



NLI-QA-3565

DATE: 1/13/2017

TO: United States Nuclear Regulatory Commission

ATTN: Document Control Desk, Washington, DC 20555-0001

Reference: Docket Number 99901471
NRC Inspection Report No: 99901471/2016-201

Subject: Reply to a Notice of Violation dated December 14, 2016
Reply to a Notice of Nonconformance Dated December 14, 2016

To Whom It May Concern,

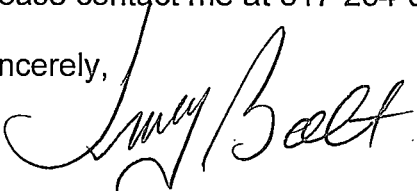
This letter is in response to the referenced NRC inspection report, dated December 14, 2016. The report pertains to an inspection that was performed by the NRC from September 19 through 22, 2016, at the Fort Worth facility of AZZ | Nuclear Logistics (NLI).

The report identified one (1) Notice of Violation and four (4) Notices of Nonconformance. Each of these is addressed in individual supplements to this letter.

NLI is committed to addressing the issues that have been identified in the NRC inspection report and improving our program. We appreciate the thoroughness and professionalism displayed by the NRC inspection team during their visit to our facility.

Please contact me at 817-284-0077 if you have any questions.

Sincerely,


Tracy Bolt
Director of Quality Assurance
AZZ|NLI

IED9
NRD

cc: United States Regulatory Commission, Chief, Quality Assurance Vendor Inspection Branch-1,
Division of Construction Inspection and Operational Programs, Office of New Reactors

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Supplement 1 - Reply to a Notice of Violation

AZZ Nuclear Logistics Inc. (NLI) Docket No.:99901471
Fort Worth, TX

Based on the results of a U.S. Nuclear Regulatory Commission (NRC) inspection conducted at the AZZ Nuclear | NLI (AZZ | NLI) facility in Ft. Worth, TX, from September 19, 2016, to September 22, 2016, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

Title 10 of the *Code of Federal Regulations* (10 CFR) Part 21, Reporting of Defects and Noncompliance, Paragraph 21.21(c)(1), states, in part, that, "A dedicating entity is responsible for identifying and evaluating deviations and reporting defects and failures to comply associated with substantial safety hazards for dedicated items."

Contrary to the above, as of September 22, 2016, AZZ | NLI failed to adequately evaluate deviations associated with a substantial safety hazard for a dedicated item. Specifically, AZZ | NLI failed to adequately evaluate spurious tripping of Masterpact circuit breakers supplied to Public Service Enterprise Group (PSEG) - Hope Creek, as required by 10 CFR 21.21(c)(1). AZZ | NLI's evaluation for this issue inadequately concluded that this issue was not reportable based upon the assumption that the only safety function of these breakers was to open and that spurious tripping would not affect the safety function of these breakers.

This issue has been identified as Violation 99901471/2016-201-01.

NLI Response:

(1) The reason for the violation:

NLI agrees that the safety function of the breaker was incorrectly stated in the original Nonconformance report that was completed in 2015. That conclusion was based on communications between NLI and the (then) responsible plant personnel regarding the event and the application of these breakers. Updated information by the plant has confirmed that for the specific application in question: *The Class 1E Safety related Masterpacts are required to trip in accordance with design AND provide power to their intended load. Class 1E Safety related loads have specific requirements to energize and/or remain energized (i.e. fans), so Masterpacts would be required to close and remain closed to provide power to the load.*

In regard to evaluating deviations associated with substantial safety hazards per 10CFR 21.21(c)(1); the stated deviation was evaluated by both NLI and the manufacturer of the equipment. It was determined at that time through extensive testing by both NLI and the manufacturer working closely with plant personnel, that a defect does not exist within the equipment and that the nuisance trips are being caused by a condition in the plant. However, based on the rules per 10CFR part 21.21 (b) *If the deviation or failure to comply is discovered by a supplier of basic components, or services associated with basic components, and the supplier determines that it does not have the capability to perform the evaluation to determine if a defect exists, then the supplier must inform the purchasers*

or affected licensees within five working days of this determination so that the purchasers or affected licensees may evaluate the deviation or failure to comply, pursuant to § 21.21(a).

