CP&L

Carolina Power & Light Company

March 11, 1981

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

Dear Mr. O'Reilly:

In reference to your letter of February 17, 1981, referring to RII:WPK 50-400/80-27, 50-401/80-25, 50-402/80-25 and 50-403/80-25, the attached is Carolina Power & Light Company's reply to the deficiencies identified in Appendix A. It is considered that the corrective and preventive actions taken will be satisfactory for resolution of these items.

To the best of my knowledge, information, and belief, the corrective action in this report is true and complete.

Thank you for your consideration in this matter.

Yours very truly,

B. W. Howe

P. W. Howe
Vice President
Technical Services

NJC/mt (0804)
Attachment

cc: Mr. J. A. Jones W/A

Sworn to and Subscribed before me
this 12th day of March, 1981.

Franklin Murray
Notary Public

My Commission Expires October 4, 1981.

FRANKLIN MURRAY NOTARY PUBLIC WAKE COUNTY, N. C.

8104220020

Response to NRC Identified Deficiencies

Condition Reported:

A. 10 CFR 50, Appendix B, Criterion XVI as implemented by CP&L PSAR, Section 1.8.5.16 requires that "Measures shall be established to assure that conditions adverse to quality such as ... deficiencies ... are promptly ... corrected".

Contrary to the above, measures to assure that conditions adverse to quality such as deficiencies are promptly corrected were not adequately established in that NRC infraction 400/80-15-02, 401, 402, 403/80-13-02 reported corrected on August 4, 1980, by CP&L letter dated August 19, 1980, was uncorrected on December 3, 1980.

B. 10 CFR 50, Appendix B, Criterion V as implemented by CP&L PSAR Section 1.8.5.5 requires that "Activities affecting quality shall be prescribed by documented instructions, procedures ..."

Contrary to the above, activities affecting quality were not prescribed by documented instructions or procedures on December 4, 1980, in that: (1) CP&L had no documented procedural requirement for welder qualification bend test thickness tolerance which resulted in bend test specimens being made significantly undersize; and (2) CP&L had no documented procedural requirement for marking welder qualification bend test specimens which resulted in a loss of control of specimen identity.

Denial or Admission and Reasons for Violation:

A. The violation identified by NRC audit was correct as stated. CP&L's analysis of the conditions contributing to the violation identified two (2) major factors. It was concluded that attitudes of site management, craft supervision and individual craft persons were not sufficiently sensitive to project requirements concerning temporary storage of reinforcing steel. Secondly, absence of detailed acceptance criteria for temporary storage of reinforcing steel and inspection thereof contributed to conditions where isolated examples of portions of reinforcing steel bars were allowed to be in contact with the ground and remain uncorrected during the time interval between inspection periods.
In retrospect, it is recognized that the acceptance criteria provided was insufficient to produce the desired results.

B. (1) The violation identified by NRC audit was correct as stated. Most of the welders at SHNPP are tested on pipe with an R. T. test, however some are qualified on plates with side bend specimens to ASME Section IX requirements. Section IX requires side bend specimens to be 3/8" thick with no tolerance specified. The Test Shop had been following Code requirements. In this isolated case, the test shop supervisor was new (second week as test shop supervisor) and these were his first bend specimens. Bend specimen location and size was marked on the test assembly by the shop supervisor prior to their removal. The shop supervisor measured and marked on the plates for 3/8" side bend thickness but failed to take saw blade width and specimen cleaning into consideration when measuring. After removal (sawing) and cleaning, bend specimens were undersize. Site procedure for qualifying welders, MP-02, did not specify tolerances to be observed, since the Code does not specify tolerances. The reporting inspector was shown examples of bend specimens from past qualification testing under the previous shop supervisor which in all cases were acceptable.

(2) This allegation is denied in that procedure MP-02, Rev. 6, does require that upon completion of the welded test assembly, the welder identify his coupon by marking his I. D. number and position tested on the coupon. It is the standard test shop practice that the shop supervisor or his assistant oversee the specimen removal to prevent the possibility of mixing up bend test specimens. As a specimen is removed from the test plate, it is identified by stamping as to the position welded.. Each welder's specimens were kept segregated from the other welder's specimens. Immediately after bending and inspection, the welder is required to tack weld his bend specimens together and mark identification with his badge number and date tested. Examples of past qualification test assemblies were shown to the reporting inspector to verify this.

In the particular instance reported, the welder's test assemblies had been tested just prior to arrival of the NRC Inspector. One welder (66-489) had failed due to rejectable weld inclusions in the bend specimen. The other welder (32-590) had no weld inclusions in the bend specimen and was therefore considered acceptable by the new shop supervisor. At this time, the reporting NRC Inspector had arrived and requested that measurements be taken of the specimens, therefore the welders were not yet requested to tack weld their assemblies together and identify them. During the discussion which followed, the specimens were mixed up by the reporting NRC Inspector as his measurements were performed.

Corrective Steps Taken and Results Achieved:

A. On December 3, 1980 production work associated with reinforcing steel installation was stopped to the extent to fully man a clean up effort to get reinforcing steel in temporary storage areas properly stored so that all portions of each bar were clear of the ground. The two independent site contractors were also required to conduct a similiar effort. The CP&L Site Manager, Senior Resident Engineer and the contractor's top supervision conducted several inspections to ensure the effort was being pursued by the responsible supervision and that a high priority was attached to the effort. The effort included rewashing temporary storage dunnage and was not limited to the isolated conditions where bars could be found touching the dirt or mud. The objective was to upgrade reinforcing steel dunnage practices to minimize potential for inadvertent contact with the ground.

B. (1) After the NRC inspector questioned the thickness of the specimen, the decision on welder 32-590 was reversed by the Test Shop Supervisor. The welder was retested December 9, 1980, on new coupons.

Corrective Steps Taken to Avoid Further Noncompliance:

A. Site administrative procedure AP-X-01 was revised requiring the staging and area superintendents to maintain proper storage levels from the point at which they are issued until they are installed. In addition, the procedure now requires that if an infraction is noted that the Director of Quality Assurance requests corrective action via an internal memo to the Construction Manager with a copy to the Senior Resident Engineer. The Construction Manager shall perform corrective action when requested and shall notify the inspector when the area is acceptable for reinspection at which time a follow-up inspection will be performed. Acceptability will be based on three items:

(1) The program will be considered acceptable if only isolated discrepancies are observed and these are promptly (less than one week) corrected.
(2) The storage area is properly equipped with dunnage.
(3) There are not repetitive isolated discrepancies in a given area that require notification to be corrected.

Since implementing the procedure on January 16, 1981, no problems have been detected.

B. (1) Site procedure MP-02 was revised to include dimensions as specified by the Code, Section IX and thickness tolerances were added (+1/16" and -0".)

(2) The new revision to MP-02 now requires that test coupons be identified prior to beginning of welding with following information: Welders' initials, badge number, and welding test positions. In addition, for pipe welds performed in the 6G & 5G position, the top or "12 o'clock" location on the pipe is marked immediately upon setting up the assembly in the position to be welded. Also MP-02 now requires that prior to the removal from the test assembly bend specimens are marked to identify the welder and position in which the test was performed.

Revision 7 to procedure MP-02 was approved for issue on December 30, 1980.

Date When Full Compliance Will Be Achieved:

A. Full compliance is considered to have been achieved on January 16, 1981.

B. (1) & (2) Full compliance is considered to have been achieved on January 5, 1981.