Appendix B

NOTICE OF DEVIATION

Based on the results of the NRC inspection conducted on April 16-19, 1979, it appears that one of your activities deviate from your commitment to the Commission in the Preliminary Safety Analysis Report (PSAR) as indicated below:

Improper Penetrameter Size Specification

SNUPPS PSAR Section 3.12 commits to Regulatory Guide 1.19, August 11, 1972, "Nondestructive Examination of Primary Containment Liner Welds," except for the following minor deviations, one of which is, "All nondestructive examination methods and techniques are in accordance with Section V of the ASME Boiler and Pressure Vessel Code, except for radiography which is in accordance with Appendix X of ASME Section III." (Appendix X to Section III and Article 2 of Section V are acceptable methods of meeting the requirements of Regulatory Guide 1.19, since their examination requirements are equivalent to those required by the Regulatory Guide.)

Appendix X to Section III of the ASME Boiler and Pressure Vessel Code Table X-3325.1-1, "Stardard Penetrameter Sizes," requires that a penetrameter for weld thickness range of over 1/4" through 3/8" be of a thickness of 0.0075" and designated a No. 7 penetrameter. The liner plate is 1/4" thick.

Contrary to the above:

Bechtel Specification No. 10466-C151(Q), paragraph 7.5.1.a requires that liner seam welds be examined radiographically in accordance with the requirements of Article 3, A°ME Section V, which requires in Table T-320, "Thickness Penetrameter Designations and Essential Holes," that a penetrameter for a single wall material thickness range of over 1/4" through 3/8" be a size No. 12, which has a penetrameter thickness of 0.012". This No. 12 penetrameter is 60% thicker than the No. 7 penetrameter that is specified in Appendix X to Section III of the ASME Boiler and Pressure Vessel Code.

This is a deviation.

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