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UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III

799 ROOSEVELT ROAD
GLEN PLAZA, ILLINOIS 60137

AUG 19 1975

Commonwealth Edison Company
ATTN: Mr. Byron Lee, Jr.
Vice President
P. O. Box 767
Chicago, Illinois 60690

Docket No. 50-249

Gentlemen:

This refers to the inspection conducted by Messrs. C. M. Erb and E. Lee of this office on May 19, June 18 and 20 and July 20, 1975 of activities at Dresden Nuclear Power Station Unit 3 authorized by NRC Operating License No. DPR-25 and to the discussion of our findings with Mr. A. Roberts and others of your staff at the conclusion of the inspection.

A copy of our report of this inspection is enclosed and identifies the areas examined during the inspection. Within these areas, the inspection consisted of a selective examination of procedures and representative records, interviews with plant personnel, and observations by the inspectors.

During this inspection, it was found that certain of your activities appear to be in noncompliance with NRC requirements. The item and reference to the pertinent requirements are listed under Enforcement Action in the Summary of Findings Section of the enclosed inspection report. Prior to the conclusion of the inspection, the inspectors determined that corrective action had been taken with respect to this item of noncompliance and that measures have been taken to assure that a similar, future noncompliance will be avoided. Consequently, no reply to this letter is required, and we have no further questions regarding this matter at this time.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosed inspection report will be placed in the NRC's Public Document Room. If this report contains any information that you or your contractors believe to be proprietary, it is necessary that you make a written application to this office, within twenty days of your receipt of this letter, to withhold such information from public disclosure. Any such application must include a full statement of the reasons for which it is

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claimed that the information is proprietary, and should be prepared so the proprietary information identified in the application is contained in a separate part of the document. Unless we receive an application to withhold information or are otherwise contacted within the specified time period, the written material identified in this paragraph will be placed in the Public Document Room.

No reply to this letter is necessary; however, should you have any questions concerning this inspection, we will be glad to discuss them with you.

Sincerely yours,

Gaston Fiorelli, Chief
Reactor Operations Branch

Enclosure:
IE Inspection Rpt No.
050-249/75-17

bcc w/encl:
PDR
Local PDR
NSIC
TIC
Anthony Roisman, Esq.

U. S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION III

Report of Construction Inspection

IE Inspection Report No. 050-249/75-17

Licensee: Commonwealth Edison Company
P. O. Box 767
Chicago, Illinois 60690

Dresden Nuclear Power Station Unit 3
Morris, Illinois

License No. DPR-25
Category: C

Type of Licensee: GE, BWR 807 MWe

Type of Inspection: Announced - In-Service

Dates of Inspection: May 19, June 18, 20 and July 20, 1975

Principal Inspector: C. M. Erb

8/11/75
(Date)

Accompanying Inspector: E. Lee
(May 19, 1975 only)

8/14/75
(Date)

Other Accompanying Personnel: None

Reviewed By: *D. W. Hayes*
D. W. Hayes
Senior Inspector
Construction and Engineering
Support Branch

8/14/75
(Date)

SUMMARY OF FINDINGS

Inspection Summary

Inspection on May 19 and 22, 1975: Review of welding procedures and NDE records of Phillips Getschow (P-G), contractor to install the two four-inch replacement recirculation bypass loops. Inspection of hardware. One item of noncompliance was identified: failure to secure an approval signature from the authorized inspector prior to use of an ultrasonic procedure.

Inspection on June 18 and 20: Review of radiographic results for four-inch line from Superior Industrial X-Ray Company. Review of welder qualifications and NDE personnel qualifications.

Inspection on July 20, 1975: Review of in-service procedures and calibration information. Witnessed ultrasonic testing of four-inch bypass piping. Reviewed qualifications of NDE personnel used by Nuclear Services Corporation (NSC).

Enforcement Items

The following item of noncompliance was found during the inspection:

Deficiency

Contrary to 10 CFR Part 50, Appendix B, Criterion VI, one ultrasonic procedure was not approved by the authorized inspector prior to commencing the in-service inspection. (Report Details, Section II, Paragraph 3)

Licensee Action on Previously Identified Enforcement Items

Not applicable.

Other Significant Items

A. Systems and Components

Not applicable.

