Group B

FOIA/PA NO: 2015-0205

RECORDS BEING RELEASED IN PART

The following types of information are being withheld:

Ex. 1: ☐ Records properly classified pursuant to Executive Order 13526
Ex. 2: ☐ Records regarding personnel rules and/or human capital administration
Ex. 3: ☐ Information about the design, manufacture, or utilization of nuclear weapons
☐ Information about the protection or security of reactors and nuclear materials
☐ Contractor proposals not incorporated into a final contract with the NRC
☐ Other_____
Ex. 4: ☐ Proprietary information provided by a submitter to the NRC
☐ Other_____
Ex. 5: ☒ Draft documents or other pre-decisional deliberative documents (D.P. Privilege)
☐ Records prepared by counsel in anticipation of litigation (A.W.P. Privilege)
☐ Privileged communications between counsel and a client (A.C. Privilege)
☐ Other_____
Ex. 6: ☒ Agency employee PII, including SSN, contact information, birthdates, etc.
☐ Third party PII, including names, phone numbers, or other personal information
Ex. 7(A): ☐ Copies of ongoing investigation case files, exhibits, notes, ROI's, etc.
☐ Records that reference or are related to a separate ongoing investigation(s)
Ex. 7(C): ☐ Special Agent or other law enforcement PII
☐ PII of third parties referenced in records compiled for law enforcement purposes
Ex. 7(D): ☐ Witnesses' and Allegers' PII in law enforcement records
☐ Confidential Informant or law enforcement information provided by other entity
Ex. 7(E): ☐ Law Enforcement Technique/Procedure used for criminal investigations
☐ Technique or procedure used for security or prevention of criminal activity
Ex. 7(F): ☐ Information that could aid a terrorist or compromise security

Other/Comments:_____

Pannier, Stephen

From:	Pannier, Stephen
Sent:	Friday, January 16, 2015 9:13 AM
To:	Pasquale, Daniel; Prescott, Paul; Kendzia, Thomas; Armstrong, Aaron; Issa, Alfred
Cc:	King, Mark
Subject:	RE: Event Notice: 01/14/2015 - Part 21 - CB&I

Hi Folks,

Thanks Dan. The two Interim Reports are our Part 21 Nos. 2014-76-00 and 01

Here are links to these documents:

http://pbadupws.nrc.gov/docs/ML1429/ML14296A427.pdf

Open ADAMS P8 Document(Updated Interim 10 CFR Part 21 Report Regarding Deviations of Coatings for Pipe Supports for AP1000 Projects.)

Thanks

Steve

-----Original Message-----
From: Pasquale, Daniel
Sent: Thursday, January 15, 2015 10:32 AM
To: Pannier, Stephen; Prescott, Paul; Kendzia, Thomas; Armstrong, Aaron; Issa, Alfred
Cc: King, Mark
Subject: RE: Event Notice: 01/14/2015 - Part 21 - CB&I

FYI:

"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. Interim Part 21 reports dated October 15, 2014, and December 11, 2014, were submitted to the NRC.

- see attached:

Daniel J. Pasquale,
Sr. Operations Engineer
U.S. NRC, Office of New Reactors
Washington, DC 20555-001
(301) 415-2498 _office
(301) 415-5399_fax

-----Original Message-----
From: Pannier, Stephen
Sent: Thursday, January 15, 2015 8:53 AM
To: Prescott, Paul; Kendzia, Thomas; Armstrong, Aaron; Issa, Alfred; Pasquale, Daniel

B1

Cc: King, Mark
Subject: FW: Event Notice: 01/14/2015 - Part 21 - CB&I

Hi Folks

Attached is a fax copy of the Part 21 submittal provided by CB&I in EN 50734.

I think this condition was originally reported in an interim report but I need to check

Thanks

Steve

From: HOO Hoc
Sent: Wednesday, January 14, 2015 4:47 PM
To: HOO Hoc
Subject: Event Notice: 01/14/2015 - Part 21 - CB&I

If you have any questions, please call the Ops Center.

