

# NSP

NORTHERN STATES POWER COMPANY

MINNEAPOLIS, MINNESOTA 55401

February 1, 1979

Mr. R. F. Heishman, Chief  
Reactor Construction and  
Engineering Support Branch  
Region III  
United States Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Dear Mr. Heishman:

PRAIRIE ISLAND NUCLEAR GENERATING PLANT  
Docket No. 50-306

In response to your letter of January 16, 1979, which transmitted  
Inspection Report 50-306/78-21, the following information is offered:

Deficiency

- a. Paragraph 8.6.4 SNT-TC-1A, 1975 Edition requires that a composite  
grade of 90% is necessary to pass the test.

Contrary to the above, Lambert, MacGill, Thomas, Inc. procedure  
No. QA-6, Revision 6, "Qualification and Certification of NDE  
Personnel", March 6, 1978, did not state that for NDE Level III  
personnel, a composite grade of 90% is required to pass the test.

- b. Lambert, MacGill, Thomas, Inc. Procedure No. QA-6, Revision 6,  
March 6, 1978, "Qualification and Certification of NDE Personnel",  
SNT-TC-1A, 1975 Edition, requires experience prior to taking an  
examination for any NDE method.

Contrary to the above, two NDE personnel certifications received  
did not document previous NDE experience.

Response to a

The code governing our In-Service Inspection Program, ASME Section XI,  
1974 Edition, through and including the Summer 1975 Addenda, requires  
that "personnel performing nondestructive examination operations shall  
be qualified with a procedure prepared in accordance with SNT-TC-1A  
for the applicable examination technique and method." Lambert,

EB 5 1979

7903070478

# NORTHERN STATES POWER COMPANY

Mr. R. F. Heishman  
February 1, 1979  
Page 2

MacGill, Thomas, Inc. (LMT) Procedure No. QA-6, Revision 6, entitled, "Qualification and Certification of NDE Personnel", was prepared to meet the guidelines established in SNT-TC-1A (June, 1975, Edition). SNT-TC-1A states that "in developing his written practice as required by Paragraph 5, the employer shall review the detailed recommendations presented herein, and shall modify them as necessary to meet his particular needs."

Although the LMT procedure didn't specifically state that for NDE Level III personnel a composite grade of at least 90 percent is required to pass the tests, it does require the individual to successfully complete a specific examination, a practical examination, and obtain at least an 80 percent grade on the general examination. The LMT Level III individual on site was certified in accordance with Procedure No. QA-6. The certification papers were reviewed and all of his composite grades (for each NDE method he was certified) were above 90 percent.

The procedure has been revised to include a composite grade of at least 90 percent (for Level III) in the process of gearing up the program to future editions and addenda of Section XI that will become effective. The revised procedure will be included in the next revision of the LMT QA Manual.

## Response to b

A certification statement was at the site for each examiner. This statement identifies the individual, level of certification, a brief statement on education, background and experience, certification dates, examination grades, etc. In addition to this, a resume was included for some of the examiners. After the inspector identified his concerns, the LMT home office was contacted and a resume was telecopied to the site for B. K. Graham and V. R. March.

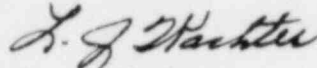
B. K. Graham and V. R. March did have their experience documented. Their certification records, including detailed documentation on their training, experience, etc., were maintained at the LMT home office. There is no requirement that the examiners' experience be maintained at the plant site. LMT's QA Manual was approved by Northern States Power Company. This included the procedure for Qualification and Certification of NDE Personnel which identifies the requirements for maintaining certification records. Contrary to the statement on page 6 of Report No. 50-306/78-21,

NORTHERN STATES POWER COMPANY

Mr. R. F. Heishman  
February 1, 1979  
Page 3

B. K. Graham and V. R. March did not perform any ultrasonic examinations. They operated strip chart recorders used for automatic data recording of the ultrasonic examination. A certified Level II ultrasonic examiner performed the examinations.

Yours very truly,



L. J. Wachter  
Vice President  
Power Production and  
System Operation

cc: Mr. G. Charnoff