

PP&L

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July 3, 1980

Mr. Robert T. Carlson
Chief RC & ES Branch
U. S. Nuclear Regulatory Commission
631 Park Avenue
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SUSQUEHANNA STEAM ELECTRIC STATION
NRC INSPECTION OF MARCH 24-28, 1980
REPORT NO. 50-387/80-05 AND 50-388/80-03
ERs 100450/100508 FILE 840-4
PLA-504

Dear Mr. Carlson:

Reference is to your letter of May 22, 1980 which forwarded combined IE Inspection Reports 50-387/80-05 and 50-388/80-03 and "Appendix A, Notice of Violation."

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

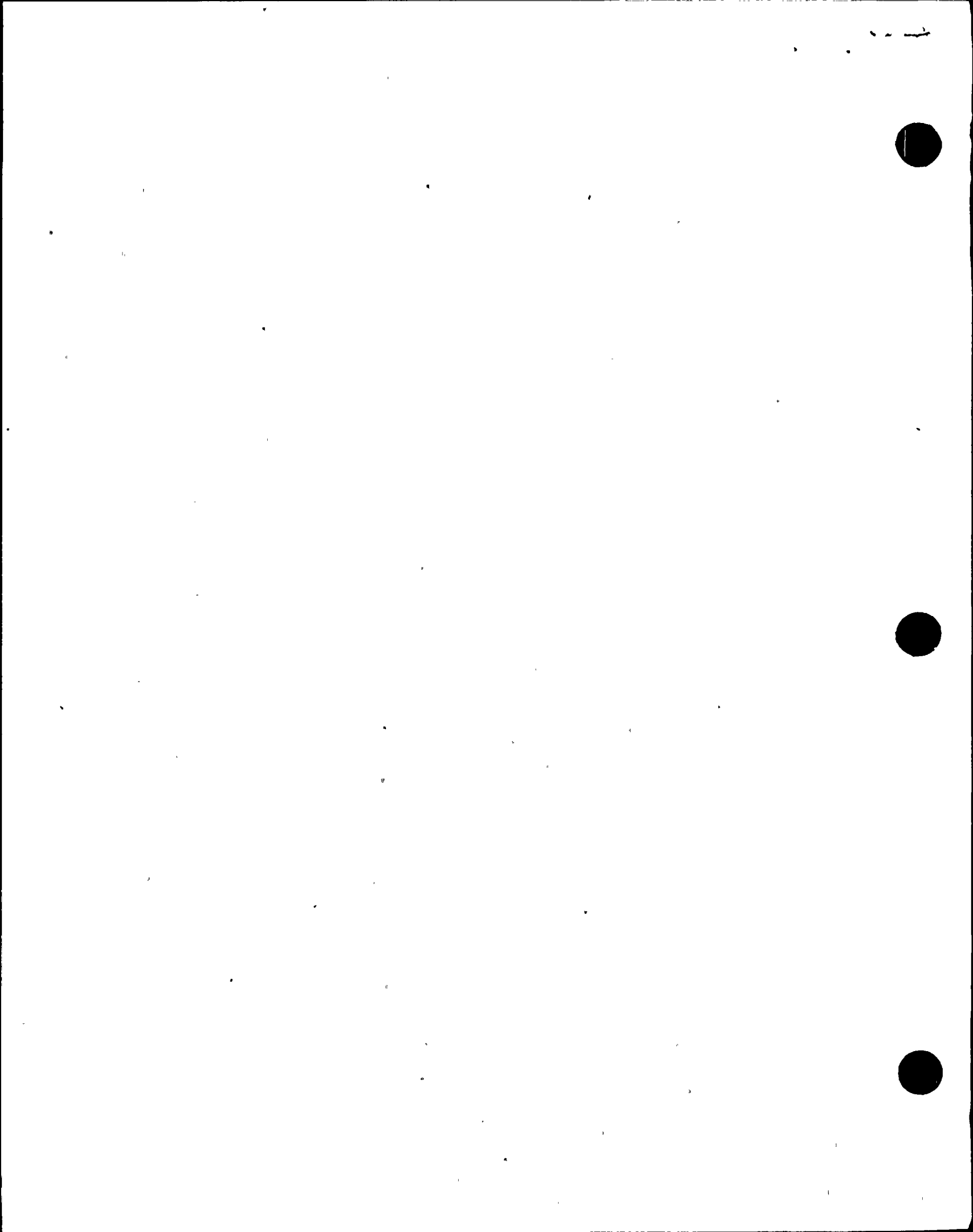
The Notice of Violation (Infraction) states as follows:and the corrective measures are detailed below:

10CFR50, Appendix B, Criterion XV, requires, in part, that: "Nonconforming items shall be reviewed and accepted, rejected, repaired, or rework in accordance with documented procedures."

The Susquehanna PSAR, Appendix D, paragraph D.3.3.13, states, in part, that: "For nonconforming items which may be made usable through rework, repairs or modification of requirements, reports are prepared and submitted to the project engineering team for resolution."

The Bechtel Quality Assurance Manual, ASME-Section III, Division 1, Section 5723, states, in part,: "1) An NCR is prepared when a nonconformance is identified by inspection or another means."

Contrary to the above, on March 27, 1980, a quality control inspector identified the root gap spacing as being in excess of 5/32" on pipe weld joint GBB-104-1-FW-16-R1. The specified welding procedure P1-AT-LH-RO requires a maximum root gap spacing of 5/32". The inspector released the weld joint for processing and did not issue a nonconformance report.



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(1) CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED:

As the inspector noted in his report, the subject condition was identified during an in-process activity. Therefore, in accordance with program controls, Bechtel elected to write an In-Process Rework Notice in lieu of an NCR. Where inprocess work has not yet passed through final inspection by QC, Project Special Provisions Notice SF/PSP G-6.1, Revision 1, supplements FIM-G-3 and provides the alternate method for documenting nonconformances.

For the situation noted, immediately following the NRC inspection, In-Process Rework Notice 3892, was wirtten on 3-27-80, describing the oversized root gap condition on the 20" diameter, RHR System, weld repair, GBB-104-1-FW 16-R1 which was Field dispositioned to add weld filler material to bring the gap within the welding procedure required tolerances. The repaired fit-up was then visually inspected and found to be acceptable by the responsible Quality Control Engineer and the weld was completed and radiographed. This IPRN was included in the WR-5 welding and NDE package.

(2) CORRECTIVE STEPS WHICH HAVE BEEN TAKEN TO AVOID FURTHER ITEMS OF NONCOMPLIANCE:

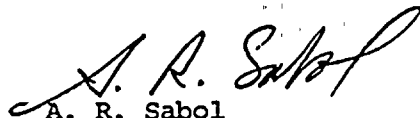
Two training sessions were held on 3/27 and 3/28/80 and documented with respect to the NRC finding. These sessions consisted of re-viewing the fit-up acceptance criteria with respect to codes, project specifications and procedures for controlling out-of-tolerance conditions. The first was held with the individual Quality Control engineer in question and the second was held with the entire welding Quality Control discipline to assure that this was not a common practice.

(3) THE DATE WHEN FULL COMPLIANCE WAS ACHIEVED:

Full compliance was achieved on 4-3-80.

- a) IPRN 3892 was closed on 3-28-80.
- b) FW 16-R2-GBB-104-1 was accepted by Quality Control on 4-3-80.

Very truly yours,



A. R. Sabol
Manager-Nuclear Quality Assurance

ARS:jmk

Mr. Robert T. Carlson

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July 3, 1980

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