



# Howden Buffalo

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Date: June 27, 2005

From: Mr. Paul Stewart, General Manager  
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To: Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Subj: 10CFR21 Reporting of Potential Defects and Noncompliance,  
Sec 21.21 Notification of failure to comply or existence of a defect and its evaluation

Attachments: 1. Howden Buffalo Report of Potential Defect Shipped, QSF 4.13-4  
2. Howden Buffalo "List of Affected Customers"  
3. Howden Buffalo Customer Complaint Report (CCR) 5574, QSF 8.2-1

In accordance with subject regulation and Howden Buffalo internal procedures, Howden Buffalo is submitting a report of a defect or failure to comply for basic components supplied to a nuclear facility (Attachment 1).

Duke Energy, Oconee Plant, reported insufficient adhesion of Carboline topcoat to Carboline primer, resulting in separation of the topcoat on two fans and one other fan inlet bell. The items were manufactured, painted, and supplied to Duke Oconee during the period February 2002 thru March 2002, as basic components in a nuclear safety related application. The three affected items were part of ten complete fans delivered to Duke Oconee both before and after the affected units.

Howden Buffalo conducted an initial investigation that included both Duke Power Materials Engineering & Lab Services and Carboline. Our investigation concluded that coating materials were not defective however, application of Carboline primer was not in accordance with Carboline recommendations for sufficient curing of the primer, resulting in accumulation of VOC's from the uncured primer and ultimate separation of the topcoats.

Howden Buffalo has reviewed internal plant procedures for application of Carboline primer and topcoat, including surface preparation, and found that the procedures failed to incorporate Carboline updated requirements for sufficient curing of the primer. All internal procedures are now revised to incorporate Carboline requirements in their entirety. Howden Buffalo procedures for supplying Carboline coating as a basic component were applicable during the period of October 2001 thru March 2005.

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List of Affected Customers (Attachment 2) includes all customers that were supplied with a safety related coating of Carboline paint during the affected period. Howden Buffalo is contacting each of these customers to:

- a. advise of a potential defect in the Carboline coating,
- b. recommend inspection criteria, and
- c. provide contact information

Questions regarding the status of this notification or corrective actions should be addressed directly to:

Mr. Rod Furniss, Nuclear Sales Manager  
Howden Buffalo, New Philadelphia Division  
New Philadelphia, Ohio  
330 339-1111 ext 276

Yours truly,



Paul Stewart

cc: N Angelini, HBI  
T Gunvalson, HBI  
C Pratt, HBI  
D Lewton, NPO  
R Furniss, NPO