

# PHILADELPHIA ELECTRIC COMPANY

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SHIELDS L. DALTROFF  
VICE PRESIDENT  
ELECTRIC PRODUCTION

November 28, 1978

Re: Docket No.: 50-277

Inspection No. 50-277/78-27

Mr. Robert T. Carlson, Chief  
Reactor Construction & Engineering  
Support Branch  
Office of Inspection & Enforcement  
US Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, PA 19406

Dear Mr. Carlson:

Your letter of November 7, 1978 forwarded Inspection Report 50-277/78-27. Appendix A to your letter addresses two items which did not appear to be in compliance with Nuclear Regulatory Commission requirements. Items A and B are infractions. As your letter indicates, Item B has been resolved and requires no further response. Item A is restated below with our response.

10 CFR 50, Appendix B, Criterion IX, states, in part, that: "Measures shall be established to assure that special processes, including...nondestructive testing, are controlled and accomplished by qualified personnel using qualified procedures in accordance with applicable codes...and other special requirements."

Contrary to the above, on September 21, 1978, radiographs of Nuclear Class 1 pipe welds were being processed without written procedures to assure quality of final radiographs.

## Response

Philadelphia Electric Company requires any nondestructive testing contractor to supply his written nondestructive

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testing procedures for review and approval prior to that contractor performing any nondestructive testing. In accordance with this requirement, the contractor performing the radiography referenced in Item A above submitted his written radiographic procedures which were reviewed and approved by Philadelphia Electric Company personnel on September 12, 1978.

The contractor's radiographic procedure states in Section 3.1 entitled, "Film Processing", and Paragraph 3.1.1, "Procedure for Processing", that:

"All film shall be processed in accordance with Part III of Recommended Practice SE-94."

Recommended Practice SE-94 is included as Article 22 of Section V of the ASME Boiler & Pressure Vessel Code and contains a procedure for the processing of radiographs which meets ASME Code and NRC requirements for quality.

A review of this contractor's quality assurance procedures by Philadelphia Electric QA personnel, however, concluded that although the contractor had established written procedures for the processing of radiographs to required quality levels, there was insufficient documentation provided to assure that radiographs were being processed in accordance with the required procedure. To remedy this situation, effective November 20, 1978, all nondestructive testing contractors performing radiography will be required to submit written documentation of the variables utilized during film processing, thereby assuring that all radiographs are being processed in accordance with established procedures.

Should you require any further information on this subject, please do not hesitate to contact us.

Very truly yours,