Headquarters Operations Officer
U.S. Nuclear Regulatory Commission
Phone: 301-816-5100
Fax: 301-816-5151
email: hoo.hoc@nrc.gov
secure e-mail: (b)(6)

Pannier, Stephen

From:	HOO Hoc
Sent:	Wednesday, January 14, 2015 4:48 PM
To:	HOO Hoc
Subject:	Event Notice: 01/14/2015 - Part 21 - CB&I
Attachments:	Summary.pdf; Events.pdf; (50734) EN # 50734- CB&I.pdf

If you have any questions, please call the Ops Center.

Headquarters Operations Officer
U.S. Nuclear Regulatory Commission
Phone: 301-816-5100
Fax: 301-816-5151
email: hoo.hoc@nrc.gov
secure e-mail: (b)(6)

B2

Pannier, Stephen

From:	Pannier, Stephen
Sent:	Thursday, January 15, 2015 8:53 AM
To:	Prescott, Paul; Kendzia, Thomas; Armstrong, Aaron; Issa, Alfred; Pasquale, Daniel
Cc:	King, Mark
Subject:	FW: Event Notice: 01/14/2015 - Part 21 - CB&I
Attachments:	Summary.pdf; Events.pdf; (50734) EN # 50734- CB&I.pdf

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I think this condition was originally reported in an interim report but I need to check

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Phone: 301-816-5100
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email: hoo.hoc@nrc.gov
secure e-mail: (b)(6)

B3

Musser, Randy

From: Michel(R2), Eric
Sent: Thursday, January 15, 2015 8:35 AM
To: Artayet, Alain; Carman, Paul; Christensen, Jason; Harmon, David; Shannon, Mel; Steadham, Timothy; Steddenbenz, Katherine
Cc: Musser, Randy
Subject: FW: Event Notice: 01/14/2015 - Part 21 - CB&I

Just a reminder, please make sure you are reviewing each smart plan in CIPMS as part of your inspection prep. We continue to add notes (such as the one shown below) as an alert to inspectors when we run across an issue affecting those smart plans. You may not otherwise be aware of these issues unless you've reviewed the site-specific smart plans prior to inspection. Thanks.

Eric

-----Original Message-----
From: Michel(R2), Eric
Sent: Thursday, January 15, 2015 8:30 AM
To: Musser, Randy
Subject: RE: Event Notice: 01/14/2015 - Part 21 - CB&I

The following note was added to both smart plans for this ITAAC:

IMPORTANT SAFETY NOTE: The inspector(s) should review Event Notification EN 50734 (1/14/2015) for a Part 21 report which may affect the coatings covered by this ITAAC. Incorrect coatings were applied to over 2,800 non-safety supports used inside containment which, "impacts debris generation and long-term cooling analyses performed for the AP1000 design."

Eric

-----Original Message-----
From: Michel(R2), Eric
Sent: Thursday, January 15, 2015 8:11 AM
To: Musser, Randy
Subject: RE: Event Notice: 01/14/2015 - Part 21 - CB&I

I thought we had given all the coatings ITAAC to the residents, but we still have two; one of which is affected: 2.2.1.8c.x.

8.c) The PXS provides RCS makeup, boration, and safety injection during design basis events.

Inspections, Tests, And Analyses
x) Inspections will be conducted of the as-built nonsafety-related coatings or of plant records of the nonsafety-related coatings used inside containment on walls, floors, ceilings, and structural steel except in the CVS room. Inspections will be conducted of the as-built non-safety-related coatings or of plant records of the non-safety-related coatings used on components below the maximum flood level of a design basis LOCA or located above the maximum flood level and not inside cabinets or enclosures. Inspections will be conducted on caulking, tags, and signs used inside containment below the maximum flood level of a design basis LOCA or located above the maximum flood level and not inside cabinets or enclosures. Inspections will be conducted of ventilation filters and fiber-producing fire barriers used inside containment within the ZOI or below the maximum flood level of a design basis LOCA.

