

November 14, 2013

Mr. David Tuttle, Quality Assurance Manager
Pentair Valves and Controls
55 Cabot Boulevard
Mansfield, MA 02048

SUBJECT: NUCLEAR REGULATORY COMMISSION INSPECTION REPORT
NO. 99901431/2013-201 AND NOTICE OF NONCONFORMANCE

Dear Mr. Tuttle:

Thank you for your September 20, 2013, letter in response to the Notice of Nonconformance (NON) that were discussed in the subject U.S. Nuclear Regulatory Commission (NRC) inspection report (IR).

We reviewed your letter and found that it was responsive and acceptable in regards to one of the issues discussed in IR No. 99901431/2013-201. However, there are the following NONs that require clarification and additional information. Specifically, Pentair's response to:

- NON 99901431/2013-201-01 stated that Pentair's Valve Qualification Test Procedure (VQT) 38188 was modified to include the following text: "Engineering must verify the direction of the least rigid axis against the results of the natural frequency test for each valve assembly and advise the test engineer regarding the direction in which the seismic load is to be applied." Also, PV-16 was re-tested under the correct configuration to test the valve applying the force to the least rigid axis. Further Pentair's response stated that as part of the corrective actions a request was submitted to return PV-62 to Pentair to be re-tested. However your response failed to explain what actions Pentair will take to ensure that the re-test of PV-62 is going to be performed applying the static load to the least rigid axis. Please clarify your response to address this concern.
- NON 99901431/2013-201-02 stated that Pentair failed to establish a test program to ensure that the testing required was performed in accordance with written test procedures to demonstrate that structures, systems, and components will perform satisfactorily in service. However, your response to one of the examples failed to have a clear explanation about the validity of the test of the PV-62 pressurizer relief valve, which was performed at a temperature higher than the allowable by procedural requirements. Further the proposed corrective action is not clear if Pentair is going to re-test the valve or provide an engineering justification of the validity of the test which was performed at a temperature higher than the allowable by procedural requirements. Please clarify your response to address these concerns.

CONTACT: Jonathan Ortega-Luciano, NRO/DCIP
301-415-1159

- NON 99901431/2013-201-04 stated that Pentair took immediate corrective action to verify the location of all the Neolube 1 bottles in the shop and that training was provided regarding the use of Neolube 1. Further the response stated that the Manufacturing Supervisor was trained to monitor and label all new incoming shipments of Neolube 1 prior entering the shop. However, your response failed to describe what controls Pentair will have in place to avoid inadvertent use of Neolube 1 in the nuclear components. Also, it is not clear to the staff if Pentair performed a revision of their procedures, instructions and drawings to ensure that Neolube 1 is not in use in nuclear components. Please clarify your response to address these concerns.
- NON 99901431/2013-201-05 stated that Pentair failed to adequately verify that commercial items received from its suppliers conformed to the applicable specification requirements and failed to validate required critical characteristics during commercial grade dedication receipt inspection and testing for three U-cup O-rings that were being commercially dedicated using a sampling process. However, your response is not responsive to our concerns documented in NON 99901431/2013-201-05. Please clarify your response to address NON 99901431/2013-201-05.
- NON 99901431/2013-201-06 stated that Pentair rely on the thermostat setting on the weld rod oven and that a quarterly monitoring of the oven is performed in accordance with the AG Crosby calibration procedure CPIE-0240. However, your response failed to explain what controls Pentair will have in place to ensure that the temperature read out display and humidity indication provided by these thermostats provide reasonable assurance that the weld rods were maintained in accordance with the applicable sections of the ASME Code. Please clarify your response to address this concern.

In accordance with Title 10 of the *Code of Federal Regulation* (10 CFR) 2.390 "Public Inspections, Exemptions, Requests for Withholding," of the NRC's "Rules of Practice," a copy of this letter, its enclosure(s), and your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System, accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request that such material is withheld from public disclosure, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21 "Protection of Safeguards Information: Performance Requirements."

T. Tuttle

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Please contact Mr. Jonathan Ortega-Luciano via electronic mail at jonathan.ortega-luciano@nrc.gov, if you have any questions or need assistance regarding this matter.

Sincerely,

/RA/

Edward H. Roach, Chief
Mechanical Vendor Inspection Branch
Division of Construction Inspection
and Operational Programs
Office of New Reactors

Docket No.: 99901431

T. Tuttle

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Edward H. Roach, Chief
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Docket No.: 99901431

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