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To: [Hoc, HOO X](#)
Cc: [Les Taggart](#); [Nick Jose](#); [Steven Redman](#)
Subject: [External_Sender] Initial Notification - P21-06102021-IN
Date: Thursday, June 10, 2021 15:56:48
Attachments: [image001.jpg](#)
[P21-06102021-IN Initial Notification of a deviation.pdf](#)

Please see the attached Initial Notification of a deviation that has been identified for the NLI 280-ton Custom Chillers, Serial Numbers XHX-0001A / XHX-0001B / XHX-0001C. The Chillers were originally supplied by Nuclear Logistics under PO: NU-02SR726683 in 2010.

Regards,

Tracy Bolt

Chief Nuclear Officer, CNO

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To: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555
Fax Number (301)816-5151

10CFR Part 21 Initial Notification: P21-06102021-IN

Subject: Deviation Identified in the Bolting Utilized to Maintain Seismic Qualification

Pursuant to 10CFR 21.21 (d)(3)(i), Paragon Energy Solutions is providing initial notification of the identification of a deviation.

Condition that requires evaluation:

NLI 280-ton Custom Chillers, Serial Numbers XHX-0001A / XHX-0001B / XHX-0001C.
The Chillers were originally supplied by Nuclear Logistics under PO: NU-02SR726683 in 2010.

The original seismic qualification was questioned by plant personnel related to the size of the bolting utilized for the diagonal cross braces on the two lower chiller frames. Paragon performed a review and additional analysis of the original qualification report. It was confirmed that the bolting which was utilized to install the pinned diagonal braces on the condenser and compressor frame sections does not have a sufficient load bearing capacity to support the application loading during a seismic event.

The upset and emergency loading for the diagonal brace is 5.59 kip and 8.59 kip, respectively. Compared to the load capacity of 2.32 kip and 3.09 kip for upset and emergency, respectively, for the 3/8" bolt in single-shear configuration with threads included in the shear plane.

This condition does not affect normal operation of the chiller. However, this deviation has the potential to impact the ability to maintain structural integrity during a seismic event.

Date of Discovery: 6/8/2021

Formal notification will be submitted on or before 7/8/2021.

Please contact me with any questions or comments.

Regards,

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