

March 9, 2016

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

SUBJECT: UPDATED 10 CFR PART 21 REPORT REGARDING DEVIATIONS OF PIPING  
PENETRATION SLEEVES FOR AP1000® PROJECTS

By letter dated February 2, 2016, WECTEC provided a report in accordance with 10 CFR 21.21 pertaining to deviations of piping penetration sleeves for Vogtle Unit 4 and V. C. Summer Unit 3 AP1000® projects. This report is identified as NRC Log No. 2015-86-01, Accession No. ML16039A257.

During the review of documentation associated with root cause analysis being performed for the identified conditions, it was determined that four (4) affected penetrations were inadvertently omitted from the basic components list in the report submitted by letter dated February 2, 2016. The attached report is provided to correct and update that list.

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

Sincerely,



Deborah A. Gustafson  
Vice President of Engineering  
WECTEC LLC

cc: Regional Administrator, USNRC, Region II

Attachment

IE19  
NRD

UPDATED 10 CFR PART 21 REPORT REGARDING DEVIATIONS OF PIPING  
PENETRATION SLEEVES FOR AP1000® PROJECTS

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

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

Deborah A. Gustafson  
Vice President of Engineering  
WECTEC LLC  
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 piping penetration sleeves intended to be used for fabrication of the CA01 structural modules for the V. C. Summer Unit 3 and Vogtle Unit 4 AP1000® projects. The piping penetration sleeves are steel cylinders used to form wall openings that allow piping systems to pass through the structural module walls. The following list is the identified nonconforming penetrations for V. C. Summer Unit 3 (VS3) and Vogtle Unit 4 (SV4):

SV4-11202-ML-P01-1  
SV4-11202-ML-P02-1  
SV4-11300-ML-P37-1  
SV4-11403-ML-P02-1  
SV4-11403-ML-P03-1  
SV4-11403-ML-P01-1  
SV4-11403-ML-P08-1  
VS3-11202-ML-P01-1  
VS3-11202-ML-P02-1  
VS3-11403-ML-P02-1  
VS3-11403-ML-P01-1  
VS3-11403-ML-P03-1

Additionally, during the review of documentation associated with root cause analysis being performed for the identified conditions, it was determined that four (4) affected penetrations were inadvertently omitted from the basic components list. In addition to the identification of corrosion, one penetration was found to have several dents and another was found with scratches. These additional four (4) penetrations are:

SV4-11303-ML-P06-1  
VS3-11303-ML-P06-1

VS3-11300-ML-P37  
SV4-11303-ML-P05

The listed piping penetration sleeves are associated with various systems, including the Reactor Coolant, Chemical and Volume Control, Primary Sampling, and the Normal Residual Heat Removal Systems.

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

The wall piping penetration sleeve material was supplied by CB&I Power (now WECTEC LLC) to IHI Corporation in Japan for the fabrication of CA01 structural modules. WECTEC LLC is located at 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.

During inspection of the listed piping penetration sleeves, corrosion was found. Additionally, one penetration was found to have several dents and another penetration had scratches. It has been conservatively determined that the penetrations could have failed if they were used in the corroded condition. Therefore, it is conservatively concluded that if left uncorrected this condition could have caused a substantial safety hazard for the V. C. Summer and Vogtle AP1000® projects.

The nonconformances were found during planned receipt inspections for purchaser-supplied material at IHI Corporation in Japan. Therefore, the conditions were discovered prior to use of the material. The conclusion that this condition is reportable is based on the delivery of basic components that were nonconforming and these basic components were intended for use in fabrication of safety-related structural wall modules for the V. C. Summer Unit 3 and Vogtle Unit 4 AP1000® projects.

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

The discovery dates of these deviations is based on the dates of the associated CB&I Power (now WECTEC LLC) Nonconformance & Disposition Reports (N&D). The earliest N&D was initiated on October 9, 2015.

(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 wall piping penetration sleeves intended to be used for fabrication of the CA01 structural modules for the V. C. Summer Unit 3 and Vogtle Unit 4 AP1000® projects.

The wall piping penetration sleeves are steel cylinders used to form wall openings that allow piping systems to pass through the structural module walls.

(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 wall piping penetration sleeves have been identified as nonconforming, tags have been placed on the material, and the penetrations are being held pending the resolution of the N&Ds. A corrective action report (CAR 2016-0427) has been entered in the WECTEC LLC Corrective Action Program that describes the circumstances that led to the identification of this potential substantial safety hazard. The actions necessary to correct the identified conditions and the causes for these conditions will be established and tracked to completion under the WECTEC LLC 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 during receipt inspection being performed at IHI in Japan, prior to installation of the affected components. Therefore, there is no additional action or advice needed for the licensees at this time.

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

Not applicable.