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October 13, 1981
L-81-448

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

Dear Mr. O'Reilly:

Re: RII:WPK
St. Lucie Unit 2
Docket No. 50-389/81-16

Florida Power & Light Company has reviewed the subject Inspection Report and our response is attached. There is no proprietary information contained in the report. A one-day delay in submittal of this response was necessary to verify a drawing number listed in the Inspection Report. This was discussed with Mr. W. P. Kleinsorge of your office.

Very truly yours,

Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/TCG/ah

Attachments

cc: Harold F. Reis, Esquire

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Q PDR

Violation: Inadequate Measures to Control Welding

10 CFR 50, Appendix B, Criterion IX as implemented by Section 9 of FPL Topical Report (FPL-TQAR1-76A), requires measures be established to assure Procedure SQP-8, Revision 3, "Storage and Distribution of Welding Filler Material", requires all unused welding filler material to be returned to the Weld Rod Control Room. SQP-8 further requires "Weld Material Requisition Reports" to be properly annotated and approved. SQP-8 and FPL ASME Quality Assurance Manual, AQR 9.2 PSL-2, Revision 3, "Storage and Distribution of Welding Material" requires heated portable rod ovens to be used for covered electrodes. FPL Site Quality Procedure SQP-39, Revision 3, "Field Welding Control", requires preheat temperature to be controlled. Welding Procedure Specification 15, Revision 0, requires bead width for 1/8-inch diameter Type E-7018 electrodes not to exceed 3/4-inch maximum. Welding Procedure Specification 50, Revision 4, requires bead width for 1/8-inch diameter Type E-308-16 electrodes not to exceed 5/8-inch maximum.

Contrary to the above, on August 18-20, 1981, measures were inadequate to control welding in that:

1. Twenty-two unused 3/32-inch diameter Type E-7108 electrodes were abandoned in the auxiliary building.
2. The welders of record for CC-2079-0038 and STL-G-799-110 did not have a properly annotated and approved "Weld Material Requisition Report".
3. Four portable rod ovens, containing cold Type E-7018 electrodes were unplugged inoperative or abandoned.
4. The welders of records for weld joint No. STL-G-799-049 did not know the preheat requirements for that weld joint or have the means to measure the specified preheat temperature.
5. The single bead cover pass on weld joint No. STL-G-799-110 deposited 1/8-inch electrode using Welding Procedure Specification 15, Revision 0, was one-inch wide.
6. The single bead cover pass on safety injection weld repair No. SI-0103-902 deposited 1/8-inch diameter Type E-308-16 electrode, using Welding Procedure Specification 50, Revision 4, was 7/8-inch wide.
7. The heat numbers for one of the base materials being joined by safety injection system weld SI-0110-011 was

incorrectly annotated on the weld traveler for that joint.

Response 1 (Example 1)

1. FPL concurs with the finding.
2. The reason for this violation was human error.
3. Signs have been posted at each of the depositories located in each of the buildings for the collection of all unused E-7108 electrodes stating that all electrodes must be bent before depositing.
4. All personnel, both supervision and craftsmen, were instructed to comply with this requirement of SQP-8.
5. Full compliance has been achieved.

Response: (Example 2)

1. FPL concurs with the finding.
2. The reason for this violation was human error.
3. The weld material requisition has been amended to insure proper annotation and approval signatures.
4. All personnel, supervision, general foremen, foremen and craftsmen, have been duly instructed in this requirement of SQP-8.
5. Full compliance has been achieved.

Response: (Example 3)

1. FPL concurs with the finding.
2. The reason for this violation was human error.
3. All portable ovens are inspected daily on a preventive maintenance basis. They are monitored constantly throughout the working shifts by supervision.
4. All personnel, supervision and craftsmen, have been alerted to the seriousness of this violation to preclude the possibility of a recurrence of this condition.

5. Full compliance has been achieved.

Response: (Example 4)

1. FPL concurs with the finding.
2. The welder did not know the preheat requirements for joint #ST-G-799-049, nor had he been properly instructed by his foreman to use the temp-stick before and during the welding process.
3. On August 24, a training class was held with the welder and his supervision instructing them on the minimum requirements for preheated welds.
4. The two General Foremen in the RCB area were requested to instruct all welders in their area on the necessity of monitoring all preheated welds before and during the welding process.
5. Full compliance has been achieved as of August 26, 1981.

Response: (Example 5 and 6)

1. These examples were investigated on August 24, 1981 and we did find that the welders had violated the WPS-50 and WPS-15 procedures by exceeding the maximum oscillation requirement.
2. After a verbal discussion with the welders, it was evident that they did not fully understand this weld requirement.
3. On August 24, a training class was held with the welders and supervision on WPS-50 and WPS-15.
4. The General Foremen books containing all WPS weld procedures have been made available to any welder who needs to review a weld procedure.
5. Full compliance was achieved on August 26, 1981.

Response: (Example 7)

1. FPL concurs with the finding.
2. The inspector was confused by the way B. F. Shaw applied the heat number and nameplate in the same proximity on the subject spool.

3. The subject spool was part of a B. F. Shaw prefabricated assembly. The heat number applied to the Weld Traveler was the one stamped into the pipe next to the ASME nameplate since there was no number on the elbow. Re-inspection by the QC Supervisor and a QC Supervisor Field resulted in the correction of the heat number applied to the Weld Traveler. This correction now shows the spool number which includes the elbow in question.
4. The inspector was reinstructed in the documentation requirements of large bore piping on this site. Additional instruction will be given to other piping and welding inspectors to insure compliance with this site procedure.
5. Full compliance is expected to be completed prior to October 14, 1981.

STATE OF FLORIDA)
)
COUNTY OF DADE .) ss.

 J. E. Vessely , being first duly sworn, deposes and says:

That he is Director, Nuclear Affairs of Florida Power &
Light Company, the herein;

That he has executed the foregoing document; that the state-
ments 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

J. E. Vessely
J. E. Vessely

Subscribed and sworn to before me this

 13 day of October , 19 81

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

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

