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REPLY TO A NOTICE OF NONCONFORMANCE

March 15, 2017

U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

ATTN : Document Control Desk

Subject: Reply to Notice of Nonconformance
NRC Inspection Report No. 99901431/2016-201
Nonconformance 99901431/2016-201-01

Dear Sir,

The following is in response to your letter dated February 15, 2017 requesting clarification and additional information to Pentair's Reply to a Notice of Nonconformance dated February 3, 2017.

Example No. 2 of Nonconformance 99901431/2016-201-01:

In 2013, Pentair had initiated CAR 666 for NON 99901431/2013-201-04 to establish controls to prevent use of Neolube 1 in nuclear applications. Under CAR 666 dated 6/27/2013, the original planned corrective action was to a) locate and label all Neolube 1 bottles with a tag stating for "Navy Use Only," b) train all assembly personnel regarding the use of Neolube 1 and that its use is restricted to Navy applications only, and c) train Manufacturing Supervisor to monitor and label all new incoming shipments of Neolube 1 prior to disbursement.

Pentair confirms that the original planned corrective actions as noted in CAR 666 are still being effectively implemented today and that there have been no Neolube 1 containers located or used within the Nuclear assembly/test area of the shop. Pentair utilizes Never-Seez "Nickel Nuclear Grade" as the preferred lubricating compound within our nuclear pressure relief valve applications. This type/brand of lubricant is currently specified within all Assembly and Cleaning procedures as an acceptable lubricant for use.

As indicated in Pentair's Reply to a Notice of Nonconformance dated February 3, 2017, new Corrective Action Request 974 was initiated to track the revision of the 57 identified assembly and cleaning procedures which currently reference "Neolube" with no specific part number or model number designator. All procedures are being evaluated by engineering on a case by case basis to determine whether the appropriate action will be to remove reference to "Neolube" from the procedure or to

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revise the reference from "Neolube" to "Neolube 1260" to allow and acceptable alternative lubricant where required. Note that Neolube 1260 was previously confirmed with the lubricant manufacturer (Huron Industries) to be acceptable for use in containment as well as secondary side nuclear applications.

As stated under the original planned correction action from CAR 666, Pentair has also confirmed that all used and unused container's of Neolube 1 located within the Navy Valve Assembly area and/or within the storage cabinets are labelled with "Navy Use Only" therefore restricting its use to Navy applications.

Example No. 3 of Nonconformance 99901431/2016-201-01:

Pentair's response to NON 99901431/2016-201-01 dated February 3, 2017, erroneously stated that Pentair would be utilizing Method 3 of EPRI NP5652 to verify the supplier's capability to control material traceability to a heat number, production lot number or batch number. To clarify, Pentair will instead apply Method 2 of EPRI NP5652 and conduct a commercial grade survey of the supplier to verify that the supplier's quality program has appropriate controls in place for traceability of production lot number or batch control as well as verify the adequacy of the supplier's Certificate of Conformance. Verification of all other critical characteristics established for elastomer components such as visual, dimensional and hardness inspections, material verifications as well as calibration of measuring and test equipment will be conducted under Pentair's 10CFR50 Appendix B dedication program, Supplement 6 to Quality Assurance Manual QC-110.

If you should have any questions please feel free to contact me at (508) 594-4450 or by email: lynn.skarin@pentair.com

Regards,



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Cc: John Burke, Chief
Quality Assurance Vendor Inspection Branch-2
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