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PUBLIC
SERVICE
INDIANA

James Coughlin
Vice President
Nuclear

June 7, 1979

Mr. Gaston Fiorelli
United States Nuclear
Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Docket Nos.: STN 50-546
STN 50-547

Dear Sir:

In accordance with the provisions of Section 2.201 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, Public Service Indiana offers the following information in response to Deviation No. 546/79-03-01; 547/79-03-01, Item of Noncompliance No. 546/79-03-02; 547/79-03-02, 546/79-03-03; 547/79-03-03 and 546/79-03-04; 547/79-03-04.

Item of Noncompliance (546/79-03-01; 547/79-03-01)

The Region III Inspector reviewed the process being used in radiographic examination of containment liner welds. The Inspector pointed out a discrepancy in the way the requirements of the Marble Hill PSAR were addressed in S&L Specification Y-2725 and CB&I's radiographic procedure RT2N Rev. 3.

Corrective Action Taken and Results Achieved

No corrective action required at this time. For the requirements on radiography of the containment liner seam welds, the Marble Hill PSAR refers to Appendix X of Section III of the ASME Code. The liner specification for the Byron Station of which PSI's Marble Hill Station is a replicate, was prepared using the radiographic requirements of ASME Section V, Article 3. Consistent with the Marble Hill Replication Design Criteria, Marble Hill replicated the specification. CB&I's corresponding procedure complied with the Marble Hill specification, except as noted below in PSI's response to Item of Noncompliance 79-03-02.

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1000 East Main Street, Plainfield, Indiana 46168 317 . 839 . 9611

Corrective Action to Prevent Recurrence

None

Date When Full Compliance Will Be Achieved

Not required

Item of Noncompliance (546/79-03-02; 547/79-03-02)

The Region III Inspectors review of the radiographic examination methods used on the containment liner also indicated that S&L Specification Y-2725 required a 1.5 minimum radiographic film density for single viewing. The Inspector pointed out that CB&I radiographic procedure RT2N Rev. 3 states: "The minimum film density through the weld metal shall be 1.3 minimum for single viewing..." This discrepancy between the two minimum densities is in violation of the requirements of S&L Specification Y-2725.

Corrective Action Taken and Results Achieved

Deviation Control Records Nos. C-008-79 and C009-79 respectively were written to document and follow corrective action. DCR C-008-79 was written to CB&I for deviating from the specification requirement, and DCR C-009-79 was written to Sargent & Lundy Engineers (Licensee's A/E) for approving a procedure which did not meet specification requirements.

The 1.3 film density indicated in CB&I procedure RT-2N meets the requirements of the Winter 1974 Addenda of the ASME Boiler and Pressure Vessel Code, Section V, Article 3. The Marble Hill specification required the film density of 1.5 in order to obtain additional assurance of the film quality beyond the above requirements. While CB&I's procedure RT-2N did not meet the specification, it did meet the Code requirements regarding film density.

The films already processed will be sampled using industry accepted sampling techniques to assure the 1.5 film density was met, in that all film were previously reviewed and accepted by PSI or S&L. For future work CB&I has been advised to revise their procedure to comply with the specification.

Corrective Action to Prevent Recurrence

Deviation Control Record C-009-79 was written against S&L. PSI has recommended S&L comply with their Quality Control Manual procedures used in the review of contractor-submitted procedures. Deviation Control Record C-008-79 was written against CB&I. CB&I has been advised to revise their procedure and to comply with the specification requirements in all cases.

Date When Full Compliance Will Be Achieved

June 30, 1979

Item of Noncompliance (546/79-03-03; 547/79-03-03)

Contrary to the requirements of 10CFR50, Appendix B, Criterion X "Inspection," it was determined that adequate QC inspection was not being performed as demonstrated in the following examples:

a) Whalen-Chilstrom Joint Venture (WCJV) QC Inspector had completed the sign-off of the placement check sheet for acceptance of reinforcing steel in placement #1SS-377-1 prior to contaminants being removed from the reinforcing steel and prior to all reinforcing steel being secured against displacement during concrete placement.

b) Newberg QC Inspector completed sign-off of pour #1SS-377-1 placement checklist prior to the completion of adequate clean-up.

c) Newberg QC Inspector completed sign-off of pour #1SS-377-1 to release the area for placement of concrete prior to the completion of a and b above.

d) Newberg QC Inspection personnel failed to adequately inspect concrete surfaces after form removal as required by Newberg QAPN-10 Rev. 3 to identify, tag, and repair areas of defective concrete in the Auxiliary and Unit #1 Reactor Buildings.

e) Newberg QC Inspector failed to inspect defective concrete repairs to verify the curing of the repair patches in accordance with ACI 301-72 Chapter 9 and Newberg WPN-25 Rev. 0.

Corrective Action Taken and Results Achieved

a) The reinforcing steel found to be not secured was retied and reinspected.

b) None required.

c) None required.

d) All concrete production areas were reinspected, tags applied as applicable, and curing checked.

e) None required.

Corrective Action Taken to Prevent Recurrence

a)* A special training seminar was initiated by the WCJV QA Supervisor for all QC inspectors reviewing the requirements for final inspection acceptance. This training was completed May 6, 1979.

b)* A special training session was initiated by N-MH QA Supervisor for all QC inspectors on the implementation of procedure QAPN-10. Each inspector was also instructed not to sign-off a pour area until that area is acceptable. This training was completed May 12, 1979.

c)* See item b above.

d)* Additional training was conducted with production and quality control personnel on the implementation of N-MH procedures WPN-9 "Concrete Placement-Cure-Finish" and WPN-25 "Major Void Concrete Repair." This training was conducted on May 9, 1979, and May 10, 1979.

e)* See item d above.

Date When Full Compliance Will Be Achieved

May 13, 1979

Item of Noncompliance (79-03-04)

Contrary to the requirements of 10CFR50, Appendix B, Criterion II "Quality Assurance Program," it was found that Whalen-Chilstrom Joint Venture's QA/QC program did not provide for the proper indoctrination and training of post-tensioning QC personnel. In addition, WCJV records showed that the qualification certification requirements of ANSI N45.2.6 were not met for the post-tensioning personnel.

Corrective Action Taken and Results Achieved

Attachment G of WC QAP-7 (Certificate of Qualification) for the post-tensioning embedment inspector has been updated to include this added responsibility.

Corrective Action Taken to Prevent Recurrence

The WCJV QA Supervisor performed a review of his QC inspection personnel to verify that all are properly certified in accordance with ANSI N45.2.6.

*Note: Corrective action stated above has proven to be inadequate as revealed during the NRC inspection of 4-30-79 through 5-3-79. PSI is reviewing the adequacy of the corrective actions previously taken, and is developing additional corrective measures.

Date When Full Compliance Will Be Achieved

May 9, 1979

Very truly yours,

James Coughlin

James Coughlin
Vice President-Nuclear

JC:jb

cc: E. R. Schweibinz, P.E.