



Engine Systems, Inc.

Part 21 from a Vendor Perspective



ESI – Rocky Mount, NC



- ▶ ESI QA Program
- ▶ 10CFR50 Appendix B
- ▶ NQA-1
- ▶ 10CFR Part 21



ESI is:

- ▶ A Supplier of Basic Components
- ▶ The OEM rep for 5 Brands of Emergency Diesel Generators (EDG)
 - ▶ Mostly Commercial Grade Dedication
 - ▶ Some Design/Manufacture



10CFR 21.2 (a)(2)

- ▶ (2) Each individual, corporation, partnership, or other entity doing business within the United States, and each director and responsible officer of such an organization, that constructs a production or utilization facility licensed for manufacture, construction, or operation under parts 50 or 52 of this chapter,... or supplies basic components for a facility or activity licensed, other than for export, under parts 30, 40, 50, 52, 60, 61, 63, 70, 71, or part 72 of this chapter



For ESI's Perspective, Let's Zoom Out for a Moment



What is our goal as a society?

- ▲ Reliable Power
- ▲ Clean Power
- ▲ On Demand Power
- ▲ Public Safety



ESI's role

- ▲ To Understand the Regulation
- ▲ To Understand Other Players' Roles
- ▲ To Diligently Look for, Evaluate, and Notify

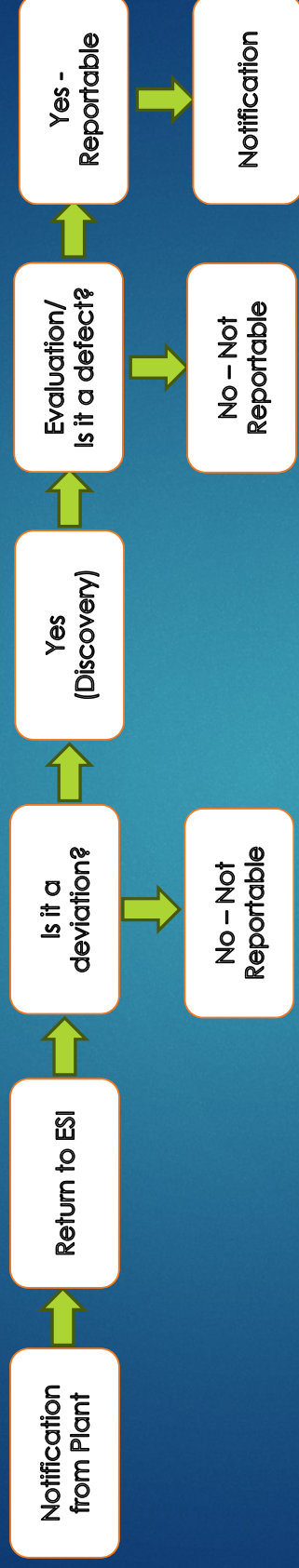


ESI's role

- ▶ Commercial Vendors
- ▶ With few exceptions, discoveries are originated with ESI or it's customers (licensees)



How It Typically Works at ESI





Evaluation

How do we know that any given deviation could create a substantial safety hazard?

EDGs are Safety Related

If the deviation puts the diesel generator at risk, then it is Reportable



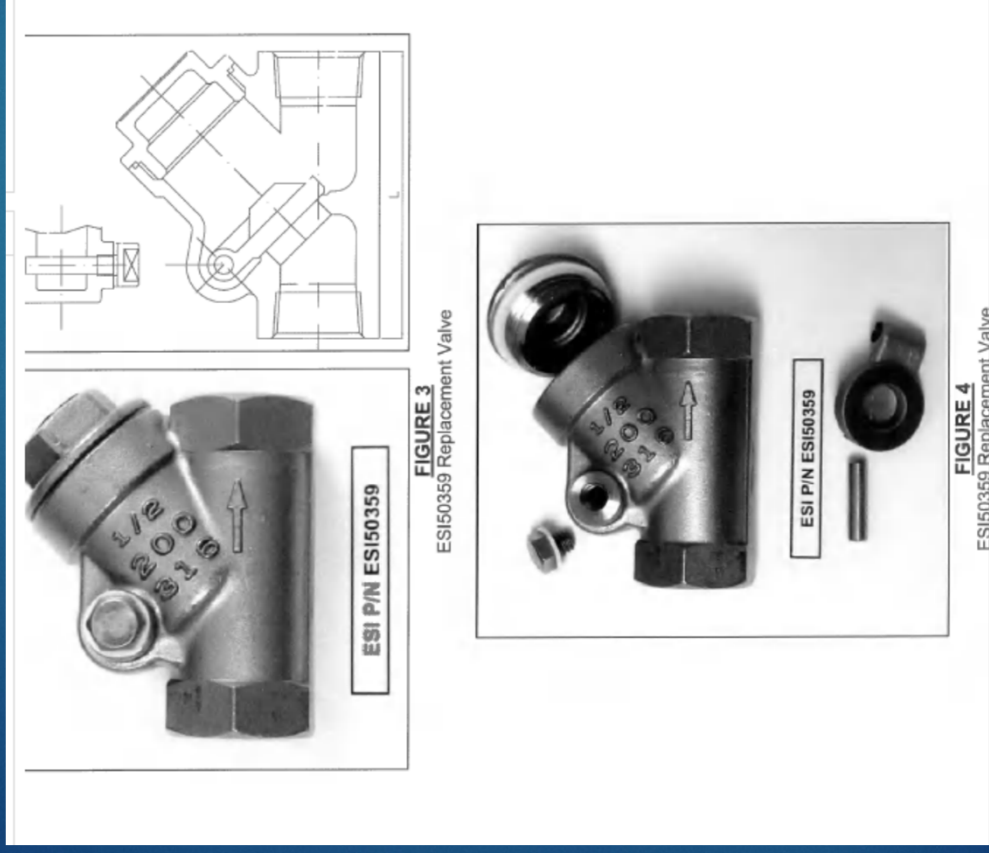
Communication from the Plant is Critical

