



Anderson Greenwood Crosby
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December 26, 2013

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Subject: Reply to Request for Clarification and Additional Information
NRC Inspection Report No. 99901431/2013-201
Nonconformances 99901431/2013-201-01, -02, -04, -05 and -06

Dear Sir:

In response to your letter dated November 14, 2013, the following clarifications and additional information is provided.

Nonconformance 99901431-2013-201-01

In answer to your request for an explanation of what actions Pentair will take to ensure that the re-test of PBV-62 is going to be performed applying the static load to the least rigid axis, Pentair Valve Qualification Test Procedure VQT-38188 was modified to require a photograph of the test setup to permit independent verification of proper direction of loading.

Nonconformance 99901431-2013-201-02

In response to your request for an explanation about the validity of the test of the PV-62 pressurizer relief valve performed at an ambient temperature 25°F higher than that specified in the test procedure, the ambient temperature difference has no significant effect on steel safety valves in high pressure steam service. A re-test of the valve is unnecessary.

Nonconformance 99901431-2013-201-04

Pentair has searched through all its procedures and identified those that call for "Neolube" for "Neolube 1". In addition to the steps previously identified, reference to Neolube will be deleted in all procedures by January 31, 2014.

Nonconformance 99901431-2013-201-05

Pentair understands that it relied on commercial supplier-issued Certified Material Test Reports to verify critical characteristics for entire batches of elastomeric parts as the sole method to verify critical characteristics for the batch without verifying that the supplier's qualify program was capable of the

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appropriate control. Pentair will conduct commercial-grade surveys of its suppliers of elastomeric parts to verify the supplier's quality program is capable of appropriate control of the required critical characteristics, including material traceability and adequacy of Certificates of Conformance or Certified Material Test Reports. We expect to have the commercial grade surveys of all suppliers completed by February 28, 2014.

Nonconformance 99901431-2013-201-06

In addition to the corrective steps previously reported, Pentair is implementing a change in procedure to require daily checks of the oven temperatures by Quality Control personnel, kept on a log maintained by Quality Assurance. The procedure and training required will be completed by January 31, 2014.

Sincerely,

A handwritten signature in black ink that reads "D. E. Tuttle".

David E. Tuttle
Quality Assurance Manager

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