

POSSIBLE REPORTABLE DEFICIENCY 50.55(e)
ARIZONA PUBLIC SERVICE COMPANY (APS)
PALO VERDE NUCLEAR GENERATING STATION (PVNGS)
UNITS #1 AND #2
INTERIM REPORT - APRIL 9, 1980

I. Purpose

The purpose of this report is to provide information required by 10CFR50.55(e) relating to the inappropriate inspection of ASME Section III, Class 3 piping system welds.

II. Background

The original welding and nondestructive testing requirements for field erected piping was developed by Bechtel Engineering, based on the ASME Section III Code, 1974 Addition, which was the Code in effect for the project at that time. These welding, testing and inspection requirements were described, in Matrix form, on Drawing No. 13-P-ZZG-001, commonly referred to as "Form 84". This Drawing was revised on January 4, 1977 to update the requirements to the Construction Permit ASME Code, effective date of Winter 1975. This Drawing, No. 13-P-ZZG-001 (Form 84), Revision 1, was reviewed and approved in accordance with the Project Quality Assurance Program, by Bechtel's Materials and Quality Services, by the Authorized Nuclear Inspector and by APS personnel.

In spite of this review, APS was informed by Bechtel that Deficiency Evaluation Report No. 80-5, dated March 27, 1980, was issued to document the fact that Drawing No. 13-P-ZZG-011, Revision 1, was not in conformance with the Winter 1975 ASME Code Addenda.

Specifically, the Winter 1975 Addenda changed the wording of Paragraph ND-5222 to require that circumferential weld joints larger than 2" to be examined by either magnetic particle, liquid penetrant or radiographic methods. Contrary to this requirement, Drawing No. 13-P-ZZG-001 (Form 84) listed all ASME Section III, Class 3 welds between 2" and 4" to be visually inspected as was required by the 1974 Addition of the ASME Code.

III. Description of the Deficiency

This deficiency only affects field welds in piping system sizes 2" to 4" as Form 84 is only used for construction. As a result of this oversight, 161 ASME Section III, Class 3 welds in Unit #1 and 32 welds in Unit #2 were visually inspected, rather than examined by the liquid penetrant (LP) method as the Code requires.

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IV. Analysis of Safety Implications

The safety implications of this deficiency cannot be fully evaluated until the results of our reinspection of these 193 welds are available. These results will then be evaluated as to the defect's potential effect on the safety performance of the piping system involved. As of April 8, 1980, some 25 welds have been liquid pentrant inspected and no defects have been found.

V. Preliminary Corrective Action

Nonconformance W-X-278 has been written to document the deficient welds and will be dispositioned upon completion of the liquid pentrant examination. In addition, a Corrective Action Request (CAR) No. S-80-7 was initiated and dispositioned to initiate corrective action to preclude recurrence of similar deficiencies.

All of the 193 welds will be liquid penetrant inspected and Form 84 will be revised to reflect the requirements of the Winter 1975 Addenda.

The corrective action described will assure that the improperly inspected welds, as well as all future welds, will be inspected in accordance with the applicable ASME Code requirements.



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