



Nuclear Sensors & Process Instrumentation

Round Rock, Texas, USA / www.ultra-nspi.com

Ultra Electronics, Nuclear Sensors & Process Instrumentation is a business name of Weed Instrument Co., Inc.

October 27, 2017

10CFR21

ATTN: Document Control Clerk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-001

Subject: 10CFR21 Interim Report – Review of design changes to the commercially purchased Schneider I/A pressure transmitter

Ultra Electronics, NSPI procures the I/A pressure transmitter product from Schneider as commercial grade where the manufacturer has design responsibility/authority. In order to maintain the seismic qualification, all design changes made by the manufacturer are required to be evaluated by Ultra Electronics, NSPI to determine impact to the qualification. This evaluation is documented in a summary report.

On August 22, 2017, during preparations for the Ultra Electronics, NSPI triennial commercial grade survey of Schneider, Ultra Electronics, NSPI Quality Assurance (QA) personnel discovered that Ultra Electronics, NSPI had provided transmitters under the seismic qualification after the latest revision date of the summary document. The summary document was not revised to indicate that the design change evaluation was performed prior to shipment. Due to this omission, 10CFR Part 21 was imposed on these orders. Ultra Electronics, NSPI internal 10CFR21 Program documents have been created to document this issue, and the engineering evaluation of the reported condition is on-going.

Ultra Electronics, NSPI concluded that the lapse in manufacturer design change review could constitute a possible reportable condition pursuant to 10CFR21, "Reporting of Defects and Noncompliance", and, as such, required additional evaluation. However, this evaluation is not expected to be complete until November 17, 2017. Pursuant to the reporting requirements of 10CFR21.21(a)(2), if the evaluation of the deviation or failure to comply potentially associated with a substantial safety hazard cannot be completed within 60 days (i.e., October 21, 2017), an interim report must be submitted to the NRC. The enclosure to this letter provides information required by 10CFR21.21(a)(2) for the interim report of this condition. An internal Corrective Action Request (1576) has been issued to Ultra Electronics, NSPI Engineering to ensure subsequent interim reports are delivered within the 60 day limit.

Regards,

Adam Gaither
Vice President, Engineering
Ultra Electronics, NSPI

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ENCLOSURE

10CFR21 Interim Report – Review of design changes to the commercially purchased Schneider I/A pressure transmitter

Name and Address of the Individual Making the Interim Report:

Mr. Adam Gaither
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Description of the Deviation or Failure to Comply that is being evaluated:

Ultra Electronics, NSPI failed to perform an evaluation of manufacturer design changes prior to supplying I/A series transmitters under a previous seismic qualification.

Evaluation Status:

Ultra Electronics, NSPI has obtained all drawing/part revisions from the last revision date of the summary document to present. Ultra Electronics, NSPI is currently evaluating the design changes for potential impacts to the seismic qualification.

Completion of the Evaluation:

The evaluation is expected to be completed on or before November 17, 2017