From:	Richard Knott
То:	Hoc, HOO X
Cc:	Daniel Dale; Joe Garguilo; Jim Hootman; Ross Lorberbaum; Douglas VanTassell
Subject:	[External_Sender] RE: Final Update Retracting Interim Report Regarding a Potential Defect with Schneider Electric Medium Voltage VR Type Circuit Breaker Part Number V5D4133Y000
Date:	Saturday, July 27, 2024 8:36:14 AM
Attachments:	Interim Report P21-04152024-INT Final update NRC.pdf

Good Morning,

Please see Paragon's final update retracting the need for reporting this issue per 10CFR Part 21. This issue has been attributed to maintenance performance and is not considered a defect in design or manufacturing.

I confirm that no proprietary, legally privileged, and/or confidential information is included in the attached notification.

Please contact me if you have any questions or concerns. Please acknowledge receipt via reply to this email.

Best Regards, Richard Knott

Richard Knott Vice President, Quality Assurance

(518)450-9706 (C) | <u>www.ParagonES.com</u>



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From: Richard Knott Sent: Saturday, June 29, 2024 10:36 AM

To: hoo.hoc@nrc.gov

Cc: Daniel Dale <ddale@paragones.com>; Joe Garguilo <JGarguilo@ParagonES.com>; Jim Hootman <JHootman@ParagonES.com>; Ross Lorberbaum <RLorberbaum@ParagonES.com>; Douglas VanTassell <DVanTassell@ParagonES.com>

Subject: RE: Update to Interim Report Regarding a Potential Defect with Schneider Electric Medium Voltage VR Type Circuit Breaker Part Number V5D4133Y000

Good Morning,

Please see attached updated Interim Report provided per 10CFR Part 21 section 21.21(a)(2). This is the third update to this Interim Report. Paragon continues to work closely with the OEM to complete the evaluation. To date the OEM has not been able to recreate the issue reported and

Paragon needs additional time to confirm no defect exists.

I confirm that no proprietary, legally privileged, and/or confidential information is included in the attached notification.

Please contact me if you have any questions or concerns. Please acknowledge receipt via reply to this email.

Richard Knott

Vice President, Quality Assurance (518)450-9706 (C) | <u>www.ParagonES.com</u>



From: Richard Knott

Sent: Friday, May 31, 2024 2:34 PM

To: <u>hoo.hoc@nrc.gov</u>

Cc: Daniel Dale <<u>ddale@paragones.com</u>>; Joe Garguilo <<u>JGarguilo@ParagonES.com</u>>; Jim Hootman <<u>JHootman@ParagonES.com</u>>; Ross Lorberbaum <<u>RLorberbaum@ParagonES.com</u>>; Douglas VanTassell <<u>DVanTassell@ParagonES.com</u>>

Subject: RE: Update to Interim Report Regarding a Potential Defect with Schneider Electric Medium Voltage VR Type Circuit Breaker Part Number V5D4133Y000

Good Evening,

Please see attached updated Interim Report provided per 10CFR Part 21 section 21.21(a)(2). This is the second update to this Interim Report. The OEM (Schneider Electric) has not yet been able to identify the cause of the issue reported. Paragon continues to work closely with the OEM to complete the evaluation.

I confirm that no proprietary, legally privileged, and/or confidential information is included in the attached notification.

Please contact me if you have any questions or concerns.

Regards, Richard

Richard Knott Vice President, Quality Assurance (518)450-9706 (C) | <u>www.ParagonES.com</u>



From: Richard Knott Sent: Thursday, May 2, 2024 7:03 PM To: <u>hoo.hoc@nrc.gov</u>

Cc: Daniel Dale <<u>ddale@paragones.com</u>>; Joe Garguilo <<u>JGarguilo@ParagonES.com</u>>; Jim Hootman <<u>JHootman@ParagonES.com</u>>; Ross Lorberbaum <<u>RLorberbaum@ParagonES.com</u>>; Douglas VanTassell <<u>DVanTassell@ParagonES.com</u>>

Subject: Update to Interim Report Regarding a Potential Defect with Schneider Electric Medium Voltage VR Type Circuit Breaker Part Number V5D4133Y000

Good Evening,

Please see attached updated interim report provided per 10CFR Part 21 section 21.21(a)(2).