B4

Acceptance Criteria
x) A report exists and concludes that the coatings used on these surfaces have a dry film density of ≥ 100 lb/ft3. If a coating is used that has a lower dry film density, a report must exist and conclude that the coating will not transport. A report exists and concludes that inorganic zinc coatings used on these surfaces are Safety – Service Level I. A report exists and concludes that tags and signs used in these locations are made of steel or another metal with a density ≥ 100 lb/ft3. In addition, a report exists and concludes that caulking used in these locations or coatings used on these signs or tags have a dry film density of ≥ 100 lb/ft3. If a material is used that has a lower density, a report must exist and conclude that there is insufficient water flow to transport lightweight caulking, signs, or tags. A report exists and concludes that the ventilation filters and fire barriers in these locations have a density of ≥ 100 lb/ft3.

There are two smart plans for this ITAAC. One is a walk-down, and one is a report review. We should reference this Part 21 in both smart plans.

Eric

-----Original Message-----
From: Musser, Randy
Sent: Thursday, January 15, 2015 7:46 AM
To: Michel(R2), Eric
Subject: RE: Event Notice: 01/14/2015 - Part 21 - CB&I

Do we have any associated ITAAC in CIB3?

-----Original Message-----
From: Michel(R2), Eric
Sent: Thursday, January 15, 2015 6:37 AM
To: Musser, Randy
Subject: RE: Event Notice: 01/14/2015 - Part 21 - CB&I

Interesting one. At least they caught it before installation.

-----Original Message-----
From: Musser, Randy
Sent: Wednesday, January 14, 2015 4:51 PM
To: Heisserer, Jamie; Ernstes, Michael; Fuller, Justin; Donnelly, Patrick; Michel(R2), Eric
Subject: FW: Event Notice: 01/14/2015 - Part 21 - CB&I

-----Original Message-----
From: HOO Hoc
Sent: Wednesday, January 14, 2015 4:48 PM
To: HOO Hoc
Subject: Event Notice: 01/14/2015 - Part 21 - CB&I

If you have any questions, please call the Ops Center.

Headquarters Operations Officer
U.S. Nuclear Regulatory Commission
Phone: 301-816-5100
Fax: 301-816-5151
email: hoo.hoc@nrc.gov

secure e-mail: (b)(6)

Musser, Randy

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B5

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Headquarters Operations Officer
U.S. Nuclear Regulatory Commission
Phone: 301-816-5100
Fax: 301-816-5151
email: hoo.hoc@nrc.gov
secure e-mail: (b)(6)

Issa, Alfred

From: Pannier, Stephen
Sent: Friday, January 16, 2015 9:13 AM
To: Pasquale, Daniel; Prescott, Paul; Kendzia, Thomas; Armstrong, Aaron; Issa, Alfred
Cc: King, Mark
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Here are links to these documents:

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- see attached:

Daniel J. Pasquale,
Sr. Operations Engineer
U.S. NRC, Office of New Reactors
Washington, DC 20555-001
(301) 415-2498 _office
(301) 415-5399_fax

-----Original Message-----
From: Pannier, Stephen
Sent: Thursday, January 15, 2015 8:53 AM
To: Prescott, Paul; Kendzia, Thomas; Armstrong, Aaron; Issa, Alfred; Pasquale, Daniel

B6

Cc: King, Mark
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Phone: 301-816-5100
Fax: 301-816-5151
email: hoo.hoc@nrc.gov
secure e-mail: (b)(6)

Ex. 6

Issa, Alfred

From: Issa, Alfred
Sent: Tuesday, March 31, 2015 1:22 PM
To: Abbott, Coleman
Subject: RE: Periodic Operating Experience Newsletter Article related to the AP 1000 pipe support Part 21 notification

Thanks again

Alfred Issa, P.E.
US NRC
Reactor Operations Engineer
alfred.issa@nrc.gov
(301) 415-5342

From: Abbott, Coleman
Sent: Tuesday, March 31, 2015 1:22 PM
To: Issa, Alfred
Subject: RE: Periodic Operating Experience Newsletter Article related to the AP 1000 pipe support Part 21 notification

The more info the better!

