



Corrective Action 1323  
Carondelet Division - CA / PA / RGA Database  
Corrective Action Type NCR  
Date 7/27/2005  
CA Originator C. Ruud  
Applies to: Coil castings C-1, C-2, C-3, C-4 and A-1 and C 1 shim and four C coil and six A coil shims

**Description of Defect / Non-Conformance**

Phosphorus levels in material produced to date exceed specification limits. Both phosphorus and sulfur readings reported erroneously in certifications.

Certification reports have shown phosphorus and sulfur levels in the <.01% range. Independent laboratory data confirmed phosphorus in the .018 to .033% range and sulfur in the .005 to .022% range. Actual levels of some tests are above those in PPPL Specification NCSX-CSPEC-141-03-07 Rev 7.

Nonconformance was first suspected as a result of analysis of zoned attached test specimens volunteered by MetalTek International as response to PPPL questions on weighted average chemical analysis and quality of blending in the gating system. Nonconformance was verified on the bars used in the study and has been extended to evaluation of previously poured products.

**Root Cause**

Specification limits were set below the levels achievable through use of available raw materials. Spectrometer did not properly calibrate for phosphorus and sulfur at levels of specification due to equipment malfunction.

The chemical specification of EIO heats uses alloy CF8MNMn-Mod which incorporates a type standard calibration with a certified reference material (CRM) BS180. This enables the operator of the spectrometer to match the elemental concentrations of this alloy with corrective factors. These factors are determined by analyzing the CRM and having them compared with the calibration curves for each element. The phosphorus and sulfur content have very low measured intensities due to low concentrations. Intermittent failure of the spectrometer intensity measuring card caused higher intensity readings for phosphorus and sulfur. Subsequent checks with the CRM resulted in low corrective factors that were not detected. This in turn resulted in low reported concentrations for the EIO samples. All the major elements, which are measured on other intensity cards, have been closely monitored and matched very well with the CRM and thus were reported correctly.

**Corrective Action**

Modification to specification for phosphorus and sulfur will be requested. Limits will be set based on process capability and consistent with other stainless steel grades. Replacement of deficient card in spectrometer will be made upon delivery.

Subsequent immediate analysis of chemistry results, obtained by wet analysis, is attached and demonstrate top of specification for sulfur and over specification for phosphorus. The spectrometer manufacturer has performed an analysis to determine the cause of the malfunction and verified that the intensity card has an intermittent fault and must be replaced. The card has been ordered and scheduled for replacement on August 15, 2005.

Until the card is replaced we will be performing additional type standardizations to ensure accurate sulfur and phosphorus analysis. Additionally, for coils made until the card is replaced, an independent laboratory will perform a verification of the chemical analysis.

**Verification of Corrective Action**

Will be determined at a later date.

**Preventive Action**

In addition to spectrometer faults, we have identified that the specification ranges for sulfur and phosphorus is unattainable. Analysis and specifications for virgin charge materials predict sulfur at 0.040% maximum and phosphorus at 0.040% maximum. We have no way to remove phosphorus from the melt and do not intentionally add phosphorus. So, the confirmed coil analyses, along with analyses of virgin material heats, demonstrate sulfur in the range of 0.010% to 0.022% and phosphorus in the range of 0.018% to 0.033%. These results are consistent with our charge material analysis. We will request a deviation for phosphorus in the subject parts and also request a permanent specification change to 0.040% maximum for both phosphorus and sulfur, to allow us to provide non-discrepant material. This change will not affect, in any way, the physical properties or material performance because all coils and test material exhibited sulfur and phosphorus within the new ranges despite inaccurate reporting. Other actions: Specifications have been added to the BS 180 standard and the type standard will be measured against the criteria.

**Estimated Completion Date**

August 15, 2005

**Actual Completion Date** TBD

Signed: C. Ruud



CC: Jim Galaske, Barry Craig, Joe Edwards, E.J. Kubick

### Guide to St Louis Testing Report Dated 7-26-05

Sample name	Sample origin
A1Z1	Cast on bar A-1 coil, zone 1
A1Z2	Cast on bar A-1 coil, zone 2
A1Z3	Cast on bar A-1 coil, zone 3
C1	Cast on bar C-1 coil
C2Z1	Cast on bar C-2 coil, zone 1
C2Z2	Cast on bar C-2 coil, zone 2
C2Z3	Cast on bar C-2 coil, zone 3
C3Z1	Cast on bar C-3 coil, zone 1
C3Z2	Cast on bar C-3 coil, zone 2
C3Z3	Cast on bar C-3 coil, zone 3
F1	Final analysis button from ladle for C-4 coil
F2	Final analysis button from ladle for C-4 coil
F3	Final analysis button from ladle for C-4 coil
P1	Preliminary analysis button from ladle for C-4 coil

Testing is underway of the heat used to pour the four C coil and six A coil shims.



Attachment to  
CA 1323

Chemical, Metallurgical, Mechanical, Nondestructive, Environmental Testing, Analyses and Field Service.

July 26, 2005  
Lab No. 05C-0608  
Invoice No. 59891  
P.O. No. 21324  
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**METALTEK INTERNATIONAL**  
8600 Commercial Blvd.  
Pevely, MO 63070

**Attention: Chuck Ruud**

**REPORT OF CHEMICAL ANALYSIS**

**SAMPLE ID:** A1 Z1, A1 Z2, A1 Z3, C1, C2 Z1, C2 Z2, C2 Z3,  
C3 Z1, C3 Z2, C3 Z3, F1, F2, F3, P1

**RESULTS: %**

ANALYTE	A1Z1	A1Z2	A1Z3
Sulfur	.013	.005	.010
Phosphorus	.025	.023	.018

ANALYTE	C1	C2Z1	C2Z2	C2Z3
Sulfur	.014	.022	.018	.015
Phosphorus	.018	.024	.021	.025

ANALYTE	C3Z1	C3Z2	C3Z3
Sulfur	.013	.014	.012
Phosphorus	.024	.025	.021

ANALYTE	F1	F2	F3	P1
Sulfur	.014	.015	.012	.010
Phosphorus	.029	.033	.028	.030

Sulfur Test Method: ASTM E1019-03

Phosphorous Test Method: Colormetric

Identification of tested specimen provided by the client.

Robin E. Sinn  
Laboratory Director

RES/nmc

