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July 16, 1979

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

The tack welds on weld joint DCA-141-1-FW2 were removed. However, their removal was not an action taken to correct the condition cited by the NRC inspector, i.e., failure to verify and document purge gas application prior to tack welding; but, rather, they were removed by second shift craft personnel because of an interference problem.

In assessing the infraction, we conclude that clarification rather than corrective action is warranted in this situation for the following reasons:

- Tack welds are used to maintain proper alignment until final welds are made and are reconsumed by heat input at the time the root pass is welded.
- A gas purge is used during tack welding; however, the QC Welding Engineer does not verify and document this by signoff on the WR-5 Form.
- When alignment and tack welding are completed, fit-up inspection is conducted by the QCWE. This inspection consists of a 100% visual examination for the presence of oxidation, defects, etc. in the tack welds. This inspection of completed tack welds provides an assessment of weld quality and is a reflection on the process controls applied during the tack welding operation.
- During the fit-up inspection and just prior to initiation of the root pass, the QCWE verifies and documents purge gas application by signoff on form WR-5, Item 13.

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

On May 14, 1979, a request for an amendment to BQAM Appendix 3, paragraph 7.4, Item (13) of Welding Standard WD-1 was submitted to Bechtel's San Francisco Home Office via CMO-1668 dated May 14, 1979. The amendment was submitted to preclude any such misunderstanding regarding the welding standard from occurring in the future.

The revised paragraph 7.4, Item (13) of WD-1 will read as follows:  
"For each weld which requires a purge, the LWQCE shall check before welding begins to verify to his satisfaction that purging is being performed as required by the applicable procedures and job specification and initial and date the space provided. Tack welds shall be inspected by the LWQCE at the time of fit-up inspection, and if they are oxidized on their interior surface, they shall be removed prior to release for welding."

## (3) The date when full compliance will be achieved:

Approval and issuance of the BQAM amendment is anticipated by July 31, 1979.

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Item B of the Notice of Violation (Deficiency) states as follows and the corrective measures are detailed below:

10CFR50, Appendix B, Criterion XIII, states, in part: "Measures shall be established to control the...storage...and preservation of material and equipment in accordance with work and inspection instructions...."

The Susquehanna PSAR Section D.2.13 states, in part: "The applicant's Quality Assurance Program will require written instructions and procedures for...storage...and preservation requirements."

The General Electric Installation and Service Engineering Nuclear Quality Assurance Manual, Revision 0, Section 9.6.2, states, in part: "The service manager shall provide written handling and storage procedures when required by the design specification."

Contrary to the above, as of April 25, 1979, no written instructions had been provided to control the storage and maintenance of the Unit 1 Reactor Pressure Vessel.

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

GE/I&SE submitted to Bechtel and GE/NEEG an instruction for the "Inspection of RPV Stud Holes" via FSC-80-78024 on April 27, 1979. This instruction formally documents verbal instructions which had previously been used as the basis for the stud hole inspections conducted on July 20 and September 20, 1978, and February 15 and April 26, 1979.

(2) Corrective steps which have been taken to avoid further items of non-compliance:

GE/I&SE has reviewed FDDR KRI-038 and specification 22A 2724 for additional applicable storage requirements and has concluded that no additional storage instructions are required.

(3) The date when full compliance was achieved:

The instruction for RPV stud hole inspections received final approval on June 5, 1979 and the GE/I&SE review was completed and was verified by Bechtel QA on June 28, 1979.

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

Very truly yours,



A. R. Sabol  
Manager-Nuclear Quality Assurance

JRB:mcb