PPG KEELER & LONG

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May 3, 2000

VIA FAX AND OVERNIGHT COURIER

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

NOTICE TO NRC/PART 21 REPORT

Reference: Fax dated April 3, 2000 from Joseph M. Karas representing PPG Architectural Finishes, Inc. ("PPG")
Event Number: 36861

Dear Sir / Madam:

Pursuant to 10 CFR § 21.21(d)(4) this report is being filed for PPG's Keeler & Long division ("Keeler & Long PPG") by:

- Robert W. White
  PPG Architectural Finishes, Inc.
  151 Colfax Street
  Springdale, PA 15144

- Edla Simeon
  Keeler & Long PPG
  P.O. Box 460
  856 Echo Lake Road
  Watertown, CT 06795

The Duke Energy Company ("Duke") (formerly Duke Power Company) has purchased relatively small quantities of the coating 8674 Exterior Silicone Stainless Steel Enamel over a period of years under the mistaken belief that it was qualified for use in containment. To the best of our information the initial purchases were placed in 1987 though it may have been earlier. Over the years, shipments of the product have been sent to all three Duke nuclear facilities, Catawba, McGuire, and Oconee. The amount of material from these shipments that has actually been used

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in containment is unknown to us. To the best of our knowledge, this product has not been sold to any other nuclear utility for use in containment.

The firm initially supplying the component was Keeler & Long, Inc., P.O. Box 460, 856 Echo Lake Road, Watertown, CT 06795 USA. Keeler & Long, Inc. was acquired in December of 1997 by PPG which operates the former company as an internal division under the trade name, Keeler & Long PPG.

DBA qualification testing was performed on the 8674 coating in 1980. The conclusion drawn from that work indicated the product qualified for Coating Service Level 1 exposure because it disintegrated by powdering, leaving no sizeable pieces of coating to interfere with the emergency core cooling system. Nevertheless, the product was not placed under the control of the then Keeler & Long Quality Assurance Program for Nuclear Facilities. Therefore, the formulation was not appropriately controlled as formulation revisions were made.

When Duke last placed an order for the product for Level 1 use, PPG's quality control manager initiated an investigation since PPG did not classify this product as a controlled material. Upon discovering that Duke had placed previous orders for this product for Level 1 service, DBA qualification testing (excluding the radiation exposure portion) was performed on four variations of the 8674 formula that had been manufactured in the past. Included in this group was the original formula on which DBA qualification testing was performed in 1980. On March 24, 2000 the specimens were removed from the test and evaluated. The failure mode for each variation was similar. Each exhibited large blisters with paint chips having delaminated from the substrate which had rusted. During a DBA incident this failure mode could possibly contribute material that has the potential to foul sump pumps thereby interfering with the emergency core cooling system.

Duke has been informed of our latest test results. It is our understanding that they plan to continue to purchase this product for use in containment. However, they have reclassified this material and now identify it on the non-qualified coatings list that they maintain. It should be noted that information has been informally communicated by Duke that the 8674 coating is located on piping that is contained by mirror insulation which should minimize the potential for paint chip fouling of sump pumps in the event of a DBA incident.

Keeler & Long PPG plans to continue to supply the product as a commercial grade item. There are no plans to include this product in our Quality Assurance Program for Nuclear Facilities.

Corrective Action includes reinforcement of procedures and training to closely review purchase orders for containment qualifiifed products to ensure that they reference the appropriate product. The person responsible for implementing this action is Edla Simeon (identified above). This action has been completed.

cc: Duke Energy Company