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POWER PIPING COMPANY

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March, 27, 1980

U.S. Nuclear Regulatory Commission, Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76012

Reference: Docket No. 99900701/80-01

Gentlemen:

In response to your letter of findings based on the NRC inspection performed at Power Piping Company, Donora, PA, we propose the following responses.

FINDING A

"Standard Nuclear Procedure for Fit-up and Manual Welding of Carbon Steel, PCP-28, paragraph 2.0, states in part, 'QC verify that preheat is acceptable.'

Contrary to the above, QC did not verify that preheat was acceptable in that the QC inspector recorded a minimum preheat of 60° F for a tack welding operation on the Process Control Sheet 1017-012-04 although the shop fabrication sheet required a minimum preheat of 200° F for welding."

POWER PIPING RESPONSE

Actions taken to correct the problem:

The subject fabrication 1017-012-04 (ASME Code Class 2) was identified as deficient and a Nonconformance and Disposition Report (NCDR) No. 641 was initiated in accordance with our Quality Assurance Manual.

An investigation of the deficiency revealed that the inadequate preheat discrepancy was related to welding of temporary attachments to the subject fabrication for the alignment (fit-up) operation. Because the deficiency occurred in welding temporary attachments which require removal and subsequent NDE must be performed, the magnitude of the discrepancy (inadequate preheat) did not create an adverse effect on the subject fabrication.

In discussing the matter with the assigned welder and QC Inspector, both stated that the correct preheat temperature was applied prior to tackwelding and that the discrepancy was in recording of the incorrect temperature by the QC Inspