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F. L. CLAYTON, JR.
Senior Vice President

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December 2, 1980

J. M. Farley Nuclear Plant
NRC Inspection of August 25-27, 1980

Mr. C. E. Murphy
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, N.W.
Suite 3100
Atlanta, Georgia 30303

Dear Mr. Murphy:

Re: RII: BRC
50-364/80-33

This letter is to explain the corrective steps taken as a result of the item of noncompliance brought to our attention in your letter of September 18, 1980 and your letter of November 20, 1980 requesting further explanation.

Item 1.a of IE Bulletin 79-13 required radiographic examination of nozzle to reducer welds in the feedwater lines with the area of inspection to include the weld and two base material thicknesses on either side of the weld. Evaluation of the radiographs was to be in accordance with ASME Section III, Subsection NC, Article NC-5000 of the 1977 edition to the 2T penetrameter sensitivity level, in lieu of Table NC-5111-1. In complying with this requirement Weld C-1 of Loop C was radiographed and evaluated. This radiograph included adjacent pipe and nozzle areas within a distance equal to at least two wall thicknesses and was evaluated in accordance with ASME Section III, Subsection NC, Article NC-5000 and FNP-0-GMP-51. Subsequent review of this radiograph during the NRC inspection resulted in deficiency 50-364/80-33-01 because a discontinuity image on the film was 0.3 greater than the density tolerances allowed by FNP-0-GMP-51. Alabama Power Company's response concerning the discontinuity image is explained in my letter to you dated October 15, 1980. At the time of the inspection a second radiograph was made of Weld C-1 and the density in the discontinuity area was within tolerance. In your inspection report you stated the following: "Based on the fact that the density did not meet procedure requirements in only one view in one small area and the area could be examined for the purpose of the bulletin, this item has minimal safety significance and, therefore, is a deficiency". As stated in my letter of October 15, 1980,

we do not normally take density readings directly on a discontinuity image but take readings within the general weld area. Based on your letter of November 20, 1980, the NRC's interpretation of the intent of IE Bulletin 79-13 is as follows: "The area of interest shall include the weld and two base material thicknesses on either side of the weld. In addition to code requirements for normal weld radiography, film density tolerances allowable by the code shall apply throughout the entire area of interest including discontinuity images."

In response to your requests, we submit the following:

(1) Corrective steps which have been taken by you and the results achieved.

Response: (a) Weld C-1 was radiographed during the inspection and the second radiograph had acceptable density readings. The second radiograph will be retained as the official record of compliance with IE Bulletin 79-13.

(b) The additional radiographs taken subsequent to hot functional testing will be retained for information purposes only. During the first refueling on Unit 2, the remaining portions of the feedwater welds will be radiographed to meet the requirements of IE Bulletin 79-13.

(2) Corrective steps which will be taken to avoid further non-compliance.

Response: IE Bulletins and other similar documents will be carefully reviewed to identify requirements which go beyond normal NDE methods and evaluations. Testing personnel will be properly instructed in meeting any special requirements. In particular the pipe weld radiographs to be made and evaluated during the first refueling to comply with the remaining portion of IE Bulletin 79-13 will follow special instructions to satisfy the intent of the IE Bulletin.

(3) The date when full compliance will be achieved.

Response: Full compliance will be achieved as of 12-2-80.

The information contained in this letter is not considered to be of a proprietary nature.

Sincerely yours,

for F. L. Clayton, Jr.

FLCJr/JGS:nac