



USNRC REGION II
ATLANTA, GEORGIA

Carolina Power & Light Company

30 SEP 26 A 9:17

Raleigh, NC 27602

September 19, 1980

Mr. James P. O'Reilly
United States Regulatory Commission
Region II
101 Marietta Street, Northwest
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

In reference to your letter of August 26, 1980, referring to RII NE 50-400/80-18, 50-401/80-16, 50-402/80-16, 50-403/80-16, the attached is Carolina Power and Light Company's reply to the deficiencies identified in Appendix A. It is considered that the corrective and preventive actions taken are satisfactory for resolution of these items.

Thank you for your consideration in this matter.

Yours very truly,

P. W. Howe
Vice President
Technical Services

NJC:jp

Attachment

cc: Mr. J. A. Jones

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INFRACTION

Condition Reported:

A. As required by Criterion V of Appendix B to 10 CFR 50, and implemented by Carolina Power and Light PSAR Section 1.8.5.5, "Activities affecting quality shall be prescribed by documented instructions, procedures or drawings,...and shall be accomplished in accordance with these instructions, procedures or drawings."

1. Paragraph 9.1 of CP&L Procedure CQA-2, Rev. 2 states in part thatprocedures or portions thereof that have been superseded or voided will be recalled or destroyed.

Contrary to the above, on July 9, 1980, Revision 2 of Weld Procedure Specification WPS-8BU7, voided by Revision 3 issued on June 18, 1980 was still being used by craft in the field.

2. Appendix A of CP&L Procedure AP-VII-06, Revision 2 states in part that "...excess materials (trash) shall not be allowed to accumulate and create condition which may adversely affect quality.

Contrary to the above, on July 7 and 8, 1980 construction debris and trash in excessive amounts were observed inside the fuel handling building, containment and other areas where work was in progress.

3. Paragraph 3.7 of WP-113 states in part that component ends shall be appropriately plugged or sealed....when the ends are not being worked upon.

Contrary to the above on July 8-9, 1980 throughout the construction site, except the storage yard, stainless steel fabricated spools and pipe material were observed without protective caps, resting in water, on the ground and in one instance partially covered with cement.

B. As required by Criterion XVII of Appendix B to 10 CFR 50, and implemented by Carolina Power and Light PSAR Section 1.8.5.17, "Sufficient records shall be maintained to furnish documented evidence of activities affecting their quality." Paragraph QW-351 of ASME Section IX requires that the limits of thickness for which a welder is qualified are dependent upon the thickness of the weld deposited with each welding process.

Contrary to the above, on July 10, 1980 welder performance qualification records involving combination processes did not indicate the weld metal thickness deposited with each welding process.

C. As required by Criterion VIII of Appendix B to 10 CFR 50, and implemented by Carolina Power and Light PSAR Section 1.8.5.8 "Identification and control measures shall be designated to prevent the use of incorrect....material..."

Contrary to the above on July 9, 1980 low carbon stainless steel 308-L electrodes produced from heat numbers 602571 and 65325H4BD were being issued to the field as regular analysis 308 stainless steel electrodes.

Corrective Steps Taken and Results Achieved:

- A. 1. Weld Procedure Specification WPS-8BU7, revision 3, was issued by Document Control on June 18, 1980, to the Welding Engineering Unit and was subsequently issued to the craft in the field on July 10, 1980. The superceded revision was destroyed. However, revision 3 to WPS-8BU7 did not affect quality since the change was to a non-essential variable allowing the use of a larger gas cup size.
2. Discrepant housekeeping items have been corrected.
3. The site area has been inspected for discrepancies as listed and corrections have been made.
- B. 1. A W.P.S. (Weld Procedure Specification) consisting of two welding processes are controlling thickness by specifying one (1) to three (3) passes for the root pass by Gas Tungsten Arc Welding process and the balance to be completed by the Shielded Metal Arc Welding process. This ensures that the welding procedure and welders were properly qualified and employed in the weld joint. The actual thickness of the weld deposited by each process, was not shown but was controlled by the number of passes. Welder performance qualification records involving combination processes have been revised to show the actual weld metal thickness deposited by each process. All new welder performance qualifications will show the actual weld metal thickness deposited by each process.
2. When a combination W.P.S. is specified for welding a joint, both welding processes shall be used and welder will be qualified for both processes within the thickness limitations.
3. A review of safety related items welded revealed that when a combination W.P.S. was specified, both processes were used and the welders were qualified to both processes within the thickness limitations. When only one process of a combination weld process was specified, the thickness limitation of that process was ensured by Welding Engineering to meet the thickness of the qualification. This case was found only on a combination bi-metallic W.P.S. 1-8BA4. This work was checked and verified by reviewing all of the respective Weld Data Cards and resulted in no violations being found.
- C. All of the weld issue station attendents were provided with additional class room training on all filler metals, especially those with "L" and "ELC" designations. A review of all records revealed that the 308L material had been used only on applications of welding 304 stainless steel and was acceptable to meet design requirements. Based on records of heat numbers of all records where 308L filler metal had been used, a revision to affected documents was made to show the correct type of filler metal used. A Field Change Request (FCR#W-035) was written and approved by the Architect Engineer to allow the use of 308L material on liner plates.

Corrective Steps Taken to Avoid Further Noncompliance:

- A. 1. Responsible personnel in Welding Engineering have been instructed to transmit all W.P.S. revisions to the craft in the field no later than one (1) working day from the time of receipt from Document Control.
2. Steps taken to avoid further noncompliance are as follows:
1. Areas of housekeeping responsibility have been assigned to supervision.
 2. Designated eating areas have been assigned per building for all power block structures.
 3. The monitoring of Zone 5 power block areas by Daniel Technical Services has been intensified.
 4. Re-indoctrination of field supervision to requirements of housekeeping has been accomplished.
 5. The indoctrination of new hire craftsmen will include instruction by the Daniel Training Department as to housekeeping requirements and designated eating areas.
 6. Craft foremen will receive orientation to housekeeping as provided by their respective craft superintendents.
3. CP&L has instructed the Contractor (Daniel Contrustion Company) to keep all pipe ends capped unless work is in process. On a continuing basis CP&L is monitoring to ensure pipe ends are capped when work is not in process. Steps taken to avoid further noncompliance by the contractor are as follows:
1. A meeting was held by the General Pipe Superintendent and all field Piping Superintendents, General Foremen, and Foremen for review of procedure requirements.
 2. A walk-through inspection will be performed by the Pipe Superintendent (or his designee) each week and applicable corrective action will be taken for each tour.
 3. Continued emphasis will be placed on "end cap and/or covering" with Foremen and General Foremen.
- B. Portions of a combination W.P.S. will not be utilized in the welding of a field joint. If a single process is required, a W.P.S. using a single process shall be specified. When a combination procedure is specified, both processes will be used and the welder will be qualified to both processes within the thickness limitation. Documents will also list thickness range requirements.



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C. Additional training was conducted by the Welding Engineering Unit for issue station attendents, warehouse personnel, QA personnel and craft supervision who write material requisitions for welding.

Date When Full Compliance Will Be. Achieved:

A.1. Full compliance is considered to have been achieved on July 10, 1980.

A.2. Full compliance is considered to have been achieved on September 15, 1980.

A.3. Full compliance is considered to have been achieved on September 15, 1980.

B. Full compliance is considered to have been achieved on September 3, 1980.

C. Full compliance is considered to have been achieved on July 30, 1980.

