

February 15, 2017

Ms. Lynn A. Skarin, Quality Assurance Manager  
Pentair Valves & Controls  
Anderson Greenwood Crosby  
55 Cabot Blvd.  
Mansfield, MA 02048

SUBJECT: PENTAIR VALVES & CONTROLS RESPONSE TO THE U.S. NUCLEAR  
REGULATORY COMMISSION INSPECTION REPORT NO. 99901431/2016-201  
AND NOTICE OF NONCONFORMANCE

Dear Ms. Skarin:

Thank you for your February 3, 2017, letter in response to the Notice of Nonconformance (NON) that were discussed in the subject U.S. Nuclear Regulatory Commission (NRC) inspection report (IR).

We have reviewed your letter and found that it was responsive and acceptable in regards to one of the examples discussed in IR No. 99901431/2016-201. However, there are examples within this NON that require clarification and additional information. Specifically, Pentair's response to:

Example No. 2 of NON 99901431/2016-201-01 related to Neolube 1, stated that Pentair has initiated CAR No. 974 to document additional planned corrective actions which was not originally addressed in CAR No. 666 for NON 99901431/2013-201-04. Pentair stated that within that response, Pentair Engineering had identified 40 cleaning procedures and 17 assembly procedures to be revised in order to clarify the use of Neolube 1 for nuclear applications. Pentair further stated that CAR No. 974 will remain in open status until 1) all identified procedures have been revised and, 2) all of the Engineering and assembly personnel have been trained accordingly. However, your response failed to explain Pentair's actions to ensure that access to Neolube 1 material is controlled to prevent its use in nuclear application. Also, since the 40 cleaning procedures and 17 assembly procedures were available for use, your response failed to explain what actions Pentair will take to ensure that no Neolube 1 was used since 2013 by the assembly/testing personnel. Please clarify your response to address these concern.

Example No. 3 of NON 99901431/2016-201-01 related to elastomer suppliers, stated that Pentair has initiated a CAR No. 978 to address the lack of implementation of corrective action on original CAR No. 709 for NON 99901431/2013-05. Pentair stated its original planed corrective action under CAR No. 709 that Pentair planned to apply Method 3 of EPRI NP5652 to verify the supplier's capability to control material traceability to a heat number, production lot number or batch control. Pentair stated that it will conduct commercial-grade surveys of its supplier's quality program to verify if the supplier's quality program is capable of appropriate control of required critical characteristics, including material traceability and adequacy of Certificate of Conformance or Certified Material Test Reports. However, your response failed to

explain what actions Pentair will take to ensure commercial elastomer suppliers have appropriate control of the required critical characteristics including, but not limited to materials verification, lot/batch control, traceability, test methods, calibration of measuring and test equipment, and adequacy of Certificate of Material Test Reports. Please clarify your response to address these concerns.

Please provide a response within 30 days of this letter. The agency will consider extending the response time if you show good cause for us to do so.

In accordance with 10 CFR 2.390 "Public Inspections, Exemptions, Requests for Withholding," of the NRC's "Rules of Practice," a copy of this letter, its enclosure(s), and your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System, accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request that such material is withheld from public disclosure, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21 "Protection of Safeguards Information: Performance Requirements."

Please contact Mr. Raju Patel at 301-415-33511, or via electronic mail at [raju.patel@nrc.gov](mailto:raju.patel@nrc.gov), if you have any questions or need assistance regarding this matter.

Sincerely,

***/RA Jonathan Ortega-Luciano Acting for/***

John P. Burke, Chief  
Quality Assurance Vendor Inspection Branch-2  
Division of Construction Inspection  
and Operational Programs  
Office of New Reactors

Docket No.: 99901431

Letter to Lynn Skarin from John P. Burke dated February 15, 2017

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<b>OFFICE</b>	NRO/DCIP	NRO/DCIP
<b>NAME</b>	RPatel	JBurke (JOrtega-Luciano for)
<b>DATE</b>	02/13/17	02/15/17

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