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USNRC REGION II
ATLANTA, GEORGIA

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FLORIDA POWER & LIGHT COMPANY

January 11, 1982
L-82-10

Mr. James P. O'Reilly
Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Re: Turkey Point Units 3 & 4
Docket Nos. 50-250, 50-251
IE Inspection Report 81-26

Florida Power & Light Company has reviewed the subject inspection report and a response is attached.

There is no proprietary information in the report.

Very truly yours,

Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/PLP/ras

cc: Harold F. Reis, Esquire

ATTACHMENT

RE: TURKEY POINT UNITS 3 & 4
DOCKET NO. 50-250, 50-251
IE INSPECTION REPORT 81-26

FINDING A:

10 CFR 50, Appendix B, Criterion IX, as implemented by paragraph 9.1 of the accepted Quality Assurance Program, requires measures be established to assure that special processes including welding are controlled and accomplished in accordance with procedures. CB&I procedure RT1, revision 4, "Radiographic Examination Procedure", paragraph 5.5.1, requires the lead letter "B" to be placed on the back of the film holders during radiography. CB&I Nuclear Quality Manual for ASME Section III Products, Revision 4, Construction, Section 8 Welding, paragraph 8.2.2.1, requires all welding materials to be stored in locked storage areas or locked electrode ovens. BPC Welding Standard WFMC-1, dated April 15, 1981, paragraph 4.5.6, requires portable rod warmers to be continuously heated or energized during use except during transit time. BPC Welding Standard WFMC-1, paragraph 4.5.6, further requires low hydrogen low alloy electrodes to be used directly from portable rod warmers.

Contrary to the above, on November 4-5, 1981, adequate measures had not been established to assure that special processes were controlled in that:

1. The Lead Letter "B" was not attached to the back of the film holders during radiography of welder qualification test assemblies.

2. Type E8018 welding electrodes were stored in an unguarded unlocked electrode oven.

3. Cold flux covered welding electrodes were left for approximately eight hours in an unenergized portable rod warmer.

4. Type E7018 low hydrogen, low alloy electrodes were used from an open bucket adjacent to an energized rod warmer.

RESPONSE:

Item 1.

1. FPL concurs with the finding.

2. The lead lined box was being used for x-ray shots of welder qualification samples and it had been proven to be efficient in eliminating backscatter. The box is completely lead lined especially for this use.

3. No corrective action was taken. Several test "shots" were performed for review by the NRC representative, which had been loaded with lead letter "B". No backscatter was detected.

4. All code x-rays of welded seams and welder qualification x-rays, are "shot" with the lead letter "B" attached to the backside of the cassette. FP&L Q.A. has witnessed several of these shots to verify this.

5. The program was in full compliance on 12/4/81.

Item 2

1. FPL concurs with the finding.

2. Personnel had removed the lock on the storage oven in order to put it on a storage oven in the containment building. The attendant was in the process of obtaining a replacement lock from the QA office when the observation was made.

3. Personnel were informed to pay more attention to lost locks. No further instances of such lack of control have occurred.

4. Additional locks were purchased and stored inside the containment for use if a lock gets misplaced or damaged.

5. The program was in complete compliance by the afternoon of 11/5/81.

Item 3

1. FPL concurs with the finding.

2. The reason for the violation is that when the welder arrived at his work station, he neglected to plug his rod warmer in. He was called out of the containment to do other work and did not return, leaving the rod can unplugged the entire shift.

3. The responsible superintendent and welder were reinstructed on weld rod control requirements.

4. All welders are reminded to plug their warmers in. When the situation warrants further action, the welder's qualification will be rescinded and he will be terminated from the job.

5. We consider that the program is in full compliance, and that this was an isolated incident.

Item 4

1. We agree that Type E-7018 electrodes were found as described, however, we do not agree that it is a violation. The electrode under consideration is Type E-7018. This electrode is a low hydrogen rod, but it is not a low alloy rod; therefore, this requirement does not apply because low hydrogen rods are not required to be issued in a rod warmer, as are low hydrogen, low alloy rods.

   Secondly, Bechtel Specification WFMC-1, Rev. 0, Table 1, required low hydrogen Type E-7018 electrodes to be issued in a container in accordance with Note 1 of Table 1. The maximum time out of the holding oven is 12 hours.

   We issue all covered rods in a portable rod warmer even though this is not a specification requirement. It is an acceptable practice for a welder to transfer a portion of his rod to a container, other than a rod warmer, and use the rod from that container during welding. Since our working shifts are less than 12 hours each and the welder returns his rod and rod can at the end of his shift, it is not likely that the rod would be out of an oven for greater than the specification limit of 12 hours.

2. Response is not required since we do not agree that Part 1 of the finding is a violation.

3. No action is considered necessary for correction.

4. No corrective action is considered necessary to prevent recurrence.

5. The program is considered to be in full compliance.

FINDING B

10 CFR 50, Appendix B, Criterion XIII, as implemented by paragraph 13.1 of the accepted Quality Assurance Program, requires measures be established to control the handling, storage and preservation of materials and equipment in accordance with work and inspection procedures to prevent damage or deterioration.

Contrary to the above, on November 3-6, 1981, measures were not established to control the storage and preservation of materials and equipment in that the following were noted:

1. Approximately five examples of rigging from or scaffolding supported by installed safety related cable trays or piping.

2. The licensee has no documented procedures to control rigging from or scaffolding on safety related materials or equipment.

3. Numerous examples of extraneous markings and various types of tape applied to the surfaces of safety related components, tanks and piping.

4. The licensee has no documented procedure to control surface applied substances for safety related stainless steel applications to prevent deterioration.