I confirm that no proprietary, legally privileged, and/or confidential information is included in the attached notification.

Please contact me if you have any questions or concerns.

Regards, Richard

Richard Knott Vice President, Quality Assurance (518)450-9706 (C) | www.ParagonES.com



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From: Richard Knott Sent: Tuesday, April 16, 2024 10:29 PM

To: <u>hoo.hoc@nrc.gov</u>

Cc: Daniel Dale <<u>ddale@paragones.com</u>>; Joe Garguilo <<u>JGarguilo@ParagonES.com</u>>; Jim Hootman <<u>JHootman@ParagonES.com</u>>; Ross Lorberbaum <<u>RLorberbaum@ParagonES.com</u>>

Subject: Interim Report Regarding a Potential Defect with Schneider Electric Medium Voltage VR Type Circuit Breaker Part Number V5D4133Y000

Good Evening,

Please see attached Interim Report provided per 10CFR Part 21 section 21.21(a)(2).

Please let me know if there are any questions regarding this submittal.

Best Regards, Richard

Richard Knott Vice President, Quality Assurance (518)450-9706 (C) | <u>www.ParagonES.com</u>

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7/27/2024

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

10CFR Part 21 Interim Notification: P21-04162024-INT Final Update

Subject: Retraction of Interim Report Regarding a Potential Defect with Schneider Electric Medium Voltage VR Type Circuit Breaker Part Number V5D4133Y000.

Pursuant to 10CFR 21.21 (a)(2), Paragon Energy Solutions, LLC is providing this final updated interim notification **retracting** the need for Part 21 reportability of a potential defect with the subject circuit breaker part number V5D4133Y000.

Potential Affected Plants:

Plant	Customer PO#	Line #	CatID/Item #	QTY
Duke-Oconee	156762	001	881325	8

Condition evaluated:

On February 15th, 2024, Paragon completed initial documentation of a potential defect with the subject circuit breaker in which Duke-Oconee had identified failure to close on demand or delayed operation to close with extended application of the remote closing signal. Since the primary safety function of the circuit breaker is to close and maintain continuity of power to downstream loads, failure to close could potentially contribute to a substantial safety hazard.

This is the first reported instance of this failure mode, and Paragon suspected the issue to be related to aging of the circuit breaker's lubrication. Paragon performed investigative testing. During this process, the operating mechanism of the circuit breaker was cleaned and relubricated. Upon completion of re-lubrication, the circuit breaker was tested to verify proper operation. The circuit breaker operated per design upon completion of these activities. Paragon then incorporated a 2-week rest period (no breaker cycling). During the first close operation after the rest period, it was observed the circuit breaker again was exhibiting a delayed closure.

Paragon has been working closely with OEM (Schneider Electric) to conduct the failure analysis. After extensive inspection and testing by Schneider Electric, the condition has not been able to be recreated following cleaning and relubrication activities, nor has any non-conformances with breaker parts and materials been identified that would cause delayed closing of the breaker mechanism. Paragon has reviewed the final OEM analysis report and concludes the issue exhibited with this breaker is related to lubrication maintenance and not the result of any defect in design or manufacturing. Paragon will be updating instruction manuals associated with this breaker element for all clients recommending more frequent cleaning, relubricating and cycling frequencies.

Based on the evaluation conducted, Paragon has concluded the deviation discussed above is not reportable per 10CFR Part 21.

Paragon Energy Solutions 7410 Pebble Drive • Fort Worth, Texas • 76118 817-284-0077 • Fax 817-590-0484 Paragon recommends Licensees with the breaker types listed above monitor for failure to close on demand or delayed closure after application of the closure demand signal. If the plant experiences similar issues, please contact Paragon for maintenance guidance until the revised instruction manual is issued.

Any questions or concerns may be directed to the contact information below.

Regards,

Richard Knott Vice President Quality Assurance Paragon Energy Solutions 817-284-0077 rknott@paragones.com