## PACIFIC GAS AND ELECTRIC COMPANY

April 2, 1980

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Mr. R. H. Engelken, Director Office of Inspection and Enforcement Region V U. S. Nuclear Regulatory Commission 1990 N. California Boulevard Walnut Creek Plaza, Suite 202 Walnut Creek, California 94596

> Re: Docket No. 50-133 License No. DPR-7

Dear Mr. Engelken:

This is in response to your letter dated January 21, 1980, which enclosed IE Bulletin No. 80-02 concerning the use of f. edwater spargers and thermal sleeves manufactured by Marvin Engineering Company.

The action statements of the Bulletin and our responses are given in Attachment A.

Very truly yours,

Philip a Grane,

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Attachment

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PACIFIC GAS AND ELECTRIC COMPANY HUMBOLDT BAY FOWER PLANT NO. 3 DOCKET NO. 50-133 LICENSE NO DPR-7

ATTACHMEN~ A

RESPONSE TO I.E. BULLETING NO. 80-02

I.E. Bulletin 80-02, concerning feedwater spargers and thermal sleeves, requested that we provide a written report describing our findings relative to the following items:

"1.a. Have reactor feedwater spargers and thermal sleeves manufactured and/or fabricated by the Marvin Engineering Company been purchased and/or installed in your facility? Since Marvin Engineering is principally a subcontracting Company, determine if your equipment originated with the Marvin Company and was eventually supplied to your facility through another contractor/supplier."

A replacement sparger and thermal sleeve were installed in our reactor in 1977; however, it was not manufactured by the Marvin Engineering Company. The sparger and thermal sleeve were designed and specified by the General Electric Company and were manufactured by the Associated Piping and Engineering Corporation (AP&E Corp.).

"l.b. Provide a description of this equipment to include its purchase date and its design function during both normal and accident conditions."

The design function of the sparger during normal conditions is the annular distribution of feedwater within the reactor vessel.

The function of the sparger during accident conditions is, again, the annular distribution of feedwater within the vessel during high pressure core flooding. This, however, is not a design function since feedwater distribution within the reactor vessel is not a design criteria of the high-pressure core flooding system.

The sparger and assembly design specification was certified December 7, 1976. The shipping date for the sparger and the majority of the support equipment was January 28, 1977.

"2. For each piece of identified equipment, provide the performance history associated with its usage. This should include the cause of any failures or malfunctions and the frequency of such events."

Humboldt Bay Power Plant Unit No. 3 has been shutdown since July, 1976; therefore, the replacement sparger has never been used and no performance history data is available.

"3. Provide information on the supplier's and receiver's QA/QC program in effect at the time of purchase. This information should be discussed in terms of it providing sufficient bases for judging that the integrity of the equipment is sufficient to permit plant operation during normal and accident conditions."

According to documentation signed by the supplier's (AP&E Corp.) Quality Control Manager, the sparger assembly was "manufactured under a controlled quality assurance program and (it is) in conformance with the procurement quality requirements including applicable codes, standards and specifications as identified in the (purchase order)."

The receiver (G.E. Company) states in documentation signed by the G.E. QA Representative, that its Quality Assurance program is able to review and certify, on the basis of supporting evidence, as acceptable the supplier's quality control program.

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Pacific Gas and Electric Company ordered, received and installed this equipment with the appropriate application of its corporate nuclear quality control and assurance programs. This, in combination with the two programs mentioned above, provide sufficient bases for judging that the integrity of the equipment is sufficient to permit plant operation during normal and accident conditions.