B. Facility Item

Unresolved Item - ASME Code, Section XI, requires that records of in-service inspections should indicate specifically when and what NDE inspections were made and should indicate what items must still be inspected for the ten-year in-service requirements.

C. Managerial Items

Not applicable.

D. Noncompliance Identified and Corrected by Licensee

None.

E. Deviations

None.

F. Status of Previously Reported Unresolved Items

Not applicable.

Management Interview

A. The following persons attended management interviews during the course of the inspections.

Commonwealth Edison Company (CE)

B. Stephenson, Station Superintendent

A. Roberts, Assistant Station Superintendent

L. D. Burchfield, Administrative Assistant

B. Matters discussed and comments by management were as follows:

The inspector stated that he had examined UT Procedure No. NDT-C-15, Revision 0, and noted that it had not been properly signed by the authorized inspector prior to the commencement of the inspection. However, this procedure was signed by the authorized inspector on May 21, 1975. The inspector requested that the licensee be certain that all NDE procedures or revisions to procedures be signed by the authorized inspector prior to use. This matter is closed. (Report Details, Section II, Paragraph 3)

The inspector noted that an overall record of the status of the various categories of in-service inspection was not available for the ten-year period. The licensee stated that the records would be pulled together, and identified welds already inspected and welds to be inspected would be shown so that the percentage of in-service performed at the various time intervals can be checked against the requirements of ASME Section XI and the technical specifications.

REPORT DETAILS

Part I

Prepared By C. M. Erb

Persons Contacted

The following individuals, in addition to those involved in the management interview, were contacted during this inspection.

Commonwealth Edison Company (CE)

B. Mahji, Nondestructive Test - OAB
R. Mirochna, Coordinator - In-Service Inspection
M. Wright, Quality Control Inspector
J. Martin, Coordinator - In-Service Inspection
R. Meadows, Engineering Assistant

Phillips Getschow (P-G)

M. J. Kelly, Supervisor - Quality Control
A. T. Marconi, Welding Engineer

Nuclear Services Company (NSC)

V. Lovelace, Supervisor - NDE Testing, Level III
D. MacGill, Supervisor - NDE Testing, Level III
D. Arremony, Ultrasonic Inspection - Level II

Results of Inspection

1. Quality Documentation for Four-inch Diameter, 0.337 Wall Recirculation Bypass Loops, Fabricated by P-G

The inspector examined the following documents in connection with these piping loops, which were replaced except for the existing weldolet and valve in each loop.

Weld Procedure	1A-MA-88-0, Revision 2
Base Metal Specification	SA-312, Type 304L
Insert, Weld	Type 308L
Uncoated Electrode	SFA5.9 F-7
Coated Electrode	SFA5.4 F-5
Qualification Test, Weld Procedure	by Taussig Associates
Certificate Authorization for P-G	No. 627, NPT

These documents conformed to ASME Section III, 1971 Edition,
Summer Addenda, and ASME Section IX, 1971.

2. Radiography of Shop and Field Welds

The inspector examined the radiographic film submitted to P-G and the licensee by Superior Industrial X-Ray Company. Film for the following welds was examined, and the quality of the welds was acceptable to ASME B31.1.0, 1967.

<u>Weld No.</u>	<u>Fabrication</u>
W-1B	Field
W-4A	Field
W-4B	Field
W-4B-C1	Field
W-2A	Shop
W-3A	Shop
W-2B	Shop
W-1A R2	Field

3. Qualifications of Welders and NDE Personnel

The inspector examined the qualifications of the following personnel:

Superior Industrial X-Ray Company

T. J. Green, Level 2 - Radiography and Penetrant Test
K. R. Mavity, Level 2 - Radiography and Penetrant Test
C. J. Andersen, Level 3 - Radiography, Magnetic and Penetrant Tests
R. W. Gardner, Level 3 - Radiography; Level 2 - Magnetic and Penetrant Tests

All welders used on this job were properly qualified to Section IX and had been issued identification letters.

4. In-service Inspection

The in-service inspection was performed by NSC. Test reports were signed by an NSC representative, a CE Level 2 inspector, and the Hartford Steam Boiler Insurance inspector.

Calibration blocks for the various categories of welds to be ultrasonically tested were furnished by the licensee to NSC.

