



Carolina Power & Light Company

USNRC REGION II
ATLANTA, GEORGIA

February 17, 1982

82 FEB 23 All : 31

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 January 18, 1982, referring to RII:
GFM 50-400/401/402/403/81-25, 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, once completed.

Thank you for your consideration in this matter.

Yours very truly,

H. R. Banks
Manager
Corporate Quality Assurance

NJC:jp

Attachment

cc: Mr. J. A. Jones

Sworn to and subscribed before me
this 17th day of February, 1982.

Notary Public

My commission expires:

12/7/86
Date



411 Fayetteville Street • P. O. Box 1551 • Raleigh, N. C. 27602

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PDR ADDCK 05000400
PDR

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

Dear Mr. O'Reilly:

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Response to 81-25-01

~~8203170416~~ YPP

N-212

11-25

Severity Level V Violations

- A. 10 CFR 50, Appendix B, Criterion XV as implemented by CP&L PSAR section 1.8.5.15; CP&L Corporate QA Program section 15.1.3 and construction procedure CQC-2, section 4.2 and 4.3 require that nonconforming conditions be identified and corrected.

Contrary to the above, on December 8, 1981 three nonconforming welded conditions were found that had not been identified previously by CP&L or the material supplier. One undersized fillet weld was found on cable tray support section A (a supplier weld), one separation crack was found on a weld on cable tray support CD-2616 (a shop weld) and the field-applied tack welds had not been removed from or authorized to remain on cable tray support CD-2618. ~~Each of these three nonconforming welded conditions were related to installed and accepted seismic I electrical cable tray supports located in the auxiliary building at about elevation 276'.~~

- B. 10 CFR 50, Appendix B, Criterion IX as implemented by CP&L PSAR section 1.8.5.9; CP&L Corporate QA Program section 8.4.1.d and construction procedure MP-08, section 4.10.2 and AW-1 require that special processes such as welding be accomplished in accordance with applicable codes or standards. The applicable welding code for seismic I electrical cable tray supports is AWS-D1.1-1975, section 9.

Contrary to the above, on December 8, 1981, a field-applied welded "Lap Joint" on electrical cable tray support identified as CD-2618, was found not to have the minimum overlap that AWS-D1.1-1975, section 9.10 requires. Instead of the required five times the thickness of the base metal, the overlap was only four times the thickness of the base metal.

Denial or Admission and Reasons for Violation:

- A. The conditions did exist as identified in the Notice of Violation. The actual cause of the separation crack could not be determined and the undersized fillet weld was due to poor vendor workmanship. Failure to remove the tack welds was due to weld inspector oversight.
- B. The violation is correct as stated. Field personnel (crafts) installing "loose" support members (including beam angles, longitudinal and diagonal braces) failed to exercise care in locating these members during erection. There were also cases when detailed shop drawings utilizing work points did not allow for the required "lap joint" when utilizing material fabricated in accordance with the bill of material. This was a contributing factor to the lack of attention to this detail.

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Corrective Steps Taken and Results Achieved:

- A. Deficiency and Disposition Report number 748 was issued on December 10, 1981, for control and resolution of the vendor items with the separation crack and the undersized fillet weld. Nonconformance Report number W-256 was issued to resolve the tack weld item.

The undersized fillet weld and the separation crack on the cable tray support were repaired. The deficient welds were ground out and the items were rewelded.

The tack welds were ground out and removed.

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- B. A complete reinspection of the field applied welded lap joints on electrical cable tray supports installed prior to December 28, 1981, is presently in progress to identify all similar cases. The reinspection is expected to be complete by April 1, 1982. Upon completion of the reinspection, each case shall be evaluated by the Architect Engineer for structural integrity. Any rework warranted will then be performed.

Corrective Steps Taken to Avoid Further Noncompliance:

- A. A program has been implemented whereby CP&L QC Receiving Inspection will verify that nuclear safety-related items received under an Ebasco or Westinghouse Quality Release meet the requirements of the applicable procurement documents. These inspections will be based on a statistical sampling and shall be accomplished in accordance with the QC Procedures. Characteristics to be verified shall include the following, as appropriate: physical properties, dimensions, weld preparations, workmanship and welding, lubricants, oils and electrical insulation.

Procedure CQC-19 has been revised to insure that inspectors pay special attention to the removal of tack welds on the back side of members welded.

Written instructions were issued on January 11, 1982, by memorandum to the Warehouse Supervisor and the Iron Worker Superintendent to exercise care when handling cable tray support hangers to prevent possible damage. Instructions were also given to report accidentally dropped or damaged items to a QA inspector or the discipline engineer.

The vendor was contacted on December 16, 1981, and agreed to emphasize a more strenuous inspection in areas of handling, porosity, undersized, undercut and cracked shopwelds.

- B. The QA Inspectors have been instructed to inspect for proper overlap of field applied lap joints installed on or after December 28, 1981, and likewise the craft has been instructed as to proper and improper overlaps. Field Change Request AS-1048 reduces the acceptable overlap from "five times the thickness of the thinner part being joined" to one inch. Any joints found to violate the minimum one inch overlap shall be evaluated by the Architect Engineer to determine if any rework is necessary.

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Date When Full Compliance Will Be Achieved:

- A. Full compliance is considered to have been achieved on January 25, 1982.
- B. Full compliance will be achieved by May 1, 1982.