I find this information useful and helpful...no time wasted here

---

From: Issa, Alfred
Sent: Tuesday, March 31, 2015 1:20 PM
To: Abbott, Coleman
Subject: RE: Periodic Operating Experience Newsletter Article related to the AP 1000 pipe support Part 21 notification

Thanks Coleman. Just to be clear, this is not meant to waste your time because we know how busy you guys are. It is rather meant to provide information that you may already know.

Alfred Issa, P.E.
US NRC
Reactor Operations Engineer
alfred.issa@nrc.gov
(301) 415-5342

From: Abbott, Coleman
Sent: Tuesday, March 31, 2015 1:16 PM

B7

To: Issa, Alfred
Subject: RE: Periodic Operating Experience Newsletter Article related to the AP 1000 pipe support Part 21 notification

Ok. I'll pass this on

Coleman B. Abbott
USNRC - Region II
Resident Inspector (Vogtle Units 3 & 4)
coleman.abbott@nrc.gov
Office: 706-437-2542
Cell: (b)(6) Ex. 6
Fax: 706-437-1239

Mailing Address
USNRC-Trailer: Attn Coleman Abbott
7825 River Road
Waynesboro, GA 30830

From: Issa, Alfred
Sent: Tuesday, March 31, 2015 1:15 PM
To: Abbott, Coleman
Subject: RE: Periodic Operating Experience Newsletter Article related to the AP 1000 pipe support Part 21 notification

Please let me know if you guys have any comments and especially updates that I may not be aware of.

Thanks

Alfred Issa, P.E.
US NRC
Reactor Operations Engineer
alfred.issa@nrc.gov
(301) 415-5342

From: Abbott, Coleman
Sent: Tuesday, March 31, 2015 1:14 PM
To: Issa, Alfred
Subject: RE: Periodic Operating Experience Newsletter Article related to the AP 1000 pipe support Part 21 notification

Thanks!!!

From: Issa, Alfred
Sent: Tuesday, March 31, 2015 10:35 AM
To: Abbott, Coleman
Subject: RE: Periodic Operating Experience Newsletter Article related to the AP 1000 pipe support Part 21 notification

I'll forward it to her.

Thank you

Issa, Alfred

From:	Issa, Alfred
Sent:	Tuesday, March 10, 2015 5:58 AM
To:	Monninger, John
Cc:	Downey, Steven; Anderson, Brian (Brian.Anderson@nrc.gov)
Subject:	RE: NEW OpE COMM: Potential for Substantial Safety Hazard Caused by Pipe Support Coating Deviations (AP-1000 Projects)

Yes, it is. I have an outstanding list of events that I consider ConEx candidates and that's one of them. At this time, we're short one FTE so I'm focusing my work on the highest priorities. We will eventually get to ConEx.

Please let me know when you and Steve would like to meet and if you want me to review the latest revision of the report in advance. With the exception of the "Foreword" section which I wrote and the "Introduction" section which I co-wrote, my comments on the report so far have been high level. Also, according to Aurelie one of the US events (an IN that I wrote) has disappeared from the report and she wants it added back.

Thank you

Alfred Issa, P.E.
US NRC
Reactor Operations Engineer
alfred.issa@nrc.gov
(301) 415-5342

From: Monninger, John
Sent: Monday, March 09, 2015 5:00 PM
To: Issa, Alfred
Cc: Downey, Steven
Subject: Re: NEW OpE COMM: Potential for Substantial Safety Hazard Caused by Pipe Support Coating Deviations (AP-1000 Projects)

Al,

Thanks for sending this out. Is this issue a candidate for ConEx? Also, we should get together with Steve to trade notes from last week's WGRNR mtg? We expanded consideration of events for the database a little. Also, I'll want to review the latest report and make sure you align with any comments I have.

