FLORIDA POWER CORPORATION
ST. PETERSBURG, FLORIDA

December 16, 1971

Atomic Energy Commission
Division of Compliance
230 Peachtree Street N.W.
Atlanta, Georgia

Attention: Mr. John G. Davis,
Director, Region II

Subject: AEC/DOC Letter November 24, 1971
CO: II: RFW - 50-302/71-4 -
FPC File Q - AEC/DOC Site Visits

Dear Mr. Davis:

In response to the subject letter, we wish to present the following comments concerning the items in the enclosure. This response will include the actions taken both past, present and future which are relevant to the subject activities. We also delineate changes in our policies or procedures to prevent reoccurrence of the activities which precipitated your letter.

Our response is presented in the same order as your enclosure.

Item 1

As a general comment to this entire item, we should state that the specific storage and inspection requirements for each piece of equipment are determined by one of two methods. For B & W supplied equipment, the B & W Quality Control inspector determines the in-storage inspection and in-storage maintenance requirements from the B & W field specifications and the manufacturers' instruction manuals and inspects the equipment accordingly. For equipment not furnished by B & W, the equipment lists published by Gilbert Associates designate the items within the Quality Program. For each item in the Quality Program an inspection report is prepared, designating the storage and maintenance requirements as determined from the manufacturers' instruction manuals, the Gilbert Associates' specifications, and/or the Gilbert Associates' requirement outlines.

Item 1a

The storage and inspection requirements for the Nuclear Steam Supply System components are specified in the B & W Field Specification for NSSS components. Requirements are explicit and detailed for the reactor and other major components. Requirements in Section FS-II-I are more general for items such as heat exchanges, but do specify storage conditions required, such as: indoor storage - with heat and moisture control, indoor storage - without heat, outdoor heat -

with weatherproof cover, outdoor storage - without weatherproof cover. In addition, the manual does specify where manufacturers' recommendations are to be used either in lieu of, or in addition to, B & W requirements. The let-down coolers in question were stored indoors without heat, and lacking any special storage requirements specified by the manufacturer, they were left crated for physical protection. Upon receipt of your letter, the coolers were uncrated for inspection. Their condition was clean and with all openings sealed. An inspection report was filed with our site Quality office.

In addition, B & W site personnel contacted the B & W Nuclear Products group and requested an upgrading of the field specifications to include more specific storage and inspection requirements where necessary. These additional requirements will be implemented on the job site as soon as they are received. This revision of the field specifications is necessary due to the delay in the construction of this unit requiring longer term storage than was originally anticipated.

Item 1b

The apparent delay in correcting the in-storage conditions for the Makeup Pumps reported in B & W Deficiency Report #7 dated 7/15/71, but not reported corrected until 10/27/71, was due to a lack of adequate procedures regarding coordination and reporting during the early stages of our in-storage inspection and in-storage maintenance program. Upon further checking after the site DOC visit that precipitated your document, we were able to collect maintenance records for the subject pumps.

In-storage maintenance records prepared by the Millwrights on 8/19/71 and 9/24/71, stated that the pumps were in good condition, and verified that they were not being neglected during this time span even though the specific action necessary to close the deficiency report was not reported corrected. A summary of the inspections are on file at our site Quality office.

To guard against recurrences of this nature, B & W Quality Control has been instructed to contact the specific contractor's Quality Control Coordinator directly when workmen are required to correct a storage condition, and the specific contractor's Q/C Coordinator has been directed to provide the necessary workmen promptly.

Craft foremen have also been designated for instorage inspection and maintenance duties to provide for continuity for this important program. A Quality Control organizational chart is attached to illustrate the lines of communication provided by our system.

Item 1c

A similar condition exists for the records of the Steam Generator inspections as stated previously in Item 1b. A review of our in-storage inspection and in-storage maintenance program verified that inspections have been made and

in-storage maintenance program verified that inspections have been made and in-storage maintenance is being conducted. Furthermore, our personnel had been geared to a monthly cycle instead of the 30 day cycle requirement as stated in our present procedures. The inspection summary for the Steam Generators is on file at the site office.