Although the plant was involved in the testing performed by NLI and the manufacturer, NLI failed to provide formal notification to the plant that NLI could not complete the determination.

(2) The corrective steps that have been taken and the results achieved:

NLI has entered this NOV into our corrective action program

In light of the information provided as a result of the NRC inspection, NLI has formally notified the plants that NLI does not have the capability to determine if the deviation that is being experienced is a condition that if left uncorrected could create a substantial safety hazard. In addition, NLI is generating a Technical Bulletin describing the condition and will be submitting to all clients with similar equipment installed. It will be each plant's responsibility to evaluate their systems to determine if the deviation exists. This specific deviation has not been reported to NLI by any client other than PSEG Hope Creek. It should be noted that if a spurious trip does occur, the breaker can be manually reset and re-closed.

(3) The corrective steps that will be taken:

Training will be administered to the engineering staff regarding the specific requirements of evaluating deviations and failures to comply and the reporting rules in accordance with the requirements of 10CFR part 21.

(4) The date when full compliance will be achieved:

2/28/2017

End of Supplement 1 - Reply to a Notice of Violation

Supplement 2 - Reply to a Notice of Nonconformance 99901471/2016-201-02

Criterion III, "Design Control," of Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, "Domestic Licensing of Production and Utilization Facilities," states, in part, that, "measures shall include provisions to assure that appropriate quality standards are specified and included in design documents and that deviations from such standards are controlled."

Procedure AZZ-QAP-03, "Design Control," Revision 2, Section 4.3.1.2, "Design and Production Tests," states, in part, that, "Design and production tests, where required, will be performed on assemblies that are designed, manufactured, and assembled by AZZ | NLI or by approved subcontractors. Testing will be performed in accordance with a Test Plan incorporating the client's requirements and/or applicable industry standards and the acceptance criteria will be specified."

Contrary to the above, as of September 22, 2016, AZZ | NLI failed to ensure that appropriate quality standards were specified and included in design documents. Specifically, AZZ | NLI failed to ensure that the requirements contained in a purchase order (PO) from Energy Northwest, associated with electromagnetic compatibility (EMC) testing of a safety-related power supply were properly incorporated into the design documents (the test plan). Consequently, AZZ | NLI performed the EMC testing to International Electrotechnical Commission (IEC) standard revisions that were not in accordance with the PO requirements. The standard revisions used for the testing were different than the referenced PO standards in parameters such as dB levels, test set up distances, equipment parameters, effective source impedances, insulation support, etc.

These issues have been identified as Nonconformance 99901471/2016-201-02.

NLI Response:

(1) The reason for the noncompliance

The engineer responsible for the report utilized the latest revision of the testing standards. The engineer believed the latest revision of EPRI TR-102323 was acceptable. Additionally, the engineer misunderstood that the RG 1.180 only endorsed the testing standards to a specific year.

(2) The corrective steps that have been taken and the results achieved;

NLI has entered this NON into our corrective action program.

Engineering created an internally published reference table that has the applicable EPRI TR-102323 and Reg. Guide 1.180 revisions with the associated test standard revisions (year) required to be used for compliance with the specific standard revision required for the project at hand.

The engineering department performed a reconciliation of the standard year used for testing vs. the standard year referenced in the required EPRI and Reg. Guide.

Engineering is in the process of reviewing the qualification plans on current open projects to ensure that the correct industry standard year editions per EPRI TR-102323 and/or Reg. Guide 1.180 and the client purchase order, are being utilized. This activity is scheduled to be completed by 1/31/2017.

Additionally, NLI engineering will examine a sampling of additional projects to ensure the correct year editions are utilized. If additional issues are identified, the examination will be expanded to a larger sample size of projects. This activity will be completed by 2/28/2017.

(3) The corrective steps that will be taken

The engineering group was counseled on the significance of this noncompliance to immediately recognize the limitations for implementation into test plans that are in the process of being developed.

Training was administered to the engineering department on the use of the reference table and the specific application of the testing standards.

(4) The date when full compliance will be achieved.

