



November 2, 2005

NRC's Document Control Desk
U.S. Nuclear regulatory Commission
Washington, DC 20555-001

Subject: Nuclear Industry Advisory

PRIME Measurement Products, formerly Barton Instrument Systems & ITT Barton, is a supplier of basic components to the commercial nuclear power industry. This letter transmits a notification of concern that is being mailed to all the facilities that have potentially nonconforming transmitters as listed in the attachment. A copy the notification made to our customers is being provided for you information and action as deemed applicable.

PRIME has identified that some Model 763, 763A and 764 transmitters were manufactured using Zener diodes that were not compliant with the design specifications. While the purchasing specifications called for JANTX components, commercial variations of the required parts were used to manufacture some transmitters.

The attached notification identifies the specifics of our concerns and recommends factory rework of all problem transmitters. Recent thermal and radiation testing on commercial Zener diodes show that these parts perform within acceptable limits considering the margin available in the original qualification thereby supporting continued operation of currently installed transmitters until suitable replacements can be obtained.

Questions regarding this issue should be addressed to Mark Larson, Nuclear & Government Product Engineering Manager, at (626) 961-2547, extension 228.

Sincerely,

A handwritten signature in black ink, appearing to read "Bradley W. Spahr".

Bradley W. Spahr
President and CEO

Attachment: 6 pages

IE19

November 2, 2005

{ADDRESS}

Subject: Nuclear Industry Advisory

PRIME Measurement Products, formerly Barton Instrument Systems & ITT Barton, is a supplier of basic components to the commercial nuclear power industry. The specific components being reported are Model 763 & Model 763A Gage Pressure Transmitters and Model 764 Differential Pressure Transmitters.

PRIME has identified that some Model 763, 763A and 764 transmitters were manufactured using Zener diodes that were not compliant with the design specifications. While the purchasing specifications called for JANTX components, commercial variations of the required parts were used to manufacture some transmitters.

The attached advisory identifies a condition that might be reportable under 10CFR21 depending on the specific application and the procedures in effect at each facility using the instruments manufactured by PRIME. We are notifying you of this situation to allow a determination of the safety significance to be made. PRIME Measurement Products apologizes for any inconvenience this situation causes. A copy of this notification will be made available to the Nuclear Regulatory Commission.

The attached notification identifies the specifics of our concerns and recommends factory rework of all problem transmitters. Recent thermal and radiation testing on commercial Zener diodes show that these parts perform within acceptable limits considering the margin available in the original qualification thereby supporting continued operation of currently installed transmitters until suitable replacements can be obtained.

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Sincerely,

Bradley W. Spahr
President and CEO

Attachment: 5 pages

PRIME Measurement Products, LLC

NUCLEAR INDUSTRY ADVISORY

November 2, 2005

Barton Model 763, Model 763A and Model 764 Zener Diodes

PRIME Measurement Products, formerly Barton Instrument Systems & ITT Barton, is a supplier of basic components to the commercial nuclear power industry. The specific components being reported are Barton Model 763 & 763A Gage Pressure Transmitters and Barton Model 764 Differential Pressure Transmitters. PRIME sells these transmitters as fully functional LOCA qualified devices.

PRIME has identified that some Model 763, 763A and 764 transmitters were manufactured using a commercial variation of a Zener diode that should have been a JANTX device. This situation occurred as a result of a purchasing problem and was not discovered during receipt inspection / part dedication process.

PRIME has identified that the first commercial Zener diodes of concern arrived into our stock system on February 10, 2004. No transmitters with the commercial Zener diodes have been shipped from the factory since September 19, 2005. All Models 763, 763A and 764 transmitters shipped between these dates need to be considered a potential problem. The 76 specific transmitters of concern are identified in the attached listing.

There were still 69 JANTX Zener diodes in stock at the time the commercial diodes were added to stock. Therefore, some of the transmitters of concern identified in this notification may not have the commercial Zener diodes installed. Each transmitter has two Zener diodes so it is very likely that at least 34 of the reported 76 transmitters are not actually problems. In addition, there is a possibility that some other circuit boards with JANTX Zener diodes had already been assembled but not tested prior to the time the commercial Zener diodes went to stock. This situation would further reduce the population of transmitters with commercial Zener diodes.

The JANTX Zener diodes are different in appearance with respect to the commercial variations. Some JANTX Zener diodes used in the recent past have bodies that are solid orange or light blue in color or clear glass. The commercial Zener Diodes that have been used have a body that is clear glass. The attached photo compares the larger commercial Zener diode (0.095" diameter X 0.275" long) with the smaller JANTX Zener diode (0.072" diameter X .155" long) that has a glass body. The existence of the commercial Zener diode can be verified by visual inspection. Remove the transmitter electronics cover and visually observe the Zener diodes at locations CR2 and CR3 as shown on the attached drawing of the circuit board.

