

8004300

119

SOUTH CAROLINA ELECTRIC & GAS COMPANY

POST OFFICE BOX 764

COLUMBIA, SOUTH CAROLINA 29218

M. C. JOHNSON

VICE PRESIDENT AND GROUP EXECUTIVE
SPECIAL SERVICES AND PURCHASING

March 12, 1980

RECEIVED
MAY 19 10:39
ATLANTA

U. S. Nuclear Regulatory Commission
ATTN: Mr. James P. O'Reilly
Director
Region II
101 Marietta Street, NW
Atlanta, Georgia 30303

Subject: V. C. Summer Nuclear Station
Unit #1
Response to NRC Audit Reports
50-395/79-35 dated 2/13/80 and
50-395/80-03 dated 2/11/80

Gentlemen:

In response to the above captioned reports, we have reviewed the information there-in contained and find no proprietary information. In addition, we have evaluated the circumstances relating to the items of noncompliance reported in these reports and provide the following results of that evaluation:

79-35-01 Dealt with the procedural omission of ASME Code minimum weld fillet sizes for socket weld flanged fittings.

1. Cause

The cause of the condition is attributed to oversight in the preparation and review of drawings and instructions. In particular, drawing C301-002, prepared and reviewed by the Architect/Engineer, resulted in the omission of weld fillet size for socket-welding flanges. The condition remained undetected during the preparation of welding procedures. Since QC procedures refer to the welding procedures for weld size, instructions issued to perform work never addressed fillet size for socket-welding flanges. Only fillet weld size for pipe sockets were stipulated in the welding procedures and were used by inspectors for all socket welds including flanges, yielding little probability of detection during inspection.

2. Immediate Corrective Steps Taken

Drawing C301-202 was revised on November 2, 1979 to incorporate ASME Code requirements for weld fillet size of socket welding flanges.

LEGISLATIVE COPY

Also, appropriate welding procedures were revised by December 1, 1979 to stipulate ASME code requirements for weld fillet size of socket welding flanges. The impact on the hardware welded prior to the correct weld sizes being stipulated will be assessed in conjunction with infraction 79-35-02 on undersize socket welds.

3. Corrective Steps To Avoid Future Noncompliance

Personnel involved with the preparation of instructions and drawings have been instructed to verify that all technical requirements, including ASME code requirements are satisfied. This is particularly emphasized for any current revisions being made to instructions and/or drawings, since the initial preparation in most cases was performed during past years by personnel who are not necessarily still involved in the process. These actions should be completed by March 28, 1980.

79-35-02 Dealt with fillet welds on two inch and under socket welds failing to meet minimum ASME size requirements. The cause and corrective actions relating to this item of noncompliance have been previously submitted to Region II as part of a 10CFR50.55(e) report dated December 5, 1979. Please refer to that correspondence in conjunction with this item of noncompliance. The projected completion date of the actions to correct this condition is July 1, 1980.

80-03-01 Dealt with the adequacy of ultrasonic inspection methods used to upgrade ASME Class 2 pipe for Class 1 application.

1. Cause

Within the QA program, it was discovered that pipe of heat #BZA3K, which did not carry a serial number which provides traceability to ASME Class 1, was installed in a Class 1 system. A nonconformance notice was written to document this installation. The Constructor's engineering personnel performed investigations into the vendor documentation supplied for the installed pipe to determine whether it was acceptable for use or would need replaced. The reviewing engineer concluded that the installed pipe was acceptable for use in a Class 1 system based on the fact that all pipe of heat #BZA3K was traceable to vendor documentation and that the vendor documentation reflected that all pieces of that heat had been ultrasonic tested (UT'd) and met ASME Class 1 criteria. The Engineer dispositioned the nonconformance notice to accept the pipe "as is". During the evaluation process, the Engineer involved failed to check the specification by which the pipe was supplied, and therefore detect the additional UT requirements placed on the supplier to meet Regulatory Guide requirements. The reviewing Engineer was familiar with the piping specification involved, but failed to perform, resulting in the condition stated in this infraction.

2. Immediate Corrective Steps Taken

The fact that the Class 1 system still contained pipe that was not properly UT'd was documented by a new nonconformance notice. Investigations revealed that both Class 1 and Class 2 pipe were supplied from heat #BZA3K. The portion of this heat supplied Class 1 did receive the correct UT while the portion supplied Class 2 received only Code UT. An attempt was made to UT the questionable pipe in place since it could not be determined whether it was supplied as Code Class 1 or the Code Class 2. Most of the pipe was UT'd in place and found to be acceptable for Class 1 application. Since all the questionable pipe could not be examined, this nonconformance notice was dispositioned by SCE&G Nuclear Engineering to remove the pipe in the Class 1 system having heat #BZA3K, and replace it with other Class 1 pipe. These efforts are within the nonconformance program and are tentatively to be completed by October 1, 1980.

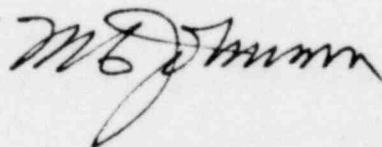
3. Corrective Steps to Avoid Future Noncompliance

The particular Constructor's Engineer responsible for the erroneous disposition of the original nonconformance notice has been made, and is fully aware of his mistake and has been directed to completely investigate all design and Code requirements prior to dispositioning nonconformances.

In addition, DCC work and inspection procedures are to be reviewed to assure clarity of which identification markings must be transferred when Class 1 pipe is cut; as it is believed an omission of transferring a SN took place in this case, causing the need for the original nonconformance notice. The tentative completion date for procedure review is March 22, 1980.

We trust that you will find the actions to resolve these items of non-compliance appropriate and satisfactory. Please feel free to contact us if any additional information relating to these items is required.

Very truly yours,



DRM/DAN/MCJ/jls

cc: C. J. Fritz
G. C. Meetze