

General Information or Other (PAR)

Event # 44808

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| Rep Org: FISHER CONTROLS INTERNATIONAL | Notification Date / Time: 01/27/2009 17:11 (EST) |
| Supplier: FISHER CONTROLS INTERNATIONAL | Event Date / Time: 01/27/2009 (CST) |
| | Last Modification: 01/27/2009 |
| Region: 3 | Docket #: |
| City: MARSHALLTOWN | Agreement State: Yes |
| County: | License #: |
| State: IA | |
| NRC Notified by: MATTHEW FARRELL | Notifications: WAYNE SCHMIDT R1 |
| HQ Ops Officer: HOWIE CROUCH | GERALD MCCOY R2 |
| Emergency Class: NON EMERGENCY | PATTY PELKE R3 |
| 10 CFR Section: | CHUCK CAIN R4 |
| 21.21 UNSPECIFIED PARAGRAPH | TOM HERRITY NRR |
| | OMID TABATABAI NRO |

PART 21 REPORT - WATER QUALITY DEFICIENCY

The following information was obtained from Fisher Controls International via facsimile:

Fisher Controls International issued a Fisher Information Notice: FIN 2009-02, that notified customers of an issue discovered during an internal audit of manufacturing procedures followed by Fisher Controls International LLC. Specifically, on orders processed by Fisher Controls that invoked demineralized water cleaning requirements, Fisher Controls erroneously certified that all orders met demineralized water requirements when all requirements could not be proven to be met.

To meet the certification requirements, demineralized water must meet the quality requirements of NQA-1. Fisher Controls uses FMP [Fisher Manufacturing Procedure] 12B3 to verify that demineralized water used to clean parts meets NQA-1. Fisher determined that water quality testing using FMP 12B3 performed from January 1, 2001 to May 1, 2008 did not meet the test protocols.

"Twenty two orders have been identified, from 500+ orders reviewed, which require either the use of demineralized water and/or NQA-1 high quality water for which Fisher cannot prove full compliance. It is important to note that this review was limited to nuclear assembly orders only. Safety-related parts orders were not included because final cleaning was done either with alcohol or acetone."

The affected plants are:

Indian Point 2
Seabrook
Millstone (two valves)

JE19
NRR

General Information or Other (PAR)
D.C. Cook
North Anna (two valves)
Catawba (seven valves)
Oconee (five valves)
McGuire (three valves)

Event # 44808



Facsimile

301 South First Avet
Marshalltown, IA 50158

T 641-754-2688
F 641-754-2645

To: NRC Operations Center

Fax: 301-816-5151

Dave A. Suk

From: Director, Quality Valves Worldwide

Date: January 27, 2009

Pages: 7
(incl cover)

Attached is a copy of the Nuclear FIN Notice - FIN 2009-02 issued January 22 and FIN 2009-03 issued January 23 from Emerson Process Management - Fisher Controls International LLC.

For questions please contact – Matthew Farrell
QA Manager
Codes & Standards
641-754-2381



Fisher Controls International LLC
205 South Center Street
P.O. Box 190
Marshalltown, Iowa 50158-0100
USA
T (641) 754-3011
F (641) 754-2830

Fisher Information Notice: FIN 2009-02

22 January 2009

Subject: Water Quality Deficiency - Fisher Orders Invoking Demineralized Water Cleaning Requirements or NQA-1 High Quality Water Requirements

From:

Bill Fitzgerald
Nuclear Business Unit Vice President
Fisher Controls International LLC
205 South Center Street
Marshalltown, IA 50158
Fax: (641) 754-2854

Equipment Affected By This Information Notice:

ORDERS PROCESSED BY FISHER CONTROLS THAT INVOKED DEMINERALIZED WATER CLEANING REQUIREMENTS OR NQA-1 HIGH QUALITY WATER REQUIREMENTS.

Purpose:

The purpose of this Fisher Information Notice (FIN) is to notify customers of an issue discovered during an internal audit of manufacturing procedures followed by Fisher Controls International LLC.

We have informed our customers of record of this circumstance in accordance with 21.21 (b) of 10CFR21 because Fisher Controls International LLC, is not aware of each and every application or system design and cannot determine whether an anomaly could cause a defect or "failure to comply," relating to a substantial safety hazard. In particular, this Information Notice deals with customer orders that invoked demineralized water cleaning requirements per NQA-1 or per individualized customer specifications.

Receipt of this notice does not necessarily mean that the recipient has been shipped any of the subject equipment. It is expected that the recipients of this notice will review the information for applicability to their facilities, and if required, take the appropriate action as described in the section at the end of this notice.

Applicability:

This notice applies only to customer orders requiring specific cleaning with demineralized water or NQA-1 High Quality water requirements that were supplied by Fisher Controls International LLC. Customer orders affected by this notice are listed in an attachment following this notice.



Fisher Information Notice: FIN 2009-02

Although Fisher has identified orders that specifically required cleaning with demineralized water, Fisher's Nuclear Manufacturers Certification form erroneously certified that all orders processed by Fisher Controls met demineralized water requirements.

Description of Possible Concern:

NQA-1 Requirements. Water quality testing performed from January 1, 2001, to May 1, 2008 did not meet the test protocols required by NQA-1-1994 or NQA-1-1997 for high quality water.

