

Fax Cover Sheet

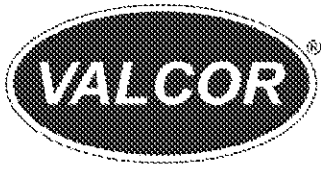
To:	3018165151	From:	Valcor
Pages:	3	Date:	Wed Aug 27 3:08:02 PM EDT 2025
Re:	Interim Part 21 Notification		

Comments:

Regards,
Michael Swirad
Vice President, Quality
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email: mikeswirad@valcor.com<mailto:mikeswirad@valcor.com>

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Valcor Engineering Corporation
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Springfield, NJ 07081
Tel: (973) 467-8400

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

August 26, 2025

SUBJECT: Interim 10 CFR Part 21 Report Regarding Columbia Generating Station (CGS) – Part 21 Notification EN 57785

This letter is submitted as an interim report in accordance with 10 CFR 21.21(a)(2) regarding a potential defect in Valcor solenoid valves, as described in the Part 21 notification submitted by Columbia Generating Station (Event Notification EN 57785).

Description of the Deviation:

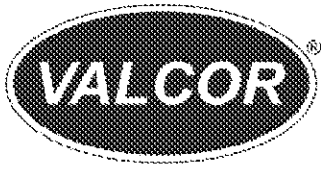
Valcor Engineering Corporation acknowledges receipt of CGS's Part 21 notification regarding the substitution of EM163-80 EPDM O-ring material in place of the now-obsolete E0515-80 material used in V70900-45 solenoid valves.

This material substitution was justified through Delta Qualification Report QRSKC26022-1, which supported the use of EM163-80 under the original qualification parameters. The report, and associated certification, was provided to CGS at their request.

To further support this material change, at CGS's request, Valcor commissioned an independent third-party evaluation, which concluded that EM163-80 is equivalent or superior to the original E0515-80 material, including thermogravimetric analysis in normally energized service. Based on this analysis, Valcor maintains that the material change does not constitute a defect as defined in 10 CFR Part 21.

CGS, however, concluded that the justification for the new material was inadequate and submitted a Part 21 report to the NRC based on their own internal and third-party review. As of the date of this report, Valcor has not received a copy of CGS's third-party evaluation, which they cite as the basis for their concern. We have formally requested this documentation to fully understand CGS's technical position and to complete our own evaluation.

At this time, based on currently available information, Valcor has not reached the same conclusion as CGS's defect characterization, and we consider the existing data and Valcor third-party analysis sufficient to demonstrate material equivalence. However, we are continuing our evaluation pending receipt of CGS third-party analysis.



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Evaluation Completion Date:

A final technical evaluation cannot be completed at this time due to the lack of supporting documentation from CGS, including: Their independent third-party evaluation report and relevant test results or failure analyses.

Until this information is received and adequately reviewed, we cannot determine whether the condition represents a deviation or defect as defined in 10 CFR Part 21. We are requesting an extension for our evaluation, for at least 60 days upon receipt of the requested information. If a defect is confirmed, Valcor will submit a final report to the NRC in accordance with 10 CFR 21.21(d)(4).

Please contact me via email if any additional information is required.

Sincerely,

Signer ID: CHQTOOK010...
Mike Swirad

Vice President, Quality
Valcor Engineering Corporation
mikeswirad@valcor.com