All required actions will be completed by 2/28/2017.

End of Supplement 2 - Reply to a Notice of Nonconformance 99901471/2016-201-02

Supplement 3 - Reply to a Notice of Nonconformance 99901471/2016-201-03

Criterion III, "Design Control," of Appendix B "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities," states, in part, that, "The design control measures shall provide for verifying the adequacy of the design, such as by the performance of design reviews, by the use of alternate or simplified calculational methods, or by the performance of a suitable testing program."

Contrary to the above, as of September 22, 2016, AZZ | NLI failed to take adequate actions to verify the adequacy of the design for Masterpact breakers supplied to Public Service Enterprise Group (PSEG), for use at the Hope Creek Nuclear Station, and that are used as motor starters with overcurrent trip devices that are powered from the load side of the breakers. Since the overcurrent trip devices for these breakers only receive power once the breakers are shut (upon starting of a motor), there is an undefined startup time before the breaker can accurately process load current data. When used as a motor starter, this startup time could potentially cause erroneous data to be acquired or make them more susceptible to noise interference. AZZ | NLI had not verified the adequacy of this aspect of the design as part of their design verification or commercial grade dedication processes.

This issue is identified as Nonconformance 99901471/2016-201-03.

NLI Response:

(1) The reason for the noncompliance or, if contested, the basis for disputing the noncompliance

NLI disagrees with the issue being identified as noncompliance. The design of the Masterpact circuit breaker was verified extensively by review, qualification testing and dedication testing activities in addition to review of operating history. Although this unexplained phenomenon has occurred at the PSEG facility, the technical evaluations and dedication activities performed were adequate to ensure with *reasonable assurance* that the breaker would perform the intended safety function in the design application. The application of closing the breaker to start a fan motor was not considered a credible failure mode when the technical evaluation was performed. During the original dedication and qualification of the equipment, the trip unit was evaluated and verified to ensure that it would perform its intended safety function. During the technical evaluation, critical characteristics are identified based on the safety function. Per the NRC endorsed EPRI guidance; *The primary purpose of identifying critical characteristics during commercial-grade dedication is to identify those characteristics necessary to provide reasonable assurance that the item being dedicated is capable of performing its intended safety function(s).* The reliability of the breakers in the commercial and nuclear industry support the position by NLI that the events experienced at the PSEG facility are unique to the application and use at the plant. NLI has supplied more than 1000 Masterpact breakers to the nuclear industry at various plants around the world. Of the entire population of Masterpact breakers, 27 safety related breakers are being utilized as fan motor starters at PSEG Hope Creek. This nuisance trip condition has only presented itself in eight (8) specific safety related locations in applications at Hope Creek. Since the NRC Event

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notification 42168 that was submitted in November 2005, there have been no other reports by any utility other than PSEG Hope Creek regarding the nuisance trip issue. The condition identified in NRC Event Number 42168 was able to be isolated, repeated and corrected by NLI and the OEM.

The specific action of closing the breaker to start a fan motor was not considered a credible failure mode. It has been demonstrated by both NLI and the OEM through extensive specific motor start testing, that if this test would have been performed during the dedication activity, the issue still would not have been identified. NLI has performed testing by closing the breaker to start a fan motor more than 320 times while performing the EMC testing. This testing was performed using the same breaker that experienced the nuisance trip at Hope Creek, to attempt to replicate the identified issue. To date, neither NLI nor the OEM have been successful in repeating the events at PSEG Hope Creek. This condition is not a credible failure mode that can be repeated outside the installed application. Hope Creek has confirmed that in the specific safety related application, there have been only 17 trips over the last 10 years. There have been approximately 21300 breaker closings which is an average of 178 starts per month for the sixteen (16) specific breaker locations. The probability of a single nuisance trip is 0.079% (1 in 1268 fan motor starts). This is a 99.92% reliability that the breaker will close without a nuisance trip.

Note: In all cases the breakers are able to be manually reset and re-closed.

(2) The corrective steps that have been taken and the results achieved;

NLI has entered this NON into our corrective action program for formal documentation of the issue.