For NQA-1, Subpart 2.1, Table 3.4.1 High Quality Water the following requirements apply:

- pH 5.5 to 8.0
- Chloride Less than 1.0 ppm
- Fluoride Less than 1.0 ppm
- Sulfide Less than 1.0 ppm
- Silica Less than 0.05 ppm
- Conductivity at 25 C (77 F) Less than 3 mho/cm
- Total Suspended Solids Less than 3.0 ppm

It is not possible with the data available to verify that Fisher was in compliance in this time period because testing was not performed to adequate levels as well as missing test data.

FMP 12B3 Requirements. In addition to the requirements of NQA-1, Fisher Controls determined that additional test protocols were not met as required by Fisher internal manufacturing procedure FMP 12B3, "Demineralized Water – Testing & Control (0.1 PPM Halides)".

- Calcium Less than 0.5 ppm
- Copper Less than 0.1 ppm
- Iron Less than 0.5 ppm
- Magnesium Less than 0.5 ppm
- Manganese Less than 0.5 ppm
- Potassium Less than 1.0 ppm
- Sodium Less than 1.0 ppm
- Zinc Less than 0.1 ppm

Again, it is not possible with the data available to verify that Fisher was in compliance in this time period because testing was not performed to adequate levels as well as missing test data.

Manufacturer's Certification Form for Nuclear Safety-Related Items. The Fisher Manufacturer's Form for Nuclear Safety-Related Items states that all metallic parts were cleaned per N45.2.1 Class C (FMP 7X5). Fisher Manufacturing Procedure FMP 7X5, "Cleaning of Metal Parts for Nuclear Applications per ANSI N45.2.1 – Special Cleaning – Less than 1.0 Halogens", references FMP 12B3 as the requirements for demineralized water. Whether the order specified a demineralized water cleanliness requirement, all orders processed in this time period were incorrectly certified to having met this requirement because of the problems with FMP 12B3 above.

Discussion:

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It is also important to note that the water used in this application was treated through reverse osmosis and subsequent resin beds. This process was designed to accommodate the high water quality requirements mentioned above.

Although objective evidence is not available to determine why this issue occurred, it is believed that the loss of key personnel and realignment of staff created a situation where ownership relating to water quality compliance was lost. Consequently, water quality issues were not reviewed by internal or external auditing activities. Currently, resources have been allocated to remedy this issue and ensure compliance and ownership. Fisher Manufacturing Procedure FMP 12B3 has now been revised to require corrective action per the Fisher Nuclear Quality Assurance Manual.

Twenty two orders have been identified, from 500+ orders reviewed, which require either the use of demineralized water and/or NQA-1 high quality water for which Fisher cannot prove full compliance. It is important to note that this review was limited to nuclear assembly orders only. Safety-related parts orders were not included because final cleaning was done either with alcohol or acetone.

Action Required:

- No action is required if you have not ordered items with demineralized water cleaning requirements.
- Fisher has identified customer orders with this processing requirement and is including a list applicable to each site as an attachment to this Information Notice. It is recommended that these customers review these specified orders and determine if on site cleaning was performed prior to installation that would minimize issues raised by this information notice.

10CFR21 Implications:

Fisher Controls requests that the recipient of this notice review it and take appropriate action in accordance with 10CFR21.

If there are any technical questions or concerns, please contact:

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Manager, Quality
Fisher Controls International LLC
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Phone: (641) 745-2066
Michael.Wedemeyer@Emerson.com



Fisher Information Notice: FIN 2009-02**Orders Requiring High Quality Demineralized Water**

| Fisher Order | Customer Order | Utility | Plant Site |
|---------------------|-----------------------|---------------------------|-------------------|
| 001-A01268387A | 4500530589 | Entergy Nuclear Northeast | Indian Point 2 |
| 002-A009062678 | 02204897 | FPL Energy Seabrook | Seabrook |
| 002-A009028488 | 03000028 | Dominion | Millstone |
| 002-A009052284 | 45291649 | Dominion | Millstone |
| 011-A005121583 | 190-0000040452 | American Electric Power | Cook |
| 032-1086203791 | 45514789 | Dominion Virginia Power | North Anna |
| 032-1086205366 | 45529908 | Dominion Virginia Power | North Anna |
| 033-B800126834 | DP12719 | Duke Energy | Catawba |
| 033-A003072573 | ON45757 | Duke Energy | Oconee |
| 033-A003076619 | CN52214 | Duke Energy | Catawba |
| 033-B800136389 | DP15013 | Duke Energy | McGuire |
| 033-B800137867 | DP18148 | Duke Energy | Catawba |
| 033-B800141716 | NM25345 | Duke Energy | Catawba |
| 033-B800141832 | NM25344 | Duke Energy | Catawba |
| 033-B800144580 | NM26273 | Duke Energy | Catawba |
| 033-B800151240 | 00082526, Rev. 4 | Duke Energy | Oconee |
| 033-B800158219 | 00090265, Rev. 2 | Duke Energy | McGuire |
| 033-B800163808 | DP16169 | Duke Energy | Oconee |
| 033-B800163809 | DP16170 | Duke Energy | Oconee |
| 033-B800163810 | DP16655 | Duke Energy | Oconee |
| 033-B800115814 | DP6565 | Duke Energy | Catawba |
| 033-B800119093 | DP8669 | Duke Energy | McGuire |