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 RECIPIENT NAME      RECIPIENT AFFILIATION  
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SUBJECT: Responds to NRC 930111 ltr re violations noted in insp repts  
 50-269/92-29, 50-270/92-29 & 50-287/92-29. C/As: NDE inspectors  
 will be informed that sampling nozzle safe end be made of  
 nonferrous metal & sampling nozzle be made of carbon.

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**DUKE POWER**

February 8, 1993

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

Subject: Oconee Nuclear Site  
Docket Nos. 50-269, -270, -287  
Inspection Report 50-269, -270, -287/92-29  
Reply to Notice of Violation

Dear Sir:

By letter dated January 11, 1993 the NRC issued a Notice of Violation as described in Inspection Report No. 50-269/92-29, 50-270/92-29, and 50-287/92-29.

Pursuant to the provision of 10 CFR 2.201, I am submitting a written response to the violation identified in the above Inspection Report.

Very truly yours,

for J. W. Hampton

cc: Mr. S. D. Ebnetter, Regional Administrator  
U. S. Nuclear Regulatory Commission, Region II

Mr. L. A. Wiens, Project Manager  
Office of Nuclear Reactor Regulation

Mr. P. E. Harmon  
Senior Resident Inspector  
Oconee Nuclear Site

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VIOLATION 269,270,287/92-29-01, SEVERITY LEVEL IV

10 CFR 50, Appendix B, Criterion V requires activities affecting quality to be accomplished in accordance with procedures. Procedure NDE-35, "Liquid Penetrant Testing" Revision 13, Figure 3, specifies that the area of interest for liquid penetrant examination for reactor coolant pressure boundary butt welds is the weld and the one half inch of adjacent base material on each side of the weld.

On December 15, 1992, procedure requirements were not followed for liquid penetrant examination. One half inch of adjacent base material upstream of reactor coolant pressure boundary weld 1PRZ-WP63-7, a pressurizer nozzle to safe end butt weld, was not examined during the liquid penetrant examination of that weld.

RESPONSE:

1. The reason for the violation, or, if contested, the basis for disputing the violation:

The drawing referenced in the ISI plan is an isometric without reference dimensions. The drawing identified the weld in question as the second weld out from the pressurizer on the nozzle and identified it as 1PZR-WP63-7. Due to nozzle configuration, the inspector thought the weld was located at the end of the taper, but could not determine the exact location. Being uncertain, the inspector examined the shiny surface (safe end) out to the pipe safe end weld.

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

Drawings showing weld configuration and location were acquired and given to all inspectors who perform PT exams on the pressurizer nozzles.

Weld 1PZR-WP63-7 was reinspected the following day in accordance with procedure NDE-35. In addition, it was verified that the previously examined nozzles were inspected in accordance with the procedure.

Drawing ISI-OCN1-002 was used to identify weld 1PZR-WP63-7, under the Weld List, Identification No. WP-63-7, Piece No. 42 to 30. Listed in the Bill of Material, Piece No. 42 is described as Sampling Nozzle Safe End, material SB-166, and Piece No. 30 as Sampling Nozzle, material SA. 508 GR. B.

3. The corrective steps that will be taken to avoid further violations:

NDE inspectors will be instructed to seek assistance when there is confusion or uncertainty of any weld location. They will also be instructed to ensure that the examination is done in accordance with the appropriate NDE procedure ensuring that the test boundary is examined.

In addition, NDE inspectors will be informed that the sampling nozzle safe end (Piece. No. 42) is made of nonferrous metal and the sampling nozzle (Piece No. 30) is made of carbon and alloy steel.

A note will be added to NDE Procedures NDE-25 (Magnetic Particle Examination and Techniques) and NDE-35 (Liquid Penetrant Examination) stating that detailed drawings may be required for proper weld location and to ensure complete examination coverage.

In the future when drawing ISI-OCN1-002 is used to identify a nozzle to safe end weld, a detailed drawing of the nozzle will be provided for reference.

These items will be completed before the next refueling outage, Unit 2 End of Cycle 13, currently projected to start April 14, 1993.

4. The date when full compliance will be achieved:

Full compliance was achieved on December 16, 1992 when the weld was properly inspected.