



531 Flanders Filters Road, Washington, NC 27889-7805
800.637.2803 | flanderscorp.com

June 20, 2018

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

Subject- Unapproved Design Change in a High Efficiency Particulate Air Filter

The letter provides notification and interim information concerning an evaluation being performed by AAF Flanders. §21.21(a)(1).

An evaluation is underway for filters that underwent a non-approved design change. AAF Flanders has determined that an evaluation cannot be completed within the 60 day period. Discovery of the potential deviation was May 2, 2018.

The information required for the 60-Day Interim Report Notification §21.21(a)(2) is provided in the enclosure. We anticipate that the evaluation will be completed by Sept 15, 2018

If you have questions, please feel free to contact me at (502) 637-0429.

Sincerely,

A handwritten signature in black ink, appearing to read 'Shawn Windley', written in a cursive style.

Shawn Windley
Vice President of Product Engineering
AAF International
200 Patrol Road Suite 100
Jeffersonville, Indiana 47130

Enclosure:

60-Day Interim Report Notification Information §21.21(a)(2)

cc:

Russell Ipock, AAF Flanders
Obe Worthington, AAF Flanders
Brian Martz, AAF Flanders
Jay Colwell, Xcel Energy



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Enclosure

60-Day interim Report Notification Information per §21.21(a)(2)



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Enclosure Page 1 of 2

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

Shawn Windley
Vice President of Product Engineering
AAF International
200 Patrol Road Suite 100
Jeffersonville, Indiana 47130

Obe Worthington
Quality Assurance Manager
AAF Flanders
Flanders Filters Road
Washington, NC 27889

(ii) Identification of the facility, the activity, or basic component supplied for such facility which fails to comply or contains a defect.

AAF Flanders is evaluating a potential nonconforming condition associated with filters (model number 0-007-C-42-03-NU-11-13-GG FU5) supplied to Prairie Island Nuclear Generating Plant (PINGP)/ Xcel Energy.

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

This is an interim report and there has not been a determination of a defect in a basic component.

The subject filters were supplied by AAF Flanders to PINGP.

(iv) Nature of defect of failure to comply and the safety hazard which is created or could be created by such defect or failure to comply.

This is an interim report and there has not been a determination of a defect in a basic component.

AAF Flanders is evaluating the subject filters where an unapproved design change for a filter component (urethane) was introduced in the manufacturing process. It was determined that the urethane utilized to seal the filter media to the filter frame casing was not the same urethane utilized when testing for qualification occurred, thus, making it a non-qualified design. Testing will be provided by an approved testing facility to comply with ASME AG-1 Section FC-5000 requirements and the filter design, when proven to be acceptable will be placed on the Qualified Products List with filters containing the new urethane.

(v) The date on which the information of such defect or failure to comply was obtained.
The deviation was identified May 2, 2018.

Enclosure Page 2 of 2

- (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 40 filters were supplied to Prairie Island Nuclear Generating Plant (PINGP) 1717 Wakonade Drive, East Welch, MN. No other filters having non-qualified design was delivered, installed or used by any other site or facility subject to the regulations of the commission.

- (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

This is an interim report and there has not been a determination of a defect in a basic component.

1. Notification was provided to PINGP by AAF Flanders of the potential defect via Notification Letter dated May 3, 2018. This notification was for filters with unqualified urethane material on PO #4000003797.
 2. AAF Flanders CAR #0039 was issued 5/3/2018.
 3. There was a follow-up email correspondence sent May 8, 2018 by AAF Flanders requesting Xcel Energy immediately return of the product that was supplied on PO # 4000003797
 4. A Returned Material Authorization (RMA) # 990831 was issued on 5/10/2018
 5. Xcel Energy issued Supplier Finding Report 2018-0076-01 on 5/10/2018
 6. AAF Flanders issued nonconforming report #1124 on 5/10/2018.
 7. The filters were recalled and arrived back at the AAF Flanders' Manufacturing facility 5/31/2018.
 8. Testing and qualification in accordance with ASME AG-1 is ongoing using the new design (urethane) and will be completed by Sept 15, 2018
- (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.

None

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

Not applicable

From: Windley, Shawn
To: Hoc, HOO.X
Cc: Ipock, Russell; Worthington, Obe; Martz, Brian
Subject: [External_Sender] Unapproved Design Change in a High Efficiency Particulate Air Filter
Date: Wednesday, June 20, 2018 8:39:24 PM
Attachments: Excel Energy_062018.pdf

To whom it may concern,

U.S Nuclear Regulatory Commission
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The information required for the 60-Day Interim Report Notification §21.21(a)(2) is provided in the enclosure. We anticipate that the evaluation will be completed by Sept 15, 2018

Thank you and best regards,
Shawn

Shawn Windley
Vice President, Product Engineering
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