The inspector witnessed the UT calibration and testing in the containment of the replacement four-inch bypass recirculation pipe welds. Since these welds were all new welds, this UT testing constituted the base-line inspection. The in-service requirements are shown in ASME Section XI, 1971, Summer Addendum. The UT equipment requirements are outlined in ASTM E164-65.

Welds from all the categories, as shown in Section XI, were tested.

5. Qualifications of Personnel

The qualified procedures for testing are shown in Section II of this report.

The qualifications of NSC personnel for ultrasonic testing are tabulated below:

V. Lovelace	Level 3
D. MacGill	Level 3
J. Gower	Level 2
A. Peck	Level 1
J. Henry	Level 1
W. Ford	Level 2 Consultant
J. Albanese	Level 2
D. Arremony	Level 2
F. Griffin	Level 1
J. Henry	Level 1
L. Thomas	Level 2

The inspector noted a letter from the Travelers Insurance Company stating he had witnessed UT calibration and in-service testing of three welds in the steam line and two welds in the feedwater line.

He also witnessed visual, penetrant, and ultrasonic tests on an HPCI line, safe end-to-nozzle weld, and isolation condenser line.

The base-line and in-service testing, to date, appears to meet the requirements of Section XI.

REPORT DETAILS

Section II

Prepared By E. W. K. Lee

Persons Contacted

The following individuals, in addition to those involved in the management interviews, were contacted during this inspection.

J. Martin, Coordinator - In-service Inspection (CE)

Results of Inspection

1. Nondestructive Examination (NDE) Personnel Qualification

The inspector reviewed qualification records of seven (7) NDE personnel who performed work during this in-service inspection. Their qualifications included Level I, II, or III on UT, RT, PT, MT, or ET and were determined to be acceptable.

2. Commonwealth Edison Company (CE) In-service Inspection Plan and NDE Procedures

The inspector reviewed the following documents, and they appeared to be acceptable:

- a. CE Procedure No. 38-000-11, Revision 0, dated April 1975, "In-service Inspection Plan."
- b. CE NDE Procedure No. NDT-C-1, Revision 4, dated December 21, 1974, "Ultrasonic Inspection of Pressure Retaining Bolting from Two Inches to and Including Four Inches in Diameter."
- c. CE NDE Procedure No. NDT-C-2, Revision 9, dated December 21, 1974, "Ultrasonic Inspection of Pipe Welds."
- d. CE NDE Procedure No. NDT-C-4, Revision 4, dated December 21, 1974, "Ultrasonic Inspection of External Support Attachment Weld Areas on Piping."
- e. CE NDE Procedure No. NDT-C-5, Revision 5, dated December 21, 1974, "Ultrasonic Inspection of Reactor Vessel Welds."
- f. CE NDE Procedure No. NDT-C-10, Revision 5, dated December 21, 1974, "Ultrasonic Inspection of Inner Radius of Nozzle-to-Vessel Junction."

- g. CE NDE Procedure No. NDT-C-11, Revision 6, dated January 23, 1975, "Ultrasonic Inspection Flange Ligaments Between Threaded Bolt Holes."
- h. CE NDE Procedure No. NDT-C-12, Revision 3, dated December 21, 1974, "Ultrasonic Inspection of Reactor Vessel Head Welds."
- i. CE NDE Procedure No. NDT-C-14, Revision 3, dated January 3, 1975, "Ultrasonic Inspection of Pressure Retaining Bolting Over Four Inches in Diameter."

3. Procedure Without Proper Approval

CE Procedure No. 38-000-11, Revision 0, dated April 1975, "In-service Inspection Plan," paragraph C.l.f., states, in part, that" procedures must be signed and approved by Commonwealth Edison Company's Level III, Quality Assurance, Authorized State Inspector and the station. These approvals must be completed prior to the commencement of the inspection. "

Contrary to the above, CE Procedure No. NDT-C-15, Revision 0, dated January 29, 1975, "Ultrasonic Inspection of Safe End-to-Nozzle Welds and Safe Ends," has not been signed and approved by the Authorized State Inspector prior to the commencement of the inspection. During a subsequent inspection, the above procedure was signed and approved by the Authorized State Inspector on May 21, 1975. This indicates corrective action had been taken with respect to this item of non-compliance. Consequently, no further action on this item is required.