John

John

John Monninger
(b)(6)

B8

Musser, Randy

From: Issa, Alfred
Sent: Monday, March 09, 2015 2:31 PM
Subject: NEW OpE COMM: Potential for Substantial Safety Hazard Caused by Pipe Support Coating Deviations (AP-1000 Projects)

Information Security Reminder: OpE COMMs may contain preliminary information, may be pre-decisional and may contain sensitive/proprietary information.
OpE COMMs are not intended for distribution outside the agency.

This email is being sent to notify recipients of a new OpE COMM in ADAMS (**ML 15068A226**)

Potential for Substantial Safety Hazard Caused by Pipe Support Coating Deviations (AP-1000 Projects)

Summary

Chicago Bridge & Iron (CB&I) submitted a Part 21 notification that concluded that the amount of unqualified coating used on pipe supports supplied to the AP 1000 Vogtle Units 3 and 4, and the Summer Units 2 and 3 construction sites could have eventually caused impairment of the long-term cooling function during events that require that capability by increasing the debris clogging the sump strainers thus reducing the flow. Therefore, if left uncorrected, this condition could have caused a substantial safety hazard for these plants. See Generic Issue (GI)-191, "Assessment of Debris Accumulation on PWR Sump" for more information.

This OpE COMM is being distributed to the following groups:

Containment; ECCS; Human Performance; Inspection Programs; New Reactors; Pump & Valve Performance; QA & Vendor Issues; Structural; All COMMs

To unsubscribe from this distribution list, or to subscribe to a different list in the OpE Community, please contact Joe Giantelli

For more information on the Reactor OpE Program, please visit our SharePoint site.

Thank you reviewing and using Operating Experience.

Alfred Issa, P.E.
US NRC
Reactor Operations Engineer
alfred.issa@nrc.gov
(301) 415-5342

B9

Ex. 5

OpE COMM

Operating Experience Communication

Date Released: 3/4/2015

Date Revised: 04/08/2015

Good Judgment Comes from Experience

(b)(5)

(b)(5)

(b)(5)

(b)(5)

Issa, Alfred

From: Issa, Alfred
Sent: Tuesday, March 31, 2015 1:22 PM
To: Abbott, Coleman
Subject: RE: Periodic Operating Experience Newsletter Article related to the AP 1000 pipe support Part 21 notification

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US NRC
Reactor Operations Engineer
alfred.issa@nrc.gov
(301) 415-5342

From: Abbott, Coleman
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To: Issa, Alfred
Subject: RE: Periodic Operating Experience Newsletter Article related to the AP 1000 pipe support Part 21 notification

The more info the better!

I find this information useful and helpful...no time wasted here

From: Issa, Alfred
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Alfred Issa, P.E.
US NRC
Reactor Operations Engineer
alfred.issa@nrc.gov
(301) 415-5342

From: Abbott, Coleman
Sent: Tuesday, March 31, 2015 1:16 PM

B10

To: Issa, Alfred
Subject: RE: Periodic Operating Experience Newsletter Article related to the AP 1000 pipe support Part 21 notification

Ok. I'll pass this on

Coleman B. Abbott
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Resident Inspector (Vogtle Units 3 & 4)
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Mailing Address
USNRC-Trailer: Attn Coleman Abbott
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Please let me know if you guys have any comments and especially updates that I may not be aware of.

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I'll forward it to her.

Thank you

Alfred Issa, P.E.
US NRC
Reactor Operations Engineer
alfred.issa@nrc.gov
(301) 415-5342

From: Abbott, Coleman
Sent: Tuesday, March 31, 2015 10:21 AM
To: Issa, Alfred
Cc: Fuller, Justin
Subject: RE: Periodic Operating Experience Newsletter Article related to the AP 1000 pipe support Part 21 notification

Thanks!

Also, please add Sarah Temple (VEGP 3/4 Resident Inspector) to distribution.

