpo	ration		y oneet	Rev. 0			
Custor	- PARE			Shop C	 ج_		
Testec	1By: 3883	Ass'y	S/N: BRI	332) <u>/ a 56535.</u> Part No.	38878-8-	
Date:	2-7-19		Limits		Record Value	By:	
Para.	Description	Ú/M	Min	Max	-	Date:	
6.3.5	(Continued) Limits (Ref. Para. 6.3.2.8) Steady-State curre .37 to .45 Amperes	nt:	0.37	0.45	NA	Date.	
6.4	External Leakage T Limits: No external leakag allowed	e ·		ZERÖ	2ERO		
6.5	Swab Fluid From V Cavity & Coil Hous	ing	CHECK	ননত			
6.5.1	Apply Loctite TL 29		CHECK	OFF			
6,5.2	Set Screw Tolerand Limits: -3: .018 to .020 in Others: .0025 to .00		+		10025		
8.5.3	Tamper Proof Pain	t	CHECK	OFF		+	
6.5,4	All Assemblies Ton End Cap	que FT- L8S	20	25	20		
6.6.1	<u>Coll Resistance Te</u> <u>Limits:</u> 290 to 320 OHMS.	<u>st</u> OHMS	290	320	296		
6.7.1	Insulation Resistan Test Limits: There shall be no breakdown or arcin						

Form #36-Q-1365

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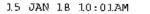
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TITLE: FUNCTIONAL TEST PROCEDURE FOR 38878 Exhibit III SOLENOID VALVES					
MS : 9	792 Original (Date: 5/04/2016 <u>A 55 Y 5/W</u>	Revision Br33	n Date: -	0 / 27353) / 0 545338
Para.	Tested By: 3987				By: Date:
7.0	Marking: (For New Assemblies) Vibro-Etch: 1) Flowserve P/N 38878- on valve body 2) S/N on valve body flange	Check	Off	/	
8.0	<u>Cleaning and Packaging</u>	Check	Off		

Form #36-Q-1365

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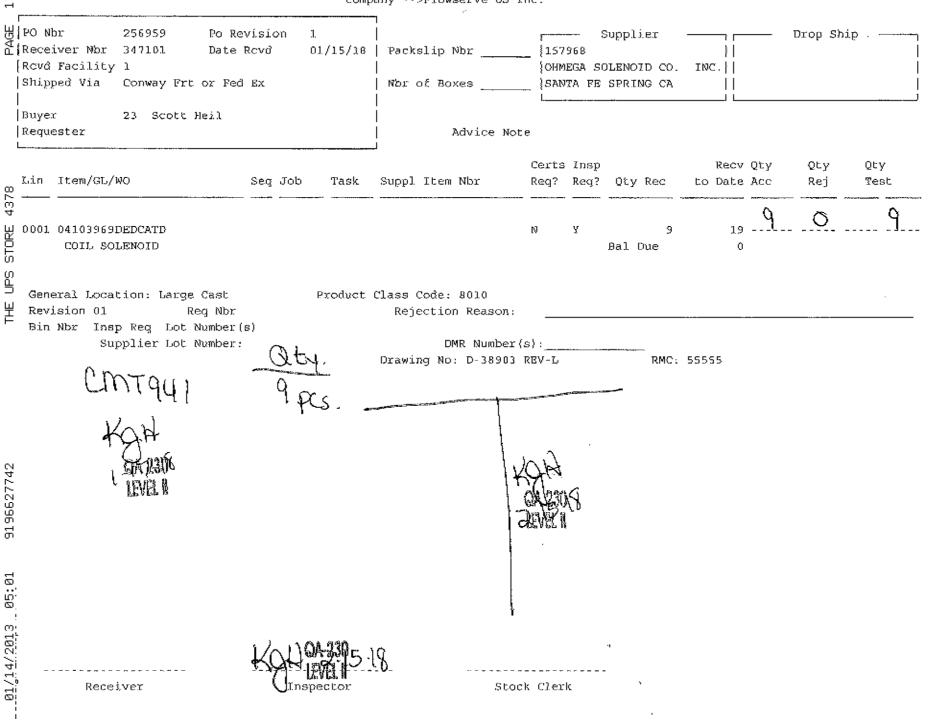


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Receiving Document Avante 9.7.5c Flowserve Raleigh NC Production

Company -->Flowserve US Inc.



