



March 18, 1981
L-81-120

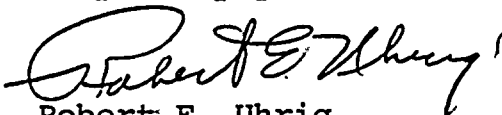
Mr. J. P. O'Reilly, Director, Region 11
Office of Inspection & Enforcement
U.S. Nuclear Regulatory Commission
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Re: R11:WPK
St. Lucie Unit 2
Docket No. 50-389/81-02

Florida Power & Light Company has reviewed the subject inspection report and our response is attached. There is no proprietary information contained in the report.

Very truly yours,


Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/TCG/nh.

cc: Harold E. Reis, Esquire

810.41.40 718

Violation: Inadequate Control of NDE

10 CFR 50, Appendix B, Criterion IX as implemented by FPL Topical Report (FPL TQARI-76A) Section 9 requires measures to be established to assure special processes including nondestructive are controlled. License procedure QI-9.1 establishes visual inspection requirements. EBASCO specification FLO-2998-G761 establishes ultrasonic examination requirements for structures.

Contrary to the above, measures were inadequate to control nondestructive testing in that:

1. On January 21, 1981 four safety injection system licensee accepted socket weld flange to pipe fillet weld joints had fillet weld leg size 1/16" smaller than the minimum permitted by Figure (b), Attachment 1 to QI-9.1.
2. On October 27-31, 1980, Weld Joint 2F-2STL-G838-275 was incorrectly accepted by ultrasonic examination.

Response: (Example 1)

1. FPL concurs with the finding.
2. The finding is attributed to inattention to job detail and drawings.
3. QC reinspected the SI welds identified in the audit report and generated NRC 1689M for Engineering evaluation.
4. All Category 1, 2 & 3 pipe to flange socket welds are in the process of being re-inspected and if found to be discrepant a WRR or an NCR will be initiated. Estimated completion is approximately three (3) months.
5. To preclude recurrence, the inspectors have and will continue, to receive training in fillet sizes and visual examination of weld in accordance with QI 9.1 and 9.2.
6. Full compliance will be achieved in approximately three (3) months.

Response: (Example 2)

1. FPL concurs with the finding.
2. Acceptability of the weld was evaluated based on AWS D.1.1 requirements and without complete history of initial joint fitup configuration.
3. Re-evaluation of the weld geometry required additional ultrasonic testing and weld repair was authorized by Weld Repair Report 2158.
4. QC will increase fitup surveillance. A fitup inspection will be performed in all cases where it appears that welds may not be readily accessible after completion. This information will be made available as required to evaluate similar conditions.

5. Full compliance has been achieved.

B. Violation: Failure to Properly Annotate Inspection Requirements

10 CFR 50, Appendix B, Criterion XVII, as implemented by FPL Topical Report (FPL TQARI-76A) Section 17, states. "Sufficient records shall be maintained to furnish evidence of activities affecting quality . . . Inspection records shall as a minimum identify . . . the type of observation . . ."

Contrary to the above, on January 21, 1981, inspection records did not identify the type of observation in that WRR-2107 was annotated for Root MT or PT inspection when Root After Backgouging MT or PT inspection was intended.

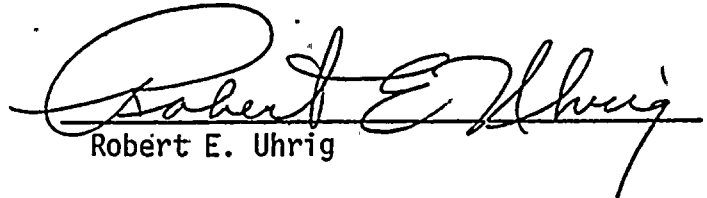
Response:

1. FPL concurs with the finding.
2. This finding resulted from incomplete information annotated on the weld requirement.
3. This item noted during this inspection was an isolated incident. Also, the Weld Repair Report was clarified at the time to indicate MT of the root after backgouging.
4. Inspectors have been informed to be more specific when assigning QC hold point inspections to Weld Repair Reports.
5. Full compliance was achieved prior to the exit interview.

STATE OF FLORIDA)
)
COUNTY OF DADE) SS.

Robert E. Uhrig, being first duly sworn, deposes and says:
That he is Vice President of Florida Power & Light Company, the Licensee herein;

That he has executed the foregoing document; that the statements made in this said document are true and correct to the best of his knowledge, information, and belief, and that he is authorized to execute the document on behalf of said Licensee.


Robert E. Uhrig

Subscribed and sworn to before me this
18 day of March, 19 81

Cheryl J. Fredrick
NOTARY PUBLIC, in and for the County of Dade,
State of Florida

My commission expires: Notary Public, State of Florida at Largo
My Commission Expires October 30, 1983
Bonded thru Maynard Bonding Agency