

JAN 2 1981

APPENDIX A

NOTICE OF VIOLATION

Florida Power and Light Company  
St. Lucie

License No. CPPR-144

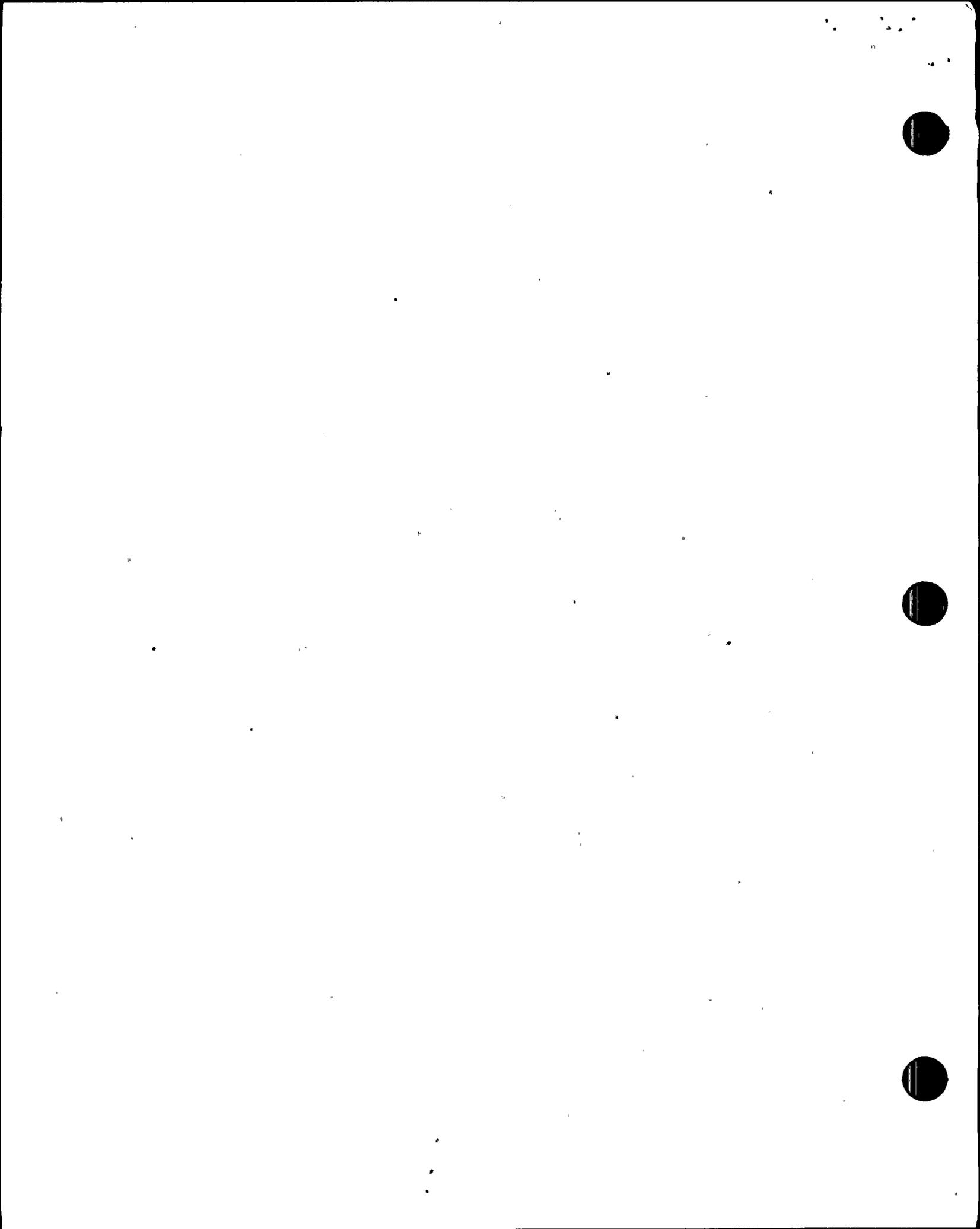
Based on the NRC inspection October 27-31, 1980, certain of your activities were apparently not conducted in full compliance with NRC requirements as indicated below. These items have been categorized as described in correspondence to you dated December 31, 1974.

- A. As required by 10 CFR 50, Appendix B, Criterion IX and as implemented by the Florida Power and Light Company Topical Report (FP&L TQAR1-76A) Section 9, "Measures shall be established to assure that special processes, including welding, heat treating and nondestructive testing are controlled and accomplished by qualified personnel using qualified procedures in accordance with applicable codes, standards, specifications, criteria, and other special requirements." SNT-TC-1A, paragraph 8.6.4 and procedure QI 2.7 requires the examinee to identify 90% of the known indications.

Contrary to the above, the following examples of noncompliance with applicable code or procedural requirements were noted in training and qualification test specimens for the certification of magnetic particle (MT), liquid penetrant (PT) and visual (VT) examiners.

