

PP&L

TWO NORTH NINTH STREET, ALLENTOWN, PA. 18101 PHONE: (215) 821-5151

March 19, 1979

Mr. Robert T. Carlson, Chief
Reactor Construction and Engineering Support Branch
U. S. Nuclear Regulatory Commission
621 Park Avenue
King of Prussia, Pennsylvania 19406

SUSQUEHANNA STEAM ELECTRIC STATION
NRC INSPECTION OF JANUARY 30-FEBRUARY 2, 1979
REPORT NO. 50-387/79-03
ER 100450 FILE 840-4
PLA-334

Dear Mr. Carlson:

Reference is to your letter of February 20, 1978 forwarding IE Inspection Report No. 50-387/79-03 and Appendix A thereto, "Notice of Violation".

Your letter advised that PP&L was to submit within 30 days of receipt a written explanation addressing: (1) corrective steps which have been taken and the results achieved, (2) corrective steps which will be taken to avoid further items of noncompliance, and (3) the date when full compliance will be achieved.

The Notice of Violation (infraction) states as follows and the respective corrective measures are detailed below:

10CFR50, Appendix B, Criterion IX, states, in part, that: "Measures shall be established to assure that special processes, including welding,... are controlled and accomplished... in accordance with applicable codes, (and) specifications..."

Section D.3.3.7 of Appendix D of the Susquehanna PSAR states, in part, that: "Use of qualified procedures and application thereof as required by established codes and standards will be rigidly enforced on all Bechtel vendors, subcontractors and Bechtel personnel."

Bechtel Specification 8856-C-66, Revision 2, states, in part in Paragraph 6.2, that: "Welding shall be in accordance with the 'Structural Welding', AWS D1.1, Revision 1-76..."

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AWS D1.1, Revision 1-76, "Structural Welding Code," states, in part in paragraph 4.4, that: "Cracks or blemishes caused by arc strikes shall be ground to a smooth contour and checked to ensure soundness."

Contrary to the above, on February 2, 1979, several arc strikes were observed on structural steel members of the Reactor Building Superstructure and the licensee could produce no evidence that QA program (welding) controls had been established to properly identify, evaluate, and disposition such arc strikes.

(1) Corrective steps which have been taken and the results achieved:

- (a) Cives Steel revised their procedure, Field Touch-Up 1, Revision A, that relates to touch-up painting of structural steel members in the field. Paragraph 3.2 of this procedure, Surface Preparation, now requires the removal of arc strikes along with slag, weld spatter, etc. Bechtel Engineering has accepted this revision by designating a Level 1 approval.
- (b) Cives QC personnel reinspected structural steel members in Unit 1 to assure that all arc strikes were identified for removal. For work currently in progress on Unit 2, the touch-up painters have been instructed to remove all arc strikes identified by the crafts and Cives QC personnel. As noted in the Cives QC reinspection report a check is to be made for any remaining arc strikes prior to the QC inspector's sign off of the touch-up report.

(2) Corrective steps which have been taken to avoid further items of noncompliance:

Cives Steel revised their Welding Instruction, WPS-3, that relates to general field welding requirements and training program. Item "S" of this procedure has been revised to read, "Every effort should be made to remove arc strikes; however, blemishes caused by arc strikes will be removed by the welder at the time the weld is completed."

The revised instruction should greatly minimize the probability of arc strikes going undetected. Any remaining arc strikes will be identified for correction by Cives QC personnel during their inspection of touch-up painting in accordance with their revised procedure, Field Touch-Up 1. Based upon the action taken by the subcontractor, adequate control has been established to conform to AWS requirements..

(3) The dates when full compliance was achieved:

- (a) Procedure Field Touch-Up 1 was revised on 2-8-79 and Bechtel Engineering designated their approval of the revision on 2-14-79.
- (b) Welding Instruction, WPS-3, was revised on 2-8-79 and copies were distributed to welding supervisors and welders.

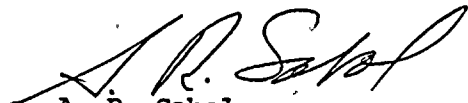


(c) The reinspection of Unit 1 for arc strikes was completed on 2-23-79.

Bechtel QA has verified that the above actions have been completed and that the specific arc strikes identified by the NRC inspector have been corrected.

We trust the Commission will conclude that the actions taken to date are adequate.

Very truly yours,



A. R. Sabol
Manager-Nuclear Quality Assurance

CIM:mcb

cc: Mr. Robert M. Gallo
U. S. Nuclear Regulatory Commission
P. O. Box 52
Shickshinny, Pennsylvania 18655