Coleman B. Abbott
USNRC - Region II
Resident Inspector (Vogtle Units 3 & 4)
coleman.abbott@nrc.gov
Office: 706-437-2542
Cell: (b)(6) EX.6
Fax: 706-437-1239

Mailing Address
USNRC-Trailer: Attn Coleman Abbott
7825 River Road
Waynesboro, GA 30830

From: Issa, Alfred
Sent: Tuesday, March 31, 2015 10:13 AM
To: Brown, Michael; Johnson, Andrea; Fuller, Justin; Harmon, David; Anderson, Brian; Abbott, Coleman
Cc: Thomas, Eric; Kavanagh, Kerri; Roach, Edward
Subject: Periodic Operating Experience Newsletter Article related to the AP 1000 pipe support Part 21 notification

Please review the attached Periodic Operating Experience Newsletter Article related to the CB&I pipe support coating Part 21 notification and let me know if you have any comments or inputs by COB April 3rd, 2015. This is an internal article with the audience being the NRC staff at large.

Eric,

In addition, please let me know if you would like me to adjust the length of the article.

Thank you

Al

~~NOTE: THIS SUMMARY IS OFFICIAL USE ONLY~~
~~***MAY CONTAIN SENSITIVE/ PROPRIETARY OR NRC INTERNAL USE ONLY INFORMATION***~~
~~DO NOT FORWARD ANY PORTIONS OUTSIDE OF NRC WITHOUT FIRST OBTAINING PERMISSION FROM ORIGINATOR~~

OpE Forum Postings (COMMS): One (1)

1) CB&I NUCLEAR - PART 21 REPORT REGARDING DEVIATIONS OF COATINGS FOR PIPE SUPPORTS FOR AP1000 PROJECTS

See Part 21 Reports 2014-0076-00, 2014-0076-01 and 2014-0076-02 for details. The vendor submitted a Part 21 report after their evaluation concluded that the use of the incorrect coating inside containment impacts debris generation and long-term cooling analyses performed for the AP1000 design. It is estimated that the amount of unqualified IOZ coating that could have been added to the containment would have eventually caused impairment of the long-term cooling function during events that require that capability. Therefore, if left uncorrected this condition could have caused a substantial safety hazard for the V. C. Summer and Vogtle AP1000 nuclear projects. Draft and post an OpE COMM related to this Part 21 Report (Assigned to Al Issa). Post the COMM to the following Groups: ALL COMMS, CHEM/CHEM ENG, CONTAINMENT, ECCS, INSP PROGRAMS, MAT'LS/AGING, NRO and QA/VENDOR. Also send to TRG Leads for QA & Vendor (Paul Prescott / Thomas Kendzia / Aaron Armstrong), NRO (Al Issa) and to SSIB Containment Sump POC (Stewart Bailey). Assigned to Steve Pannier.

Follow-up/Other Tasks: Ten (10)

[Note - The information in this part of the Summary is often preliminary in nature and is provided to help IOEB staff communicate and track noteworthy items being followed up by either the Regions or HQ staff.]

Outside of Scope

B11

Outside of Scope

Outside of Scope

Outside of Scope

3) CB&I NUCLEAR - PART 21 REPORT REGARDING DEVIATIONS OF COATINGS FOR PIPE SUPPORTS FOR AP1000 PROJECTS

See Part 21 Reports 2014-0076-00, 2014-0076-01 and 2014-0076-02 for details. The vendor submitted a Part 21 report after their evaluation concluded that the use of the incorrect coating inside containment impacts debris generation and long-term cooling analyses performed for the AP1000 design. It is estimated that the amount of unqualified IOZ coating that could have been added to the containment would have eventually caused impairment of the long-term cooling function during events that require that capability. Therefore, if left uncorrected this condition could have caused a substantial safety hazard for the V. C. Summer and Vogtle AP1000 nuclear projects.