Due to the complexity of this specific issue and no viable test method and criteria, no specific actions have been performed or are required due to this Notice of Noncompliance. NLI, the OEM and Hope Creek continue to investigate the cause of the nuisance trip at their facility. Although in this application there is a low probability of a nuisance trip, the reliability of the breaker is 99.92% that the breakers will not have a nuisance trip. The specific cause of the nuisance trip has yet to be identified.

Note: If the breaker does trip, it can be reset and re-closed.

(3) The corrective steps that will be taken; and

None are required at this time.

(4) The date when full compliance will be achieved.

Not applicable

End of Supplement 3 - Reply to a Notice of Nonconformance 99901471/2016-201-03

Supplement 4 - Reply to a Notice of Nonconformance 99901471/2016-201-04

Criterion III, "Design Control," of Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities," states in part that, "Measures shall also be established for the selection and review for suitability of application of materials, parts, equipment, and processes that are essential to the safety-related functions for the structures, systems and components."

Contrary to the above, as of September 22, 2016, AZZ | NLI failed to ensure the suitability of equipment that is essential to the safety-related functions for certain components supplied to the nuclear industry on two occasions. First, AZZ | NLI failed to verify the critical characteristic of total harmonic distortion and power quality on the output of a repaired Exeltec inverter supplied to Entergy under PO 10454062. In the second instance, AZZ | NLI failed to identify and verify the critical characteristic of current interrupting rating for Masterpact circuit breakers supplied to Tennessee Valley Authority under PO 758798.

This issue is identified as Nonconformance 99901471/2016-201-04.

NLI Response:

(1) The reason for the noncompliance, or, if contested, the basis for disputing the noncompliance or severity level;

- A. The inverter was returned to NLI from the client to have refurbishment activities performed on the unit. This unit had been previously dedicated by NLI using the dedication plan that had been approved by the client for the application. The dedication plan was revised to include a reference to the generic technical evaluation for inverters. There was no reference or explanation made on the dedication plan as to why the harmonic distortion was not required to be verified for the unit being tested following the required activities that were being performed on the unit. The unit was tested utilizing the critical characteristics that had been approved by the client.
- B. A review of NLI circuit breaker technical evaluations TE-E-2 and TE-E-6 has been performed for completeness. Additionally, UL489 and NRC bulletin 88-10 have been reviewed to determine the applicability of circuit breaker interrupt rating as a critical characteristic. The breaker interrupt rating is not considered a critical characteristic because there is no credible failure mechanism associated with this design characteristic.

A root cause evaluation is not required based on the following discussion.

NLI utilizes industry documents UL489, NRC bulletin 88-10, OEM documentation and EPRI 3002002982 as supporting basis, along with the NLI technical evaluation, for determination of the critical characteristics to be verified during dedication testing of circuit breakers.

The identification of critical characteristics involves four basic steps:

- 1) Identify credible failure modes and mechanisms that could prevent the item from performing its safety function.
- 2) Critical characteristics are identified that, when verified, support the item's safety function and precludes the potential failures identified.
- 3) The critical characteristics identified is reviewed to ensure they are adequate to provide reasonable assurance that the item being dedicated will be able to perform each intended safety function.
- 4) The critical characteristics selected are clearly documented in the technical evaluation along with the basis for their selection.

As an alternative to identification of critical characteristics based upon known safety functions and an FMEA, critical characteristics can be identified using the original design criteria if it is available. This may occur when:

- 1) The dedicating entity does not know the end-use applications for the item and cannot establish specific boundaries for the dedication.
- 2) The dedicating entity has access to the original design information.

Generally, NLI does not have access to the original design information for circuit breakers. Therefore, a technical evaluation was performed for the circuit breakers to establish the critical characteristics necessary to preclude failure of the item to perform its safety function. The established critical characteristics are included in the dedication test plan used to dedicate the circuit breakers.

Per guidance from EPRI, design characteristics that are necessary to preclude failure of the item are identified by taking various types of information into account such as:

- a) Original design basis information.
- b) Known or bounded end uses.
- c) Known or bounded safety functions.
- d) Credible failure mechanisms and modes (i.e., results of an FMEA).
- e) Review of available technical data provided by the supplier including supplier information letters.
- f) Review of operating experience.
- g) Service conditions (i.e., seismic, environmental).