All Zener diodes have passed factory performance testing at 340°F (the maximum sustained PWR LOCA temperature) prior to transmitter shipment. Therefore there is a high degree of confidence that the transmitters shipped with commercial Zener diodes will perform at the accident temperatures as intended.

The original Barton qualifications for the transmitters allowed a 200 Mrad radiation induced shift of $\pm 10\%$ while the actual radiation induced shift experienced did not exceed 2.2%. Radiation testing at 200 Mrads total equivalent gamma exposures performed on the commercial Zener diodes demonstrates that they will contribute only an additional 0.34% in transmitter radiation induced accuracy degradation. Furthermore, the radiation testing performed on the commercial Zener diodes demonstrates that the thermal performance of these parts is not degraded by the radiation exposure maintaining the validity of the transmitter factory temperature compensation process.

PRIME believes that transmitters with commercial Zener diodes that are currently installed in a plant can be relied upon to continue to operate and perform their safety-related function in the event of an accident. This belief is based on the facts that the commercial Zener diodes installed in any transmitter

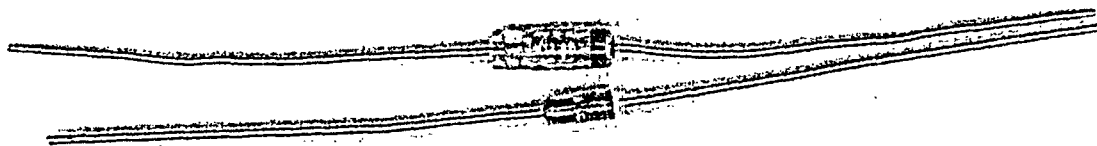
have been shown to be functional at the accident maximum sustained temperature and because the radiation effects on commercial Zener diodes are known to be within the margin of the original Barton qualification.

Although the commercial Zener diodes perform within acceptable limits, they do not perform as well as the JANTX parts. Furthermore, while PRIME believes that our manufacturing processes screen parts for performance similar to the MIL SPEC applicable to the JANTX parts, we have not performed thermal aging and other tests to validate the qualified life of the commercial Zener diodes. PRIME is therefore offering to rebuild the transmitters containing the commercial Zener diodes, at no customer expense, using two new JANTX Zener diodes. It is recommended that all transmitters with commercial Zener diodes be returned to the factory for Zener diode replacement as soon as practicable. In this replacement, the transmitters will be recalibrated and temperature compensated to the original transmitter factory performance requirements and as tested nuclear qualified configuration.

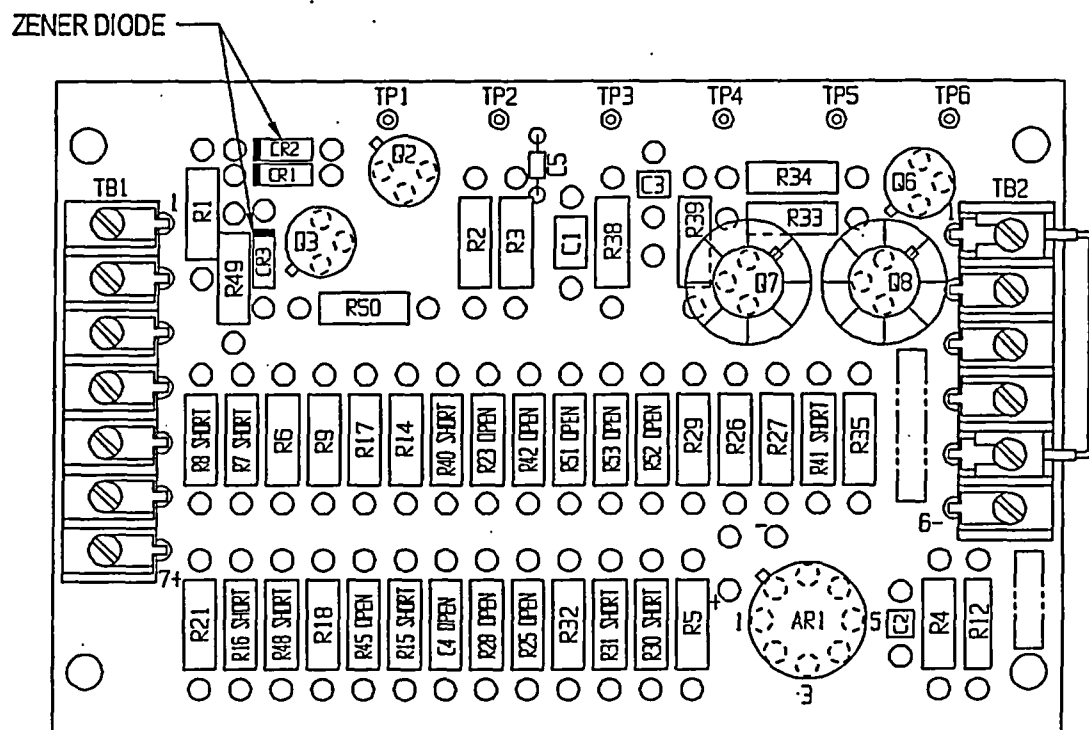
The Zener diodes are not field replaceable, as it is necessary to electronically reestablish the calibration zero which will likely necessitate replacement of a calibration resistor. This calibration resistor is located in a very temperature sensitive portion of the electronic circuit requiring thermal performance validation.