Draft and post an OpE COMM related to this Part 21 Report (Assigned to Al Issa). Post the COMM to the following Groups: ALL COMMS, CHEM/CHEM ENG, CONTAINMENT, ECCS, INSP PROGRAMS, MAT'LS/AGING, NRO and QA/VENDOR. Also send to TRG Leads for QA & Vendor (Paul Prescott / Thomas Kendzia / Aaron Armstrong), NRO (Al Issa) and to SSIB Containment Sump POC (Stewart Bailey). Assigned to Steve Pannier.

Outside of Scope

Outside of Scope

Outside of Scope

Outside of Scope

7) CB&I NUCLEAR - PART 21 - INTERIM REPORT REGARDING TRENDS IN WELDING AND DOCUMENTATION ISSUES FOR VOGTLE UNITS 3 AND 4 AP1000 PROJECT.

See Part 21 report 2015-0002-00 for details.

The vendor provided an interim report in accordance with 10 CFR 21.21 pertaining to a trend in welding and documentation issues for the Vogtle AP10000 project construction.
The vendor's evaluation for reportability in accordance with 10 CFR Part 21 was not able to be

completed within the 60-day evaluation period due to the need to complete a root cause analysis of the identified conditions. It is currently expected that the evaluation of these conditions will be completed by February 5, 2015. Send to TRG Leads for QA & Vendor (Paul Prescott / Thomas Kendzia / Aaron Armstrong), Primary Materials / Vessels and Welding (Keith Hoffman) and to NRO (Al Issa). Assigned to Steve Pannier.

8) CB&I NUCLEAR - INTERIM 10 CFR PART 21 REPORT REGARDING SUBMODULE CAO1-15 NONCONFORMANCES FOR V.C. SUMMER UNIT 2 AP1000® PROJECT

See Part 21 report 2015-0003-00 for details.

The vendor provided an interim report in accordance with 10 CFR 21.21 pertaining to submodule CAO1-15 supplied by CB&I Lake Charles for the V.C. Summer Unit 2 AP1000® nuclear project. Based on information in quality assurance inspection reports, some nonconforming structural welds were found and some reinforcing steel component nonconformances were also found on this submodule. Evaluation of reportability in accordance with 10 CFR Part 21 was not able to be completed within the 60-day evaluation period due to the recent discovery that the initial review of these conditions incorrectly concluded that the receipt documentation had not yet been received. A corrective action report has been initiated for the failure to complete the evaluation within the required timeframe. It is currently expected that the evaluation of this condition will be completed by March 10, 2015. Send to TRG Leads for QA & Vendor (Paul Prescott / Thomas Kendzia / Aaron Armstrong), Primary Materials / Vessels / Welding (Keith Hoffman) and to NRO (Al Issa). Assigned to Steve Pannier

Outside of Scope

Outside of Scope

(i.e., Screened /reviewed against LIC-401 criteria for initiating an "Issue for Resolution" (IFR), which is IOEB's process for conducting further evaluation of an issue to determine what, if any, additional actions should be taken to communicate and organizationally learn from OpE.)

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~~PERMISSION FROM ORIGINATOR~~

From:	Castell, Curtis
To:	HOO Hoc
Subject:	Part 21 Notification Chicago Bridge & Iron
Date:	Wednesday, January 14, 2015 1:36:54 PM
Attachments:	image001.png 1342_001.pdf NRC Letter Part 21 January 13 2015 pipe support coatings.doc

Attached to this e-mail please find a scanned Adobe® pdf copy of a report being provided as a Part 21 notification by Chicago Bridge and Iron. Additionally, a copy of the report in the native file Word® document format is also provided for your convenience.

Please let me know if you have any questions.

Thank you,

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B12

Part 21 (PAR) Event # 50734

Rep Org: CB&I NUCLEAR		**Notification Date / Time:** 01/14/2015 14:10	(EST)
Supplier: CB&I NUCLEAR		**Event Date / Time:** 01/13/2015	(EST)
		Last Modification: 01/14/2015	
Region: 1	**Docket #:**		
City: CHARLOTTE	**Agreement State:**	Yes	
County:	**License #:**		
State: NC			
NRC Notified by: CURTIS CASTELL	**Notifications:**	RANDY MUSSER	R2DO
HQ Ops Officer: STEVE SANDIN		PART 21 GROUP	EMAIL
Emergency Class: NON EMERGENCY			
10 CFR Section:			
21.21(d)(3)(i) DEFECTS AND NONCOMPLIANCE			

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

The following report was received via email:

"This report is being provided in accordance with 10 CFR 21.21.