In addition to the documentary inspections, we can verify by verbal evidence that the purge on the steam generators was checked every Monday. A letter confirming that fact and giving the procedures followed is also on file at our site Quality office.

We have now revised our inspection schedules to assure that they will be made within the 30 day period and that inspection report forms and/or logs will be prepared for documenting all inspections and maintenance. Measures to improve our in-storage inspection and maintenance program were being established prior to the receipt of your letter. These are summarized as:

1. A B & W Contract Equipment Inspection Schedule was initiated on May 20, 1971.

2. Reports for in-storage inspection and maintenance of electrical equipment was initiated on April 14, 1971.

3. Reports for in-storage inspection and maintenance of mechanical equipment outside the B & W contract was formalized on November 1, 1971. Samples of completed reports for the above are also available at the site Quality office.

In addition to the above, the following action has been taken to improve the performance of our Quality Control effort in the area of in-storage inspection and instorage maintenance.

A. The total in-storage inspection and in-storage maintenance program was reviewed with the newly appointed site Quality Control supervisor Mr. John Rashinsky.

B. Written instructions were issued on December 7, 1971

   1) To B & W Construction and the electrical Q/C coordinator (E. C. Ernst Co.) regarding the routing of all documentation to the Q/C supervisor for Florida Power Corporation.

   2) To all contractors performing in-storage inspections that these inspections shall be performed at least once every 30 days instead of each calendar month.

   3) To all contractors performing in-storage inspection regarding availability of appropriate craft manpower to perform essential in-storage maintenance and/or inspections.

Item 2

The questions raised by the discovery of valves supplied for Crystal River Unit #3 having wall thicknesses that were less than the minimum specified in the applicable U.S.A.S. Standard as stated in our Purchase Order have now been pursued through what has been at times an extremely tortuous task. We have had innumerable meetings, conferences, and correspondence with both the supplier and our engineer and have now determined what the specific problem was. The subject valves were purchased to U.S.A.S.-B.16.5. The manufacturer had designed these valves, as far as the casting is concerned, to the newer Section III of the ASME code. We have taken the position that the valves must be proven acceptable on an undividual case basis to our engineer Gilbert Associates. Therefore, we had directed the engineer to supply the valve manufacturer with the appropriate engineering criteria that the valves must fulfill. These included end forces for the determination of the strength requirements for these valves that would be in addition to the requirements imposed by the pressure of the fluid. The valve manufacturer submitted a series of calculations to us that we forwarded to the engineer.

The present status of these valves is:

A. They are rejected in their present condition due to the application of a deficiency report prepared at site.

B. "Preliminary analysis" of the data supplied by the valve manufacturer indicates that in order for these valves to be acceptable, all bases for their acceptance must be under the same code. For example, one requirement may not utilize B16.5 whereas another is satisfied under the requirements of Section III. Present indications are that the valves will have to be returned to the vendor for additional non-destructive testings to satisfy the requirements of Section III. Hopefully, this question will have been resolved prior to the next scheduled site visit by your inspectors.

During the last site visit, December 7 - 10, 1971, we presented a package containing the complete documentation file justifying the acceptance of the steam generator anchor bolts to your inspectors. If there are any questions regarding the information contained in these documents, please notify me.

In summary, we wish to convey to you that the apparent deficiencies referenced in your letter are actually deficiences in the procedures that were being followed during the period prior to your compliance visit or in effect at that time. The required inspections were in fact being performed although we agree our administrative functions in this regard were deficient. The steps taken to improve the control and documentation of our in-storage inspection and maintenance program both before and since your compliance visit should provide a more satisfactory approach to this problem. We expect that under the new Quality Control organizational chart, additional procedures and directives will be issued that further improve this important phase of our construction activities.

If you require further clarification of this response, please notify us and we will provide you with whatever information you require.

Very truly yours,

J. T. Rodgers
Asst. Vice President &
Nuclear Project Manager

JTR/cfb
Enclosures

cc: H. L. Bennett
W. A. Szelistowski
M. H. Kleinman
E. E. Froats

FPC CR 3
QUALITY CONTROL ORGANIZATION