



10CFR21 NOTIFICATION LETTER

January 13, 2020

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington D.C. 20555-0001

Subject: 10CFR21 Notification for Ashcroft 2-1/2" & 3-1/2" 1009, 63mm 2008, 63mm & 100mm 1008 Industrial Gauges, Weksler 3-1/2" Regal Gauges

The purpose of this letter is to provide the NRC with a report in general conformity of the requirements of 10CFR Part 21.21. On December 27, 2019 United Controls International (UCI) received a Product Advisory Letter from Ashcroft Inc, dated December 2, 2019 (attached) informing of a potential error in the tip material used on Ashcroft 2-1/2" and 3-1/2" model 1009, 63mm model 2008, 63mm and 100mm model 1008 industrial gauges along with Weksler 3-1/2" regal gauges. Refer to attached Ashcroft Inc. Product Advisory Letter dated December 2, 2019 for specific configuration and model numbers affected. Due to a supplier issue, 304SS tip material may have been supplied on the subject gauges instead of the specified 316SS material. In certain applications, the 304SS tip material may be subjected to accelerated oxidation or degradation, resulting in potential release of process media. However, no detrimental effects are expected in non-corrosive applications (i.e. water with neutral, oils/hydraulic fluids, non-corrosive gasses such as air and nitrogen, anhydrous ammonia and ammonia refrigerant).

Required information as per 10CFR Part 21.21(d)(4) follows:

- (i) ***Name and Address of the individual or individuals informing the Commission***
Rob Hale
President
United Controls International
205 Scientific Drive
Norcross, GA 30092

- (ii) ***Identification of the facility, the activity, or the basic component supplied for such facility or such activity within the United States which fails to comply or contains a defect.***
Ashcroft 2-1/2" and 3-1/2" model 1009, 63mm model 2008, 63mm and 100mm model 1008 industrial gauges along with Weksler 3-1/2" regal gauges. Refer to attached Ashcroft Inc. Product Advisory Letter dated December 2, 2019 for specific configuration and model numbers affected.

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- (iii) ***Identification of the firm constructing the facility or supplying the basic component which fails to comply or contains a defect.***

United Controls International
205 Scientific Drive
Norcross, GA 30092

- (iv) ***Nature of the defect or failure to comply and the safety hazard which is created or could be created by such defect or failure to comply.***

Due to a supplier issue, 304SS tip material may have been supplied on the subject gauges instead of the specified 316SS material. In certain applications the 304SS tip material may be subjected to accelerated oxidation or degradation, resulting in potential release of process media. However, no detrimental effects are expected in non-corrosive applications (i.e. water with neutral, oils/hydraulic fluids, non-corrosive gasses such as air and nitrogen, anhydrous ammonia and ammonia refrigerant).

- (v) ***The date on which the information of such defect or failure to comply was obtained.***

December 27, 2019

- (vi) ***In the case of a basic component which contains a defect or fails to comply, the number and location of these components in use at, supplied for, being supplied for, or may be supplied for, manufactured or being manufactured for one or more facilities or activities subject to the regulations in this Part.***

Part Number	Utility	Purchase Order	Quantity
251009SWL01L0400	Georgia Power – Hatch	SNG27679-0694	3
101008S02B160#/KP	Alabama Power – Farley	SNA27679-0585	2



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- (vii) ***The corrective action which has been, is being, or will be taken; the name of the individual or organization responsible for the action; and the length of time that has been or will be taken to complete the action.***

The manufacturer of the subject items (Ashcroft Inc.) has identified that the supplier material issues affect only the identified items manufactured from October 2017 through October 2019. Utilities utilizing affected items are advised to evaluate whether the items would be subject to accelerated oxidation or degradation in the installed environment as described in the Ashcroft Inc. Product Advisory Notice dated December 2, 2019 (attached). If it is determined that accelerated oxidation or degradation applies to the items then they are to be returned for replacement with items manufactured with the correct 316SS tip material.

UCI shall implement a corrective action implementing the following:

The utilities that were supplied with affected items by UCI have been notified of this issue. Items supplied to Georgia Power – Hatch were not installed and are being returned for replacement. UCI is awaiting evaluation by Alabama Power – Farley as to whether replacement of items is required.

The dedication plan for supplied items includes material verification of wetted components including the bourdon tube and process connections; however, verification of the bourdon tube tip material was not included. The dedication plans for the subject items shall be revised to include verification of tip material as 316SS for all future orders along with inspection of manufacture date to ensure that items manufactured between October 2017 and October 2019 are not supplied.

Training of dedication personnel regarding this issue and identification of wetted components for material verification during dedication.