Relationships with Customers
Owners Groups



Example: Swing Check Valve

- Hinge screw comes loose in service
- Plant System Engineer notifies ESI
- ESI confirms loose screws on valves in inventory
- ESI Engineering & Plant System Engineer discuss solutions and Reportability
- ESI issues Part 21 Notification





Example: Voltage Regulator System

- Plant Engineering notifies ESI of a hotspot detected at an electrical connection
- Damage has occurred to the Glastic Insulating Material





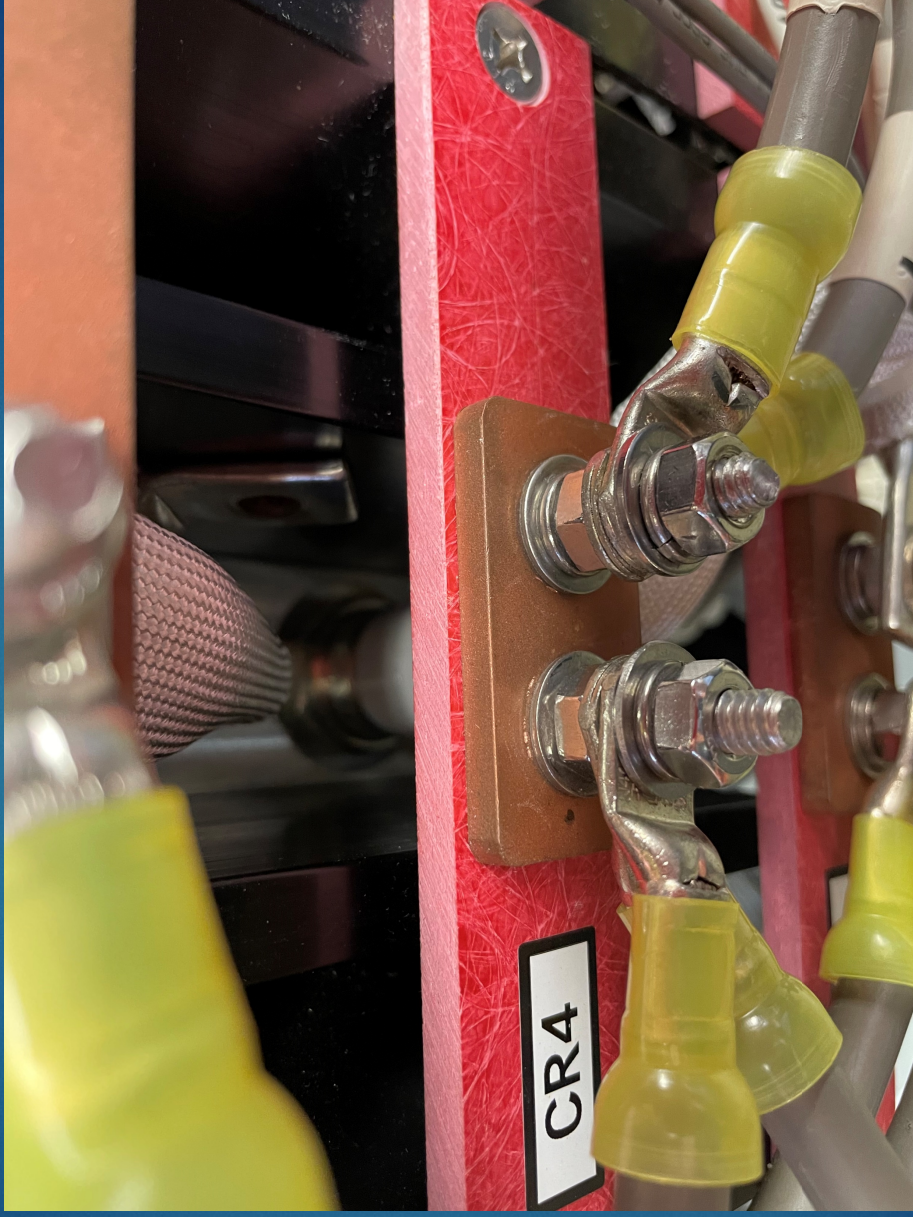
Example: Voltage Regulator System (cont)

- Multiple Telephone Conferences & Emails
- Investigation and Information Provided by Plant





Example: Voltage Regulator System (cont)





Example: Voltage Regulator System (cont)





- ▶ ESI has issued 138 Part 21 Notifications since approximately 1980.
- ▶ Communication with customers helps facilitate proper evaluation and reporting
- ▶ NEI 14-09A, Section 8.2
 - ▶ “If the purchasers or affected licensees discover a deviation or failure to comply of a basic component that has been delivered for use from a supplier, the purchasers or affected licensees are encouraged to notify the supplier of the discovery of the deviation or failure to comply. Notification to the supplier in writing is preferred. The notification to the supplier would allow them to perform an assessment to determine if the supplier delivered basic components with the same deviation to other customers. The supplier is also encouraged to assist the purchasers or affected licensees in their evaluation of the identified deviation or failure to comply.”