There are two (2) basic methods that can be used to identify design characteristics necessary to preclude failure.

- a) The method upon which dedication methodology was originally based considers end-use applications, safety functions, and evaluations such as failure modes and effects analysis to identify design characteristics in the absence of original design information.
- b) When original design information is available in sufficient detail to identify critical characteristics it may be used.

The extent to which each method is used in an evaluation is dependent upon the dedicating entity's access to original design documentation and knowledge of end-use(s) and safety function(s).

Based on the above, all design characteristics are not considered critical characteristics and do not require verification. Some examples of design characteristics which may or may not be considered critical include interrupt rating, mechanical endurance, electrical endurance, current rating, tripping characteristics (both instantaneous and thermal) and insulation resistance. It is important to note that direction provided in EPRI 3002002982, that not all design characteristics need to be considered critical characteristics. However, the critical characteristics selected must provide reasonable assurance that the item being dedicated is capable of performing its intended safety-related functions and characteristics identified as critical characteristics must be verified. The critical characteristics of an item should include physical, performance and dependability characteristics as appropriate.

The technical evaluation should clearly document critical characteristics and their basis for selection and provide sufficient detail to clearly identify the relationship between the critical characteristics and the associated safety function(s). Documentation should be thorough and clear enough to enable a reviewer to come to the same conclusion reached by the preparer during the evaluation.

Based on review of UL 489, "*Standard for Molded Case Circuit Breakers, Molded-Case Switches, and Circuit Breakers Enclosures*," the following tests are performed by the OEM on the circuit breaker: calibration tests (200%, 135%, 100%), temperature, interrupt test, insulation resistance, overload trip test, hold-in, mechanical tests, barrier and liner test, conformal coating and power level determination test. While UL489 guidelines stipulate that the OEM perform the listed tests to obtain UL489 certification, NLI uses this information in development of the circuit breaker technical evaluation to determine the set of critical characteristics to be verified.

Additionally, review of NRC 88-10, "*Nonconforming Molded Case Circuit Breakers*," the following tests recommended by the NRC are performed during dedication by NLI: Mechanical operation, individual pole resistance or millivolt drop test, rated hold-in, overload trip (600%), instantaneous trip, short-time trip, time delay trip (300%) and dielectric tests. Per the NRC bulletin, the dedication process should build from the commercial grade quality, include a proper evaluation of seismic and environmental qualification, confirm critical parameters, and include testing as appropriate. Also, the NRC bulletin states that breakers purchased from OEM circuit breaker manufacturers or that can be traced to the OEM are of lesser concern because the circuit breakers are manufactured under controlled conditions to conform to a proven design. All breakers purchased and dedicated by NLI are traceable to the OEM. If the traceability cannot be established then the breaker is not supplied by NLI for use in safety-related applications. Finally, from NRC 88-10, the NRC considers the tests listed in the bulletin to provide a reasonable assurance of performance characteristics and characteristics most important to ensuring reactor safety.

Based on the above, the NLI technical evaluations covering circuit breakers identify the critical characteristics to be verified, based partly on requirements contained in UL489 and guidance of NRC 88-10. The NLI commercial grade dedication plans identify the critical characteristics, which are verified during the dedication process. Additional design

characteristics not listed in UL489 or NRC 88-10 may be included in the NLI technical evaluations. When these additional design characteristics are deemed relevant by NLI, they are verified during the dedication process. The set of critical characteristics selected provides reasonable assurance that the breaker design is adequate and meets the entirety of design characteristics. Therefore, not all design attributes (e.g., interrupt rating, mechanical endurance, electrical endurance) need to be verified. The tested and verified characteristics along with the published OEM design documentation provide the reasonable assurance that the circuit breaker will perform its intended safety function.

NLI's position is that interrupt rating is not considered a critical characteristic, therefore there are no actions required to prevent recurrence.

(2) The corrective steps that have been taken and the results achieved;

NLI has entered the notice of noncompliance into our corrective action program to formally document the responses.