1. MT test specimen #6 which is one of two currently used MT test plates used of certify examinees has chisel marks as defects which can be seen visually. In addition to not typifying weld defects which an examiner will encounter, the disposition sheet for the test specimen does not indicate how many indications are present, so establishing if the examinee has in fact identified 90% of the known indications is opinion in lieu of established fact.
2. Test specimen #10 which is used exclusively for testing PT examinee's does not typify actual PT evaluations encountered by a PT examiner. In addition, the disposition sheet for this test specimen also does not identify how many known indications are present to determine whether an examinee has in fact identified 90% of the known indication as required by the criteria above, most of which would be rejected visually and does not test the examinee's ability.

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3. (a) Test specimens for visual certification are not formally in the training program
- (b) Test specimens do not adequately test examinee's ability to use measuring devices or evaluate welds/fittings in accordance with the licensee's written Procedure QI 9.1 or Paragraph NB-5521 of Section III to the ASME Code.
- (c) Several defect/surface conditions are not included in hardware samples; i.e., burn thru, cracks, blow holes, 3-1 tapes and weld prep surfaces.

This is a deficiency.

- B. As required by 10 CFR 50, Appendix B, Criterion IX and as implemented by the Florida Power and Light Company Topical Report (FP&L QARI-76A) Section 9, "Measures shall be established to assure that special processes, including welding, heat treating and nondestructive testing are controlled and accomplished by qualified personnel using qualified procedures in accordance with applicable codes, standards, specifications, criteria, and other requirements." Licensee procedures QI 9.1., 9.4 and 9.5 establish the visual magnetic particles and liquid inspection requirements respectively.

Contrary to the above, on October 27-31, 1980, the following examples of noncompliance with applicable code or procedural requirements were noted in nondestructive testing and visual inspection.

1. A level I liquid penetrant (PT) examiner accepted nine linear indications on weld joint #2F-2-P-OE7003 that should have been rejected.
2. A level II PT examiner failed to mark/identify two linear indications on the base material within  $\frac{1}{2}$ " of weld joint #2F-2-P-OE6-003.
3. Two level I magnetic particle (MT) examiners were observed performing a MT examination on weld joint #2F-2-STL-G803-015 in which the application of the MT powder was extremely heavy, the removal of the particles were accomplished by vigorously blowing with the MT blow bulb at close range, and the color of the MT powder used for the inspection did not adequately contrast with the examination of the as-welded surface condition.
4. Weld joint #MS-0029-007 which had been visually accepted, was noted to have a sharp transition between the weld metal and the adjacent Tee fitting.

This is an infraction.

- C. As required by Paragraph (a)(1) of 10 CFR 50.55a, "...Systems... shall be... fabricated.... and inspected to quality standards commensurate with the importance of the safety function to be performed". For safety related piping weld radiography this requirement is implemented by Florida Power and Light Company Topical Report (FP&LTQAR1-76A) Appendix C, which requires nondestructive examination to be accomplished in accordance with Section V of the ASME B and PV Code.

Contrary to the above, the radiographic examination of safety-related piping welds was not performed in accordance with ASME Code Section V or licensee procedure in that:

1. Penetrameters and lead letter "F" were positioned on the weld, when it was possible to place same on adjacent base metal.
2. Radiographic films were not dated.
3. Location markers were not used to identify area of weld to be reviewed.
4. Base metal defects were not evaluated or dispositioned on the film reader's record.
5. The film reader's record contains erroneous information regarding radiographic technique and required radiographic sensitivity.

This is an infraction.

- D. As required by 10 CFR 50, Appendix B, Criterion VIII and implemented by the Florida Power and Light Company Topical Report (FP&L TQARI-76A) Section 8, "Measures shall be established to assure that material, parts, and components ... shall be identified and controlled as required throughout fabrication, storage, construction, etc."

Contrary to the above, the inspector noted that weld travelers at fitup inspection did not indicate where temporary attachments were installed, nor was the areas where the attachments were welded marked. A review of the licensee's visual inspection procedure did not have procedural requirements that will adequately control the use and inspection of temporary attachments.

This is an infraction.

- E. As required by 10 CFR 50, Appendix B, Criterion XVI and implemented by FP&L Topical Report (FP&L TQARI-76) Section 16, "Corrective Action" which states in part that measures shall be established to assure that conditions adverse to quality, such as ..., deficiencies, deviations, ... and nonconformances are promptly identified and corrected. ANSI 45.2.3-1973 establishes the requirements for housekeeping during the construction phase of nuclear power plants.

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Appendix A

Contrary to the above, during the week of October 27, 1980, it was found that construction debris and garbage which included highly inflammable liquids, were found in many areas of the containment, and auxiliary buildings where safety-related materials were being or had been installed.

This is an infraction.

