

Part 21 (PAR)

Event # 50888

Rep Org: WEIR VALVES AND CONTROLS USA INC.		Notification Date / Time: 03/13/2015 15:48 (EDT)	
Supplier: WEIR VALVES AND CONTROLS USA INC.		Event Date / Time: 03/13/2015 (EDT)	
Last Modification: 03/13/2015			
Region: 1		Docket #:	
City: IPSWITCH		Agreement State: Yes	
County:		License #:	
State: MA			
NRC Notified by: ARTHUR BUTTERS		Notifications: STEVE ORTH R3DO	
HQ Ops Officer: DANIEL MILLS		PART 21/50.55 REACTORS EMAIL	
Emergency Class: NON EMERGENCY			
10 CFR Section:			
21.21(d)(3)(i) DEFECTS AND NONCOMPLIANCE			

IMPROPER WELD USED ON GATE VALVE COVER

The following was received from the licensee via email:

"This notification is being submitted pursuant to the guidelines of 10 CFR Part 21 to report that, during the manufacturing of a replacement cover for a 24 inch gate valve on the reactor recirc line at Exelon LaSalle, Weir Valves and Controls used a weld that was not compliant to ASME III Subsection NB requirements.

"During review of the weld at site, the question was raised based on site procedures required a 2:1 profile in accordance to EPRI guidelines. During review of the documentation to determine if the 2:1 profile was required in this case, Weir Valves and Controls determined that improper weld call out was used on the design prints. The weld was corrected at site to meet the both ASME III Subsection NB requirements and EPRI guidelines.

"Weir Valves and Controls has performed an extent condition review and has concluded that no other undersized welds were made and delivered to any other operating sites.

"The root-cause of the issue was the improper call-out of the weld by design engineering.

"Weir Valves and Controls is performing corrective actions to ensure future re-occurrences cannot occur in design engineering."

TE19
NRR

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Excellent
Engineering
Solutions



March 13, 2015

NRC's Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

RE: Exelon LaSalle Cover Modification for 2B33-F067B (IR #2443746)

Dear Sir or Madam;

This notification is being submitted pursuant to the guidelines of 10 CFR Part 21 to report that, during the manufacturing of a replacement cover for a 24" Gate valve on the reactor recirc line at Exelon LaSalle, Weir Valves and Controls used a weld that was not compliant to ASME III Subsection NB requirements.

During review of the weld at site, the question was raised based on site procedures required a 2:1 profile in accordance to EPRI guidelines. During review of the documentation to determine if the 2:1 profile was required in this case, Weir Valves and Controls determined that improper weld call out was used on the design prints. The weld was corrected at site to meet the both ASME III Subsection NB requirements and EPRI guidelines.

Weir Valves and Controls has performed an extent condition review and has concluded that no other undersized welds were made and delivered to any other operating sites.

The root-cause of the issue was the improper call-out of the weld by design engineering.

Weir Valves and Controls is performing corrective actions to ensure future re-occurrences cannot occur in design engineering.

Please feel free to contact me with any questions or comments.

Regards,

A handwritten signature in black ink, appearing to read "A. Butters", with a long horizontal line extending to the right.

Arthur C. Butters
Director of Engineering; Nuclear

WEIR	10 CFR PART 21 EVALUATION	DOCUMENT	PAGE
	Evaluation of Deviation or Potential Failure to Comply	10CFR012815	1 of 4

Part 1: Identification of Concern and Preliminary Evaluation

1A Identify the source of the information on the **deviation** or **potential failure to comply**:
Weir drawing 42115-807 calls for a 1/16" (0.06") fillet weld attaching Item 1 and Item 2.

1B Describe the **deviation** or **potential failure to comply** that has been discovered:
Drawing 42115-807 is designed to ASME Sect III, Class 1 1971 edition with no addenda. Fig NB-4427.1 gives the minimum weld thickness requirements for this particular weld. The minimum required thickness is 0.274"

1C If the issue concerns ☒ a **potential failure to comply**, go to Section 1D; ☐ a **deviation**, go to Section 1E

1D Does the potential failure to comply represent a violation of the Atomic Energy Act of 1954, as amended, or any applicable rule, regulation, order, or license of the NRC, including technical specification limits?
If **Yes** or **Uncertain**, check ☒ and complete Section 1E.
If **No**, check ☐ and complete Section 1F.

1E(1) Does the **deviation** affect the functionality of items or services provided by Weir Valves & Controls USA?
If **Yes** or **Uncertain**, check ☒ and complete Section 1E(2).
If **No**, check ☐ and complete Section 1F and Explain:

1E(2) Does the **deviation** involve a **basic component**?
If **Yes** or **Uncertain**, check ☒ and complete Section 1E(3).
If **No**, check ☐ and complete Section 1F and Explain:

1E(3) Has the **basic component** been delivered to a customer?
If **Yes** or **Uncertain**, check ☒ and complete Section 1E(4).
If **No**, check ☐ and complete Section 1F and Explain:

1E(4) Does the **basic component** deviate from the requirements of the customer's procurement document?
If **Yes** or **Uncertain**, check ☒ and complete Section 1G.
If **No**, check ☐ and complete Section 1F and Explain:

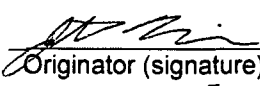
1F The **deviation** or **potential failure to comply** is not reportable in accordance with 10CFR21.