(3) The corrective steps that will be taken; and

A. Training has been administered to the engineering staff in regards to ensuring the dedication plan clearly identifies when a critical characteristic that is identified in a generic technical evaluation is not required for the specific application the item is being dedicated for or when the client states that a critical characteristic that has been identified by NLI is not applicable for their application and is not required.

B. None are required

(4) The date when full compliance will be achieved.

All required actions have been completed.

End of Supplement 4 - Reply to a Notice of Nonconformance 99901471/2016-201-04

Supplement 5 - Reply to a Notice of Nonconformance 99901471/2016-201-05

Criterion XVI, "Corrective Action," of Appendix B "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities," states, in part, that, "Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformance's are promptly identified and corrected."

Procedure NLI-QUAL-06, "Nonconformance Reporting, Corrective, and Preventative Action," Revision 19, dated November 3, 2011, Section 2.2 states, "Activities which are considered nonconformance's and may require corrective action(s) to prevent reoccurrence include but are not limited to the following: (a.) Items or services identified by the client or other organizations and suspected of not conforming to safety-related purchase order requirements and (b.) Initiation of 10 CFR Part 21 activities.

Contrary to the above, as of September 22, 2016, AZZ | NLI failed to assure that a condition adverse to quality, associated with Masterpact circuit breakers supplied by AZZ | NLI to multiple facilities, was promptly identified and corrected. Specifically, AZZ | NLI failed to ensure that a condition associated with the binding of the Masterpact circuit breakers was promptly corrected and that their customers were sufficiently notified regarding the full scope of the issue. NLI's initial corrective actions were limited to breakers that receive a "standing close signal" even though other conditions could also result in binding of the breakers, including:

- The breaker receiving a command to open electrically before or at the same time the close command is initiated.
- A remote closing action by a control room operator that may hold the close signal for a duration longer than 200 milliseconds which would extend into the charging cycle.
- A logic scheme that would have a component controlling the close circuit that would apply the voltage to the close coil for a duration longer than 200 milliseconds, which would extend into the charging cycle.

This issue is identified as Nonconformance 99901471/2016-201-05.

NLI Response:

(1) The reason for the noncompliance, or, if contested, the basis for disputing the noncompliance or severity level;

To clarify the statements made above; the "binding of the breaker" is referring to the internal close/trip mechanism that when the close signal is maintained for greater than 200 milli-seconds has the potential to bind preventing the breaker from being ready to close on the next valid close command. A complete description of the issue is contained within Technical Bulletin TB-12-007, Rev. 3 and is not repeated in this response.

The specific issue was addressed with the affected clients. The issue was identified and evaluated with the information that was available at the time. As new information and new questions arose, NLI performed additional evaluations and testing to better identify the issue. Although the information was revised to provide clarification, the intent of the condition did not change. The bulleted statements above are additional clarifications of what can be classified a "standing close" signal. The data and information provided in the previous versions of the technical bulletins and 10CFR part 21 notifications were intended to be understood by the responsible personnel who would be working with this type of equipment. If there were clarifications that were needed by the reader, NLI was able to provide the necessary support for clarification. As a result of the NRC inspection and the questions asked regarding the submitted documentation, NLI revised the 10CFR part 21 notification and the Technical Bulletin then reissued the documents to the NRC and the industry in September 2016.

It is to be noted that although the breaker, in certain scenarios has the potential to exhibit the condition that could possibly prevent the breaker being ready to electrically close on demand, the breaker can be manually reset and closed.

(2) The corrective steps that have been taken and the results achieved;

No additional actions are required.

(3) The corrective steps that will be taken; and

No additional actions are required.

(4) The date when full compliance will be achieved.

All required actions have been completed.

End of Supplement 5 - Reply to a Notice of Nonconformance 99901471/2016-201-05

REPLY TO NOTICE OF VIOLATION

REPLY TO NOTICE OF NONCONFORMANCE

AZZ Nuclear Logistics Inc. (NLI) Docket No.:99901471
Fort Worth, TX

ATTN: DOCUMENT CONTROL DESK

Copy to the Chief, Quality Assurance Vendor Inspection Branch-1, Division of Construction
Inspection and Operational Programs, Office of New Reactors