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

"Michael Hickey
CB&I Nuclear
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.

"The basic components being supplied are pipe supports to be used inside the containment for the V. C. Summer and Vogtle AP1000 nuclear projects. The pipe supports are classified as ASME B31.1 Code and Quality Assurance (QA) Categories II and III. These supports are associated with various non-safety-related portions of several systems inside containment, including Component Cooling, Passive Core Cooling, Spent Fuel Pool Cooling, Waste Liquid, and others. The material being procured was not basic component materials and 10 CFR Part 21 was not applicable. The basic component aspect became inadvertently introduced based on the decision to use a coating that was based on inorganic zinc (IOZ) in lieu of the appropriate coating, which is a Self-Priming High Solids Epoxy (SPHSE). Use of the IOZ coating required the application to be performed as a safety-related

application. Due to misinterpretation of the design specification requirements, the wrong safety-class was invoked and the wrong coating material was selected. The piping supports are not impacted by this use of the IOZ coating and would have not been impacted for meeting the pipe support design function. The use of the incorrect coatings, with the incorrect safety classification, could have impacted the ability of the required systems to perform the long-term cooling function, which is considered a safety-related functional impact. The approximate number of supports that are impacted for each unit is provided as follows: 952 Vogtle Unit 3, 275 Vogtle Unit 4, 967 V. C. Summer Unit 2, and 625 V. C. Summer Unit 3.

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

"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 procurement documents. Subsequent review has determined that the procurement documents specified incorrect information for many of the supports, which should have been coated with a different material. The procurement documentation was provided to the supplier by CB&I Power, 128 South Tryon Street Charlotte, NC 28202.

"(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.

"The use of the incorrect coating inside containment impacts debris generation and long-term cooling analyses performed for the AP1000 design. It is estimated that the amount of unqualified IOZ coating that could have been added to the containment would have eventually caused impairment of the long-term cooling function during events that require that capability. Therefore, if left uncorrected this condition could have caused a substantial safety hazard for the V. C. Summer and Vogtle AP1000 nuclear projects.

"(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. Interim Part 21 reports dated October 15, 2014, and December 11, 2014, were submitted to the NRC.

"(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.

"The impacted materials are pipe supports with incorrect coatings intended to be used inside containment for the V. C. Summer and Vogtle AP1000 nuclear projects. The approximate number of supports that are impacted for each unit is provided as follows: 952 Vogtle Unit 3, 275 Vogtle Unit 4, 967 V. C. Summer Unit 2, and 625 V. C. Summer Unit 3.

"(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.

"The nonconforming pipe supports were initially placed into a hold status and are being corrected. A corrective action report (CAR 2014-2574) has been entered in the CB&I Power Corrective Action Program that describes the circumstances that led to the identification of this potential substantial safety hazard. That CAR is identified as a Level 1, significant condition adverse to quality, and a root cause analysis of the condition is required by CB&I Power Corrective Action Program. The actions necessary to correct the identified conditions and the causes for these conditions will be established and tracked to completion under the CB&I Power Corrective Action Program.

"(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.

"The condition was discovered by CB&I Power prior to installation of the affected components and the components are being corrected. Therefore, there is no additional action or advice needed for the licensees at this time. The condition has also been evaluated by CB&I Power for potential 10 CFR 50.55(e) reporting by the affected

combined operating license holders. CB&I Power has recommended to the licensees that this condition is reportable under 10 CFR 50.55(e).

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

"Not applicable.

"This condition was previously identified by interim report letters dated October 15, 2014 [ML14296A427 - Log No. 2014-76-00], and December 11, 2014.

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

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