- (viii) ***Any Advice related to the defect or failure to comply about the facility, activity, or basic component that has been, is being, or will be given to purchasers or licensees.***

The manufacturer of the subject items (Ashcroft Inc.) has identified that the supplier material issues affect only the identified items manufactured from October 2017 through October 2019. Utilities utilizing affected items are advised to evaluate whether the items would be subject to accelerated oxidation or degradation in the installed environment as described in the Ashcroft Inc. Product Advisory Notice dated December 2, 2019 (attached). If it is determined that accelerated oxidation or degradation applies to the items then they are to be returned for replacement with items manufactured with the correct 316SS tip material.



- (ix) *In the case of an early site permit, the entities to whom an early site permit was transferred.*
Not Applicable.

If you have any questions or wish to discuss this matter or this report, please contact:

Wesley Hickle
Engineering Manager
whickle@unitedcontrols.com
770-496-1406 x 165

Sincerely,

A handwritten signature in black ink that reads 'Rob Hale'. The signature is written in a cursive, flowing style.

Rob Hale
President
United Controls International

Attachment: Ashcroft Product Advisory Letter



Protecting our customers' people, processes and profits.

December 2, 2019

PRODUCT ADVISORY LETTER

**Ashcroft® 2½” and 3½” 1009, 63 mm 2008,
63 mm & 100 mm 1008 Industrial Gauges, Weksler 3½” Regal Gauges:**

- Ashcroft® 251009SW industrial gauges in ranges of Vacuum, Compound, 15psi through 600psi with date codes Oct 2017 to Oct 2019. (Excludes 251009AW Gauges)
- Ashcroft® 351009SW industrial gauges in ranges of Vacuum, Compound, 15psi through 600psi with date codes Oct 2017 to Oct 2019. (Excludes 351009AW Gauges)
- Ashcroft® 632008S industrial gauges in ranges of Vacuum, Compound, 15psi through 600psi with date codes Oct 2017 to Oct 2019.
- Ashcroft® 631008S industrial gauges in ranges of Vacuum, Compound, 15psi through 600psi with date codes Oct 2017 to Oct 2019. (Excludes Center Back gauges)
- Ashcroft® 101008S industrial gauges in ranges of Vacuum, Compound, 15psi through 600psi with date codes Oct 2017 to Oct 2019. (Excludes Center Back gauges)
- Weksler® BA43, BS43, BY43 Regal industrial gauges in ranges of Vacuum, Compound, 15psi through 600psi with date codes Oct 2017 to Oct 2019.
- Weksler® BM43 & BN43 Regal Altitude Gauges with date codes Oct 2017 to Oct 2019.
- Weksler® BP43 & BQ43 Regal Refrigerant and Ammonia Gauges with date codes Oct 2017 to Oct 2019.

(See figure 3 for visual identification of gauge models and figure 4 for other pressure units)

This letter is to alert you to a potential error in the tip material used on certain models of Ashcroft® Model 1008, 2008 and 1009 pressure gauges. We have determined that due to a supplier issue, 304SS tip material may have been supplied on some 1008, 2008 and 1009 gauges instead of the specified 316SS material. The gauges in question were shipped from October of 2017 through October 2019. (PLEASE NOTE: Bourdon tube material for all gauges was supplied with the correct 316SS material.)

In certain applications the 304SS tip material (see figure 1 below) may be subject to accelerated oxidation or degradation, resulting in the potential release of process media. However, no detrimental effects are expected in non-corrosive applications (i.e. water with neutral, oils/hydraulic fluids, non-corrosive gasses such as air and nitrogen, anhydrous ammonia and ammonia refrigerant). For additional corrosive information, please refer to our [Ashcroft Corrosion Guide](#).

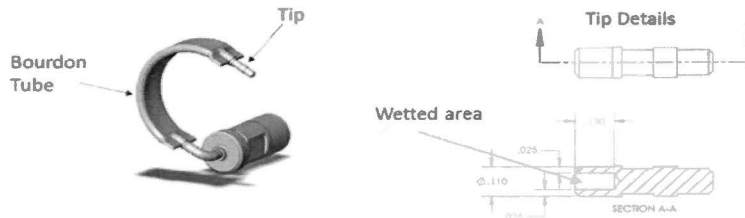


Figure 1 – C-type Bourdon Tube Assembly with Tip Details

Ashcroft Inc., 250 East Main Street, Stratford, CT 06614 | 800-328-8258 | info@ashcroft.com | www.ashcroft.com

The date code can be found on a label on the back of the gauge with the month and year of manufacture or the gauge box (see figure 2).

