September 17, 2015

Mr. Dan Grannan, Quality Director
Specialty Maintenance and Construction, Inc.
A Division of Metaltek International
4015 Drane Field Rd.
Lakeland, FL 33811

SUBJECT: SPECIALTY MAINTENANCE AND CONSTRUCTION INC. RESPONSE TO THE U.S. NUCLEAR REGULATORY COMMISSION INSPECTION REPORT NO. 99901439/2015-201 AND NOTICE OF NONCONFORMANCE

Dear Mr. Grannan:

Thank you for your August 18, 2015, letter in response to the Notice of Nonconformances (NON) that were discussed in the subject U.S. Nuclear Regulatory Commission (NRC) inspection report (IR).

We have reviewed your letter and found that it is not fully responsive to NONs 99901439/2015-201-01 and 99901439/2015-201-02. Specifically, with respect to your response to NON 99901439/2015-201-01:

a. Section 3.8.3.6.2, "Nondestructive Examination," of Revision 19 of the AP1000 design certification document (DCD), which is incorporated in the Combined License (COL) for Vogtle Electric Generating Plant (VEGP) Units 3 and 4 and Virgil C. (VC) Summer Generating Station, Units 2 and 3 states, in part, that "partial joint penetration (PJP) welds shall be visually inspected for 100 percent of their length," and "PJP welds shall also be inspected by magnetic particle or liquid penetrant examination for 10 percent of their length." Provide objective evidence that SMCI adequately incorporated the general notes concerning NDE requirements from the Westinghouse Electric Company (WEC) design specification drawings, which are derived from the requirements from Section 3.8.3.6.2 of the AP1000 DCD. As discussed during the NRC inspection of SMCI, this objective evidence could be in the form of a letter documenting WEC's official position from its structural design engineering and welding engineering representatives stating that the PJP is not required to be VT and MT examined, and that it this still meets WEC's design stress requirements, including the requirements in Revision 19 of the AP1000 DCD, which is incorporated in the COL for VEGP and VC Summer.

b. Currently, SMCI does not perform a VT and MT examination of the PJP weld, which provides the majority of weld strength, and therefore represents a larger load carrying capacity than the reinforcing fillet weld in meeting the design stress requirements. Since SMCI currently only performs a VT and MT examination of the reinforcing fillet welds, and not the PJP welds, this leaves the quality of the PJP welds to be indeterminate, and therefore, affects how these welds would meet their design stress requirements and would perform their intended safety. Provide the extent of condition for not performing the inspections of the PJP welds.

With respect to your response to NON 99901439/2015-201-02, clarify your response as follows:

a. The response did not address the NON in regards to providing objective evidence that there was adequate weld filler metal control. Specifically, as detailed in the NRC inspection report No. 99901439/2015-201, dated July 24, 2015, the NRC inspection team noted the following:

    1. Welders 121 and 140 were not issued any welding filler metal for the following:

        i. Welds on embed plates on October 8, 2014, for traveler 926-CA01-01156 for the CA-01 module for VEGP Unit 3 performed by welder 121.

        ii. Welds on embed plates on October 8, 2014, for traveler 926-CA01-01162 for the CA-01 module for VC Summer Generating Station Unit 2 performed by welders 121 and 140.

    2. Welder No. 72 used filler metal MI-15709, Heat/Lot No. 95138 to weld the beam seat as documented on traveler 926-CA01-00774, contrary to the filler metal he was issued and required to use (issued filler metal MI-15765, Heat/Lot No. 10285) for welding on module CA-01 (steam generator and refueling canal module) for VC Summer Generating Station Unit 2, on September 29, 2014.

    Provide objective evidence that the correct filler metal was used for each of the above welds, and that there was adequate control of the welding filler metal, since use of the incorrect welding filler metal or a contaminated welding filler metal (if not adequately controlled) on safety related components that are not qualified may reduce the strength of the welds affecting the components' ability to perform its intended safety function.

b. At the conclusion of the inspection on June 12, 2015, the NRC inspection team found that weld filler metal was not recorded on form WCIL-001 for the time period of June 28, 2014 through July 11, 2014, as required by Section 5.3.8 of QP-9.0. However, your response states that during the period the NRC inspection team was at SMCI, a search was conducted for the missing weld wire issue logs and all logs except for those dated July 7-9 were located. Confirm that after the NRC inspection team completed its inspection, SMCI located the missing weld logs (form WCIL-001). In addition, provide these recovered weld logs (form WCIL-001) for this time period of June 28, 2014 through July 11, 2014.

c. The corrective action that will be taken for this NON is only to clarify the retention period of the weld consumable issuance log. However, the issue concerning NON 99901439/2015-201-02 was not the retention period for the Weld Consumable Issuance Logs, but the lack of control of filler metal by not following the procedure for issuance and controlling filler metal to ensure that it is used for its intended purposed and does not get contaminated. Therefore, provide the corrective action taken concerning the lack of filler metal control for welders identified on the applicable travelers.

d. There is no action specified in the response to avoid future non-compliance associated with this NON, which is not following the filler metal issuance procedure for ensuring control of filler metal by providing traceability and accountability of filler metal so that it is used as intended. Therefore, provide the corrective actions that will be taken to avoid future non-compliances concerning filler metal control.

e. Clarify and explain how long a welder can keep weld filler metal once issued, since the response is not clear whether filler metal can be kept out past a welders shift.

f. Explain what the specific change will be for procedure QP-9.0 in addressing this NON, since this was not addressed in the response.

g. Explain what objective evidence exists that a welder uses a particular filler metal as issued, since based on your response, the welder does not sign for each date that actual welding has been performed. The welder only signs when the joint is complete, as specified in your response; which could actually involve several days of welding or work.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390 “Public Inspections, Exemptions, Requests for Withholding,” of the NRC's "Rules of Practice, "a copy of this letter, its enclosure(s), and your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC’s Agencywide Documents Access and Management System, accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request that such material is withheld from public disclosure, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21 “Protection of Safeguards Information: Performance Requirements.”

Please contact Mr. Yamir Diaz-Castillo at 301-415-2228, or via electronic mail at Yamir.Diaz-Castillo@nrc.gov, if you have any questions or need assistance regarding this matter.

Sincerely,

/RA/ (RMcIntyre for)

Edward H. Roach, Chief
Mechanical Vendor Inspection Branch
Division of Construction Inspection
and Operational Programs
Office of New Reactors

Docket No.: 99901439

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DATE	09/15/15	09/16/15	09/17/15

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