Flowserve Raleigh	10CFR21	DEDICATION OF COM	MERCIAL GRADE ITEMS			
Part Name: SOLENOID COIL OHMEGA		Pari	Number: 04103969DEDCATD			
Revision: 2 By: Sizemore, And	/ Date: <u>6//</u>	20/2014 Code Nu	mber(s): <u>CMT941</u>			
RMC Number: 55555	Drawing N	umber(s): <u>38903</u>				
Technical Evaluation Number: RTE-0015		PDF00020				
Flowserve P.O. F.O./R.R. Number: 2569	59-001/ Recv.# 3	47101 Vendor: Of	hmega Solenoid <u>Co.</u>			
Quantity Received: <u>9 pcs.</u> Da	ie: 01-17-2018		Method: <u>1</u>			
Verification Attrib	utes (Quantity Sam	pled: 9 pcs.)			
Attribute F	Required	Actual Measuremen	nt Inspector			
OHMEGA # 38903						
PER DRAWING						
Comments: SEE COMMENTS UNDER D APPLICABLE	IMENSIONAL CRI	TERIA FOR MATERIAL	VERIFICATION IF			
VERIFY _EADWIRE IS 14 G	AGE WIRE	FUNCTIO	NAL TEST PER PDF00020			
Special Order Requirements: Dimensions:		R.C.A.	2-15-18			
OD- 2.255/2.315		202 2 207 2 207 2 2	707 2 207 2 207 2 207			
Overall Length- 4.00/4.06		302, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.307, 2.	307, 2.307, 2.307, 2.307 6, 4, 05, 4, 05			
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Measuring and Test Equipment Serial #s:	Q1B-369. Q1B-188	8, QT2-AD/V-108, Tape				
Verify that Counterfeit and Fraudulent Part	/Material Checks H	ave Been Performed:	04 24.15.18			
Inspector Karen Q. Stacto		Date:	(12-15-16-1			
QA Signature:		<u>LEVELII</u> Date:	2-15-18			
Methods: 1. Special tests and inspect	ions // 3,	Source verification of the	e material			
			,			

2. Commercial grade survey of supplier 4. Acceptable supplier/item performance record

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PDFC	00020	INITIAL	DATE
SEE	DRAWING 38903, NOTE 15		
RES!	ISTANCE TEST		
1)	VERIFY DC RESISTANCE TO BE 290-320 OHMS AT AN AMBIENT TEMPERATURE OF $70^{\circ} \pm 10^{\circ}F$.	CAC	<u>2 45</u>
DIEL	LECTRIC TEST		
2)	USING A HYPOT TESTER, APPLY 1450-1500 VAC, 60 HZ, SINGLE PHASE, BETWEEN BOTH LEAD WIRES AND BODY OF SOLENOID FOR (1) ONE MINUTE.	RAC	<u>2-75</u>
	LIMITS: THERE SHALL BE NO BREAKDOWN OR ARCING.		
vot	TAGE EXCITIATION (CURRENT LIMIT) TEST		
3)	APPLY A VOLTAGE OF 140±5 VDC FOR 20 CYCLES, (A COUPLE OF SECONDS PER CYCLE)	0 <u>4</u> 4	<u>z -15</u>
	LIMITS: CURRENT SHALL NOT EXCEED 0.5 AMPERES.		
RESI	ISTANCE TEST	·	
4)	REVERIFICATION OF RESISTANCE AFTER COIL COOL OFF, ABOVE.	<u>XAC</u>	2-15

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OHMEGA SOLENOID CO., INC. Solenoids - transformers - molded coils	IMVOICE NO.	
10912 So. Painter Ave. = P.O, Box 2747 Santa Fe Springs, California 90670 (562) 944-7948 • FAX: (562) 941-1981	× Packing List	PL-45641

BILL TO:

SHIP TO:

Flowserve	Flowserve			
Flow Control Division - Raleigh Operations	Flow Control Division - Releig			
1900 S. Saunders Street	1900 S. Seunders Street			
Raleigh, NC 27603	Raleigh, NC 27603			

DATE SHIP VI	A	TERMS
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256959 1		13525
QUANTITY	PART NUMBER/DESCRIPTION	UNIT PRICE EXTENDED PRICE

