

General Information or Other (PAR)

Event # 39272

<b>Rep Org:</b> C&D TECHNOLOGIES, INC.	<b>Notification Date / Time:</b> 10/11/2002 17:15 (EDT)
<b>Supplier:</b> C&D TECHNOLOGIES, INC.	<b>Event Date / Time:</b> 10/11/2002 (EDT)
	<b>Last Modification:</b> 10/11/2002
<b>Region:</b> 1	<b>Docket #:</b>
<b>City:</b> BLUE BELL	<b>Agreement State:</b> No
<b>County:</b>	<b>License #:</b>
<b>State:</b> PA	
<b>NRC Notified by:</b> TERRY KANDEN	<b>Notifications:</b> JOHN MADERA R3
<b>HQ Ops Officer:</b> GERRY WAIG	WILLIAM BECKNER NRR
<b>Emergency Class:</b> NON EMERGENCY	
<b>10 CFR Section:</b>	
21.21 UNSPECIFIED PARAGRAPH	

**PART 21 DEFECT/NONCOMPLIANCE IDENTIFIED IN NOT-YET-INSTALLED BATTERY RACKS**

"In accordance with NSP's purchase order requirements and 10CFR21, I am notifying you that C&D Technologies, Inc. has identified what it believes to be a reportable event.

"On purchase order #534, line item 4, an order was placed for two (2) Single Tier racks Part No RD00-900-16EP3. Subsequent to the fabrication of these racks it was observed that a series of welds which join the horizontal cross beam to the vertical member of the frame were not welded correctly. This may affect the seismic qualification of the rack. Our understanding is that these racks have not been installed. C&D is making arrangements to replace the nonconforming frames prior to the facility's scheduled outage.

"Copies of each of the following referenced drawings were supplied to [the licensee] on 10/10/02; the single tier racks (RD00900- 16 EP3) are covered by the following drawings;

"M121 14 (1) and (2) are page one and two of the same drawing. These are the outline drawings for the rack. Page 1 covers the Bill of Material and shows the RD02008E frame is used in rack assembly.

"M1 104 is the frame drawing for part number RD02008E. The critical part of the drawing in our discussion is the gusset support labeled Part No. RE-263 1 (Dwg K-7406).

"Drawing M6228 (1) and (2) reflect the welding details for the racks.

"Detail A on page 1 shows the flare bevel groove weld that is carried across the length of the horizontal cross bar as it is welded to the vertical member of the frame. This should be carried the full distance of the intersection.

"Detail J on page 2 shows the addition of the gusset to reinforce the joint. This is placed over the flare bevel groove weld above and then fillet welded in place.

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"We have been advised that when our sub-tier supplier, Kim Manufacturing, manufactured the frames, they preassembled and clamped the vertical member, horizontal cross member and gusset in place. They performed a flare bevel groove weld on the exposed portion of the horizontal cross member, and fillet welded the remaining sections of the cross member and the gusset. The portion of the cross member which was hidden behind the gusset was not welded with the flare bevel groove weld as it should have been.

"These racks represented the first two racks manufactured by Kim Manufacturing after transfer of this manufacturing function to Kim from C&D's Conshohocken facility. To ensure that the problem did not predate C&D's relationship with Kim we have interviewed the welder responsible for this function within Conshohocken and determined that he was aware of the requirement for a full flare bevel groove weld prior to the assembly of the gusset plate. The welder reports that this was standard practice in Conshohocken. No other racks will be affected by this defect.

"Kim Manufacturing first notified C&E of the defect in the welds on the afternoon of 10/8/02. After analysis by C&D's engineering department on Wednesday (10/9/02) we determined tat we no longer had design traceability to the original seismic qualification of this rack and that this event should be reported. Initial contact was made with NMC Quality Assurance through [a licensee representative] on (10/10/02)."

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Director of Quality Assurance  
1400 Union Meeting Road  
P.O. Box 3053  
Blue Bell, PA 19422-0858  
e-mail: [tkinder@cdtechno.com](mailto:tkinder@cdtechno.com)  
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EN 39272

11 October 2002

Mr. Larry Templeton  
Superintendent, Materials Engineering  
NSP Prairie Island  
1717 Wakonade Drive East  
Welch, MN 55089

Dear Mr. Templeton:

In accordance with NSP's purchase order requirements and 10CFR21, I am notifying you that C&D Technologies, Inc. has identified what it believes to be a reportable event.

On purchase order #534, line item 4 an order was placed for two (2) Single Tier racks Part No RD00-900-16EP3. Subsequent to the fabrication of these racks it was observed that a series of welds which join the horizontal cross beam to the vertical member of the frame were not welded correctly. This may affect the seismic qualification of the rack. Our understanding is that these racks have not been installed. C&D is making arrangements to replace the nonconforming frames prior to the facility's scheduled outage.

Copies of each of the following referenced drawings were supplied to Darlene Stimart on 10/10/02; the single tier racks (RD00900-16 EP3) are covered by the following drawings;

M12114 (1) and (2) are page one and two of the same drawing. These are the outline drawings for the rack. Page 1 covers the Bill of Material and shows the RD02008E frame is used in rack assembly.

M1104 is the frame drawing for part number RD02008E. The critical part of the drawing in our discussion is the gusset support labeled Part No. RE-2631 (Dwg K-7406)

Drawing M6228 (1) and (2) reflect the welding details for the racks.

Detail A on page 1 shows the flare bevel groove weld that is carried across the length of the horizontal cross bar as it is welded to the vertical member of the frame. This should be carried the full distance of the intersection.

Detail J on page 2 shows the addition of the gusset to reinforce the joint. This is placed over the flare bevel groove weld above and then fillet welded in place.

We have been advised that when our sub-tier supplier, Kim Manufacturing, manufactured the frames, they preassembled and clamped the vertical member, horizontal cross member and gusset in place. They performed a flare bevel groove weld on the exposed portion of the

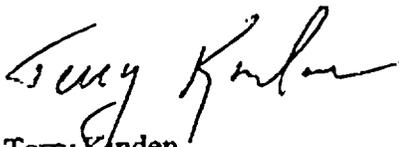
horizontal cross member, and fillet welded the remaining sections of the cross member and the gusset. The portion of the cross member which was hidden behind the gusset was not welded with the flare bevel groove weld as it should have been.

These racks represented the first two racks manufactured by Kim Manufacturing after transfer of this manufacturing function to Kim from C&D's Conshohocken facility. To ensure that the problem did not predate C&D's relationship with Kim we have interviewed the welder responsible for this function within Conshohocken and determined that he was aware of the requirement for a full flare bevel groove weld prior to the assembly of the gusset plate. The welder reports that this was standard practice in Conshohocken. No other racks will be affected by this defect.

Kim Manufacturing first notified C&D of the defect in the welds on the afternoon of 10/8/02. After analysis by C&D's engineering department on Wednesday (10/9/02) we determined that we no longer had design traceability to the original seismic qualification of this rack and that this event should be reported. Initial contact was made with NMC Quality Assurance through Darlene Stimart on (10/10/02).

Should you require further information in this regard, please do not hesitate to contact me.

Sincerely,



Terry Kanden  
 Director Quality Assurance

Cc: Darlene Stimart (NMC) QA  
 Eric Wienola (NMC) QA  
 Operations Control Desk, USNRC

file: NMC, Prairie Island  
 Applications Engineering Order file folder  
 10CFR21 File Folder