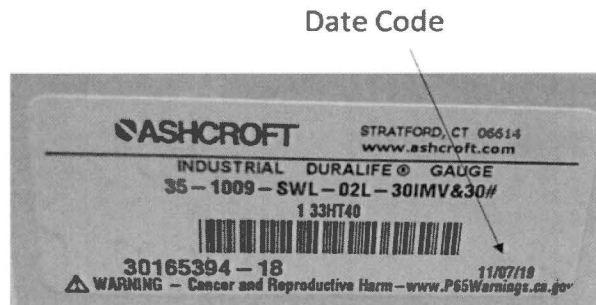
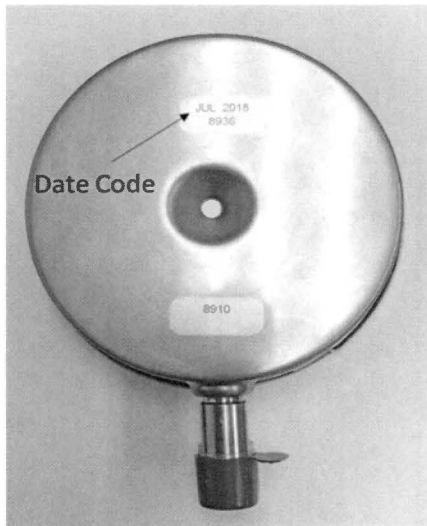


Figure 2 –Date Code Label

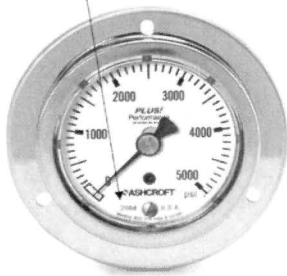
Ashcroft is committed to the satisfaction of our customers and to the performance of our products. We apologize for any inconvenience this may cause you.

These pressure gauges can be returned for replacement. Please contact your Ashcroft supplier or go to <https://sales.ashcroft.com/rma-form> to obtain an RMA and information on how ship the gauges back to Ashcroft.

If you have technical questions regarding your specific application and potential corrosion issues, please contact:

Jeremy M. Payne
Materials and Test Engineering Manager
Ashcroft Inc.
250 East Main St.
Stratford, CT 06614-5145, USA
Phone: +1-203-385-0564
Mobile: +1-203-767-6236
E-mail: jeremy.payne@ashcroft.com

2008 printed on the Dial



63 mm 2008 Gauges

DURALIFE printed on the Dial

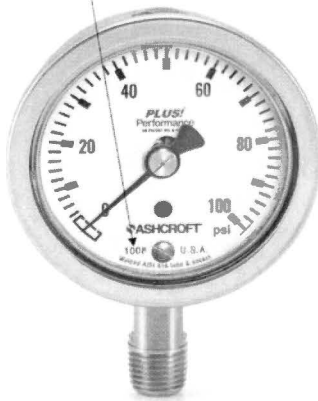


2½" 1009SW or
3½" 1009SW Gauges

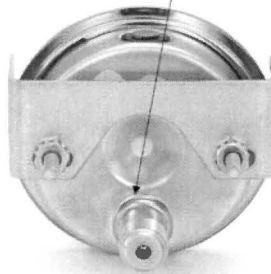


2½" 1009AW or
3½" 1009AW Gauges
are not part of the
product advisory

1008 printed on the Dial

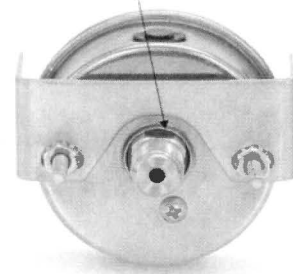


Lower Back



Includes both
lower and lower
back gauges

Center Back



1008 Center back gauges
are not part of the
product advisory

63 mm 1008 and 100 mm 1008 Gauges not Including Center back Gauges

Figure 3 – Visual Identification of 1008, 2008 and 1009 gauges

psi	bar	kPa	Mpa	kg/cm ²
30IMV	-1BR	-100KP	-.1MP	-1KSC
-	-1&.6BR	-100&60KP	-.1&.06MP	-1&.6KSC
30IMV&15#	-	-	-	-
-	-1&1.5BR	-100&150KP	-.1&.15MP	-1&1.5KSC
30IMV&30#	-	-	-	-
-	-1&3BR	-100&300KP	-.1&.3MP	-1&3KSC
30IMV&60#	-	-	-	-
-	-1&5BR	-100&500KP	-.1&.5MP	-1&5KSC
30IMV&100#	-	-	-	-
-	1&9BR	100&900KP	.1&.9MP	1&9KSC
15#	1BR	100KP	.1MP	1KSC
20#	-	-	-	-
-	1.6BR	160KP	.16MP	1.6KSC
30#	-	-	-	-
-	2.5BR	250KP	.25MP	2.5KSC
60#	4BR	400KP	.4MP	4KSC
-	6BR	600KP	.6MP	6KSC
100#	-	-	-	-
120#	-	-	-	-
-	10BR	1000KP	1MP	10KSC
160#	-	-	-	-
200#	-	-	-	-
-	16BR	1600KP	1.6MP	16KSC
300#	-	-	-	-
-	25BR	2500KP	2.5MP	25KSC
400#	-	-	-	-
500#	-	-	-	-
600#	40BR	4000KP	4MP	40KSC

Figure 4 – Gauge ranges including in the advisory