9 / 38903 REV L COIL ITEM #0001 P/N 04103969DEDCATD /

COUNTRY OF ORIGIN: USA -

WE HEREBY CERTIFY THE MATERIAL MENTIONED ON THIS SHIPPER CONFORMS TO ALL PURPOSES TO APPLICABLE SPECIFICATIONS AND/OR STANDARDS. COMPLETE PHYSICAL AND CHEMICAL TEST REPORTS AS REQUIRED ARE ON FILE AND AVAILABLE FOR REVIEW. PROCESSING, PRODUCT TESTING, INSPECTION & CONTROL OF RAW MATERIAL SHALL BE IN CONFORMANCE WITH ALL APPLICABLE SPECIFICATIONS DRAWINGS AND/OR STANDARDS OF ALL COPIES ON THIS PURCHASE ORDER.

Customer
Flowserve Veryp S.D. No. Wedeatd
Component collemand Carlo
Traceability Code CINT 941
Ficwserve Q.A. Rep. BOHO Date Date
Authorized Inspector (r. r. Date Date

OHMEGA SOLENOID CO., INC.

ΒÝ QUALITY CONTROL CERTIFICATIONS

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PART NAME	Coil	DATE ~1	12-18	
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REMARKS Conles_B)

260969	<u>ltem#caa</u>		135.	25	P/N 041039	69DEDCATD		<u>.</u>
SERIAL NO.	RESISTANCE	DIELECTRIC	CURRENT LIMITS	RESISTANCE				
	290-300 ດ @ 68°F	1500	0.5 AMP MAX @ 140 VDC	LIMITS WITHIN 1%				
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Attachment 2 – Ohmega Failure Analysis Report

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OHMEGA SOLENOID CO., INC.

Customer: Flowserve Date: 4-11-22

Failure Analysis Repor

NCR Number: 1539 Part Number: 3890

Information:

PN 38903 1 pc Shipped PL-45641 PO 256959 1-12-18 (9 pc lot)

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Requirement/Defect Description:

Resistance 290-300 Ω @ 68°F Is: 26.7Ω

Failure Analysis:

Verify reject – low resistance $26.65\Omega \ @\ 68^\circ$ F Visual inspection – no defects found to outer molded surface

Tear down unit to inspect magnet wire/leadwire solder joint. Note: because the unit is molded with epoxy it is not possible to inspect the coil in stages to find failure

Steps taken:

Machine back end of unit to remove outer bobbin flange, exposing magnet wire. Remove coil wire to inspect solder joint

Findings:

Coll is covered by 2 layers of Kapton Tape prior to installing leadwire, solder joint is covered by sleeving and then glass tape held in place with yarn.

Unable to determine cause of failure,

Comments:

Possible cause:

Small nick in the magnet wire insulation that over time caused the coil to short out Unable to determine due to nature of coil/molded

Suggested improvement:

We wind coil with RSN-00997 varnish to provide extra insulation of magnet wire

Completed By: Tin	a Miller Ives
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 $(1,1) \in \{1,2\}$

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OHMEGA SOLENOID CO., INC.

Customer: Flowserve Date: 4-11-22

Reference:

1) Unit as Received

 Remove Epoxy front end Magnet Wire – 2 layers of Kapton Tape – Glass Tape visible



- Inside Coil Magnet wire removed up to Kapton Tape
- 4) Solder Joints, sleeving opened to inspect solder joint





ATTACHMENT 2

Failure Analysis Repor

NCR Number: 1539 Part Number: 3890:

Attachment 3 – 04103969DEDCATD Shipment Data

QUANTITY BY CUSTOMER

Customer, Site	Quantity
Commanche Peak Power Company	12
Comanche Peak	12
Duke Energy	89
Catawba	89
EFH CORPORATE SERVICES	46
Comanche Peak	46
Exelon	62
Braidwood	30
Byron	32
First Energy	8
Beaver Valley	6
Long term storage	2
FPL Energy	4
Seabrook	4
Luminant	4
Comanche Peak	4
Nextera Energy Seabrook LLC	22
Seabrook	22
Texas Utilities Electric Co.	8
Comanche Peak	8
TXU GENERATION COMPANY LP	18
Comanche Peak	18
Grand Total	273