In the event a transmitter verified to contain commercial Zener diodes can not be returned to the factory for repair because it is contaminated or can not be removed from service because of plant operability concerns please contact the factory for replacement scheduling. PRIME recognizes that these situations may represent a significant concern with regard to continued power generation for your customers and will give the repair and replacement activities associated with this issue the highest manufacturing priority. It is estimated that a diode replacement repair activity can be completed in about two weeks while manufacturing of a new transmitter can take upwards of three months depending on the range, configuration and amount of transmitters that need to be manufactured or repaired at the time.

Questions regarding this issue should be addressed to Mark Larson, Nuclear & Government Product Engineering Manager, at (626) 961-2547, extension 228. To schedule transmitter repairs and replacements please contact Mabel Loo, Contracts Administration Manager, at (626) 937-0335.



Larger Commercial Zener Diode & Smaller Similar Glass Body JANTX Zener Diode



Model 763, 763A and 764 Circuit Board Drawing Showing Zener Diode Locations

Customer	Model	S/N	Customer PO	Prime Order
Alabama Power (Farley)	764	5564	QP040574	28894
Barton, United Kingdom (British Energy)	763	2471	ZP00647	28788
	763	2472	ZP00647	28788
	763	2473	ZP00647	28788
	763	2474	ZP00647	28788
	763	2475	ZP00647	28788
	764	4298	29678	25595
British Energy	764	5604	SZB-40148872	32159
NAVICP	764	5547	N00104-04-C7028	28181
	764	5548	N00104-04-C7028	28181
	764	5582	N00104-04-PBQ88	29857
	764	5583	N00104-04-PBQ88	29857
	764	5584	N00104-04-PBQ88	29857
	764	5585	N00104-04-PBQ88	29857
	764	5599	N00104-04-C7028	28181
Entergy (Waterford 3)	763A	418	10045946	25832
First Energy (Beaver Valley)	763A	424	45139403	30414
Fluid Controls (TPC)	764	5555	T41061PR	27891
	764	5556	T41061PR	27891
	764	5557	T41061PR	27891
	764	5558	T41061PR	27891
	764	5562	T41061PR	27891
	764	5563	T41061PR	27891
KHNP	764	5606	K040374471	30921
	764	5607	K040374471	30921
SGT Ltd. (Callaway)	764	5564	9221-3881	29475
	764	5565	9221-3881	29475
	764	5566	9221-3881	29475
	764	5567	9221-3881	29475
	764	5568	9221-3881	29475
	764	5569	9221-3881	29475
	764	5570	9221-3881	29475
	764	5571	9221-3881	29475
	764	5572	9221-3881	29475
	764	5573	9221-3881	29475
	764	5574	9221-3881	29475
	764	5575	9221-3881	29475
	764	5576	9221-3881	29475
	764	5577	9221-3881	29475
	764	5578	9221-3881	29475
	764	5579	9221-3881	29475
	764	5580	9221-3881	29475
	764	5581	9221-3881	29475
	764	5600	34430-1005-PO	30985
	764	5601	34430-1005-PO	30985
	764	5602	34430-1005-PO	30985
	764	5603	34430-1005-PO	30985

Customer	Model	S/N	Customer PO	Prime Order
Union Electric (Callway)	764	5608	198001 SR	31597
	764	5609	198001 SR	31597
	764	5610	198001 SR	31597
	764	5611	198001 SR	31597
	764	5612	198001 SR	31597
	764	5613	198001 SR	31597
Electrobras Termonuclear S.A.	764	5586	4500060123	30915
Westinghouse	764	5587	4500148633	30125
	764	5588	4500148633	30125
	764	5589	4500149482	30308
	764	5590	4500149482	30308
	764	5591	4500149482	30308
	764	5592	4500149482	30308
	764	5593	4500149482	30308
	764	5594	4500149482	30308
	764	5595	4500149482	30308
	764	5596	4500149482	30308
	764	5597	4500149482	30308
	764	5598	4500149482	30308
	764	5605	4500154485	31037
	763A	419	4500117146	24997
	763A	420	4500117146	24997
	763A	421	4500117146	24997
	763A	422	4500117146	24997
	763A	423	4500145093	29541
	763A	425	4500117165	25035
	763A	426	4500117165	25035
	763A	427	4500117165	25035
	763A	428	4500117165	25035