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10 CFR 21.21

December 11, 2014

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

**SUBJECT: UPDATED INTERIM 10 CFR PART 21 REPORT REGARDING  
DEVIATIONS OF COATINGS FOR PIPE SUPPORTS FOR AP1000®  
PROJECTS**

The attachment to this letter provides an updated interim report in accordance with 10 CFR 21.21 pertaining to the identification of deviations associated with coatings on pipe supports being supplied for the V. C. Summer and Vogtle AP1000® nuclear projects. The initial interim report was previously provided by letter dated October 15, 2014. The deviations being evaluated are associated with the use of an incorrect coating type for recently procured pipe supports.

Evaluation for reportability in accordance with 10 CFR Part 21 was not able to be completed within the extended evaluation period due to the need to obtain the review of the draft evaluation by the applicable design authority. It is expected that the evaluation for reportability will be completed by January 12, 2015.

If you have any questions pertaining to this information, please contact Curtis Castell, Licensing Manager, at 980-321-8314.

Sincerely,

A handwritten signature in black ink that reads 'Don DePierro'. The signature is written in a cursive, flowing style.

Don DePierro  
Senior Vice President

cc: Regional Administrator, USNRC, Region II

Attachment

IE 19  
NRB

UPDATED INTERIM 10 CFR PART 21 REPORT REGARDING DEVIATIONS OF  
COATINGS FOR PIPE SUPPORTS FOR AP1000® PROJECTS

This report is being provided as an updated interim report in accordance with 10 CFR 21.21.

(i) Name and address of the individual or individuals informing the Commission.

Mr. Don DePierro  
CB&I Power  
128 S. Tryon St., Suite 1000  
Charlotte, NC 28202

(ii) Identification of the facility, the activity, or the basic component supplied for such facility or such activity within the United States which fails to comply or contains a defect.

No basic components have been determined to fail to comply or contain a defect. This is an interim report. The deviations being evaluated are associated with the use of incorrect coatings for pipe supports intended to be used for the V. C. Summer and Vogtle AP1000® nuclear projects.

(iii) Identification of the firm constructing the facility or supplying the basic component which fails to comply or contains a defect.

No basic components have been determined to fail to comply or contain a defect. This is an interim report. The deviations being evaluated are associated with the use of incorrect coatings for pipe supports intended to be used for the V. C. Summer and Vogtle AP1000® nuclear projects. The affected piping supports are being supplied by LISEGA Inc. USA, 370 East Dumplin Valley Rd., Kodak, TN 37764. Note that LISEGA supplied the pipe supports with coating material as specified in the purchasing documents. Subsequent review has determined that the purchasing documents specified incorrect information for many of the supports, which should have been coated with a different material.

(iv) Nature of the defect or failure to comply and the safety hazard which is created or could be created by such defect or failure to comply.

No basic components have been determined to fail to comply or contain a defect. This is an interim report. The deviations being evaluated are associated with the use of incorrect coatings for pipe supports intended to be used for the V. C. Summer and Vogtle AP1000® nuclear projects.

It is currently expected that the evaluation of these conditions will be completed by January 12, 2015.

(v) The date on which the information of such defect or failure to comply was obtained.

The discovery date of these deviations is based on the date of the associated CB&I Power Corrective Action Report (CAR). That CAR was initiated on March 10, 2014. Due to a processing error the March 10, 2014, CAR was not properly identified and tracked for Part 21 reportability evaluation. The failure to properly identify and track this condition has been identified in the CB&I Power Corrective Action Program.

(vi) In the case of a basic component which contains a defect or fails to comply, the number and location of these components in use at, supplied for, being supplied for, or may be supplied for, manufactured, or being manufactured for one or more facilities or activities subject to the regulations in this part.

No basic components have been determined to fail to comply or contain a defect. This is an interim report. The deviations being evaluated are associated with the use of incorrect coatings for pipe supports intended to be used for the V. C. Summer and Vogtle AP1000® nuclear projects. An estimated 2,819 pipe supports are currently considered to have the incorrect coating. The nonconforming pipe supports were initially placed into a "hold" status and are now in the process of being corrected. The pipe supports are associated with piping systems inside containment.

(vii) The corrective action which has been, is being, or will be taken; the name of the individual or organization responsible for the action; and the length of time that has been or will be taken to complete the action.

No basic components have been determined to fail to comply or contain a defect. This is an interim report. The deviations being evaluated are associated with the use of incorrect coatings for pipe supports intended to be used for the V. C. Summer and Vogtle AP1000® nuclear projects. Actions are in progress to complete the 10 CFR Part 21 evaluation. Additional time is needed to allow review of the draft evaluation by the design authority, Westinghouse Electric Company. The pipe support coatings are being corrected, as necessary.

It is currently expected that the evaluation of these conditions will be completed by January 12, 2015.

(viii) Any advice related to the defect or failure to comply about the facility, activity, or basic component that has been, is being, or will be given to purchasers or licensees.

No basic components have been determined to fail to comply or contain a defect. This is an interim report.

(ix) In the case of an early site permit, the entities to whom an early site permit was transferred.

Not applicable.