_____ Originator (signature)	_____ Originator (print)	_____ Date
_____ Designated Responsible Officer (signature)	_____ Designated Responsible Officer (print)	_____ Date

Have local Director, Quality Assurance retain this form on file for 5 years

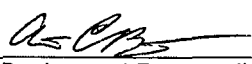
Discovery

1G The **deviation** or **potential failure to comply** warrants further **evaluation** in accordance with 10CFR21.


 Originator (signature)	Justin Meier Originator (print)	1/29/15 Date
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Forward this form with relevant information to the Designated Responsible Officer.

1H I have reviewed Part 1 and determined that the **deviation** or **potential failure to comply** should be evaluated based on the basis below for reportability in accordance with 10CFR21. (Start of 60-day clock)

 Designated Responsible Officer (signature)	2/2/15 Date	Initial Due Date: 3/7/15
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Within the 60-day clock started above, I will evaluate the **deviation** or **potential failure to comply** discovered in Part 1 to determine reportability in accordance with 10CFR21.

 Cognizant Technical Engineer (signature)	2/2/15 Date
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WEIR	10 CFR PART 21 EVALUATION Evaluation of Deviation or Potential Failure to Comply	DOCUMENT 10CFR012815.docx	PAGE 2 of 4
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Part 2: Technical Evaluation

2A Identification of the company supplying the **basic component** or activity which contains a **deviation** or potential **failure to comply**:

Weir Valves & Controls supplied the basic component that failed to comply with the Subsection NB weld requirements of ASME Sect. III

2B ☒ Confirm the information in Part 1. Note any discrepancies that need to be addressed:

There are no discrepancies to be addressed.

2C Provide A) Technical Justification of Unit Acceptability; or B) Proposed Technical Solution

B) Proposed Technical Solution

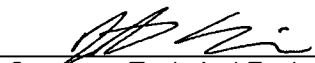
The issue was brought to the attention of Weir Valves & Controls during receipt inspection of the basic component in the plant due to the weld not in conformance with Exelon Internal Procedures CC-AA-501-1008 Revision 7 & CC-AA-501-1025 Revision 5 guidelines to have a 2:1 profiles for socket welds in high vibration service. Upon investigation, Weir Valves & Controls determined the weld did not comply with the requirements of ASME Sect. III Subsection NB socket welds.

The decision was made for the plant to do a weld repair under the sites ASME Sect XI Program. The repair was performed under Work Order 1747359-32 (as identified in IR2443746). The repair brings the non-compliant weld back into compliance of ASME Sect III Subsection NB weld requirements.

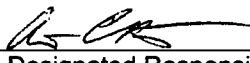
Weir Valves & Controls has revised drawing 42115-807 to reflect the correct weld size.

It appears that this would create a potential safety hazard depending on plant conditions. Weir Valves & Controls to continue the evaluation with input from the plant, and review the issue with other sites.

- ☒ This issue is reportable pursuant to 10CFR21.
☐ This issue is not reportable pursuant to 10CFR21.
☒ A decision on reportability cannot be made based on the available information.

 J. Mercer 2/27/15
 Cognizant Technical Engineer (signature) Date

Review with the DRO within 5 days of completion

 A. Butters 2/27/15
 Designated Responsible Officer (signature) Date

The DRO will finalize the reporting requirements and submit the reports to the NRC and any affected facilities within 30 days.



10 CFR PART 21 EVALUATION
Evaluation of Deviation or Potential Failure to
Comply

DOCUMENT
10CFR012815.docx

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Part 3 Determination of Reportability Evaluation

3A Basis for decision:

After review with the site, the undersized weld is reportable under 10CFR21. Due to the issue being brought up at plant inspection, and the weld presenting a failure to comply with ASME Section III Subsection NB.

3B Number and location of all affected components:

In extent condition for both valve and service modification orders, Weir identified all orders with socket welds that needed to be evaluated to ensure the attached welds meet the requirements of the applicable code year. Based on this thorough review, only the valve bonnet that was shipped to LaSalle and started this evaluated (WVC CO 0030000297) was identified. As part of a modification, this is only instance that this particular design is used. The weld was repaired prior to being installed at the plant to meet the requirements of ASME Section III.

3C I have evaluated the information and technical assessment developed and

- ☒ This issue is reportable pursuant to 10CFR21.
- ☐ This issue is not reportable pursuant to 10CFR21.
- ☐ A decision on reportability cannot be made based on the available information.

Based on this determination, I will proceed with all proper notifications within the allowable timeframes.

Designated Responsible Officer (signature)

3/12/15

Date