RESPONSE:

Items 1 and 2

1. FPL concurs with the finding.

2. At the time of the NRC visit, scaffolding was being installed without contacting the contractors Field Engineering group. There was no set policy or procedure for review of existing systems used to rig from or scaffold off of installed components to insure they were adequate to support the additional load.

3. A walkdown of scaffolding and rigging was performed by the Field Engineering group to insure equipment, piping and cable trays were not overloaded. Field Engineering has judged that no equipment, piping or cable trays were overloaded.

4. Supervision was instructed to review any scaffolding attachments to existing equipment, piping and cable trays with Field Engineering prior to rigging and scaffolding. Periodic walkdowns will be done by Field Engineering to insure that any scaffolding attachments to existing equipment, piping and cable trays does not overload the equipment, piping and cable tray

5. With the implementation of Item 4 above, the program is now in full compliance.

Items 3 and 4

1. FPL concurs with the finding

2. Uncontrolled tape and marking pen ink used during construction/maintenance were not properly removed after use.

3. Construction supervision will be instructed at the end of each outage to remove all such tape/marking pen ink from stainless steel surfaces as per Engineering direction.

4. A site procedure ASP-15, "Control of Expendable Products", was in the review stage during the NRC visit. As of the date of this letter, it is in the final signature cycle.

5. The program will be in full compliance as of February 12, 1982. Existing tape/ink will be removed as per Engineering direction before the start up of Unit 3.

FINDING C:

Paragraph (a)(1) of 10 CFR 50.55a requires structures and components be fabricated and inspected to quality standards commensurate with the importance of the safety function. ASME B and PV Code Section IX has been identified as the applicable code for welding procedure specifications. Paragraph QW.201.1 of ASME Section IX requires that welding procedure specifications list specific facts involved in qualifying a procedure specification.

Contrary to the above, on November 4, 1981, structures and components were not fabricated to quality standards commensurate with the importance of the safety functions in that the code required specific facts (non-essential variables), QW-410.5 method of initial interpass cleaning; QW-410.10 single electrode or multiple electrode; QW-410.15 electrode spacing; QW-410.25 manual, semi-automatic or machine-atomatic welding; and QW-410.26 peening; were not addressed in welding procedure specifications.

RESPONSE

1. FPL does not agree with the finding: the non-essential variables delinated in the finding are either incorporated by reference in the procedures reviewed by NRC or not applicable as explained below.

   1. ASME Section IX, paragraph QW-410.5-a change in the method of initial and interpass cleaning (brushing, grinding, etc.) affected Welding Procedure Specifications - P1-AT-Lh(CVN), P3(G3) P1-AT-Lh(CVN) and P1-A-LH.

Response

The welding procedure specifications contain the statement, "This welding procedure specification must be used in conjunction with the General Welding Standard GWS-FM". By means of this statement, the referenced general welding standard becomes a part of the welding procedure specification. This results in many non-essential variables being found in the general welding standards. GWS-FM, Revision 4, paragraph 4.1.3 requires that filing, brushing or grinding be performed prior to fit-up (initial cleaning) and welding (in-process cleaning); additionally this paragraph is supplemented by paragraph 4.4.8 of GWS-FM, which states, "Each completed weld head shall be cleaned essentailly free of slag, heavy oxide, glassy silicate deposits, or other foreign material before depositing successive beads.

Conclusion

The non-essential variable listed in ASME Section IX, paragraph QW-410.5 is addressed in General Welding Standard GWS-FM.

2. ASME Section IX, paragraph QW-410.10 - A change from single electrode to multiple electrode, or vice versa, for machine or automatic welding only.

ASME Section IX, paragraph QW-410.15 - A change in the electrode spacing for machine or automatic welding only. Affected Welding Procedures Specifications - P1-AT-Lh(CVN) and P3(G3) P1-AT-Lh(CVN).

Response

The inspection report quotes the paragraph from ASME Section IX out of content. Paragraphs QW-410.10 and QW-410.15 do not apply to the manual welding process, only to machine or automatic welding; therefore, the variables are not applicable to these welding procedures.

3. ASME Section IX, paragraph QW-410.25 - A change from manual to semi-automatic to machine automatic welding and vice versa.

   Affected Welding Procedure Specifications - P1-AT-Lh(CVN), P3 (G3) P1-AT-Lh(CVN) P43A and P1-A-Lh.

Response

The four referenced welding procedure specifications concern the use of the manual shielded metal arc process and the manual gas tungsten arc process. This is evident from the date on the WPS's. The inspection report therefore, quoted the referenced paragraph from ASME Section IX out of context, since semi-automatic or machine automatic welding are not applicable.

4. ASME Section IX, paragraph QW-410.25 addition or deletion of peening.

   Affected Welding Procedures Specifications -P1-AT-Lh(CVN), P3 (G3) P1-AT-Lh(CVN), P-43A and P1-A-Lh.

Response

The use of peening is not used on Bechtal projects. In the event that peening was needed, then the applicable welding procedure specification or general welding standard would be revised to permit peening. If peening had been used to qualify the welding procedures, it would have been included in the procedure qualification records and the welding procedure specification.

Based on the above, we consider that there are no deficiencies in the referenced welding procedure specifications with respect to inclusion of non-essential variables. These welding procedure specifications in combination with the applicable general welding standards are in full compliance with ASME Section IX requirements.

STATE OF FLORIDA)
) ss.
COUNTY OF DADE)

Robert E. Uhrig, being first duly sworn, deposes and says:

That he is Vice President of Florida Power & Light Company, the 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

Robert E. Uhrig

Subscribed and sworn to before me this

11 day of January, 1981

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