



INTERNATIONAL

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May 2, 2013

**VIA OVERNIGHT MAIL**

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555-0001

**Re: Follow-Up to Part 21 Interim Report Notifications Dated March 18, 2013 and April 11, 2013**  
**Event No. ML13079A320**

Dear Sir or Madam:

AAF International ("AAF") submits this letter to the U.S. Nuclear Regulatory Commission ("NRC") as a follow-up to its previous Part 21 interim notifications of a possible deviation or defect in nuclear qualified High Efficiency Particulate Air ("HEPA") filters manufactured by AAF, dated March 18, 2013 and April 11, 2013. This follow-up letter is submitted in furtherance of AAF's previous letters and pursuant to the requirements of 10 CFR Part 21.

In its previous letters, AAF informed the NRC that AAF was undertaking an investigation into a test failure of two (2) nuclear qualified HEPA filters. The test failures apparently occurred when a customer of AAF subjected the filters to the air flow and water spray environment test conditions and requirements listed in ASME AG-1, Section FC-5140. AAF's investigation involved constructing nuclear qualified HEPA filters using the same processes and materials as those that failed our customer's sampling procedure, and subjecting the filters to testing using the same protocols and parameters as the sampling procedure that showed a possible defect. Ultimately, AAF's testing could not replicate filter media ruptures to the extent of those exhibited by the testing conducted at the customer's testing facility.

As a result, AAF has initiated a second phase of testing during which AAF will construct nuclear HEPA filters with the same build specifications as the previously tested filters. These filters will be sent to the Edgewood Chemical Biological Center testing facility to test the filters at the NRC's recognized facility for ASME AG-1 testing and qualification. AAF anticipates that this process will be complete in approximately six (6) weeks based on the estimated availability for scheduling the required testing at Edgewood, and AAF will file a written update with the NRC no later than June 14, 2013.

In the meantime, if you have any questions or require any additional information, you may contact the undersigned at (502) 637-0275, or via email at [mwatkins@aafintl.com](mailto:mwatkins@aafintl.com).

Sincerely,

Marilyn J. Watkins  
Director, Quality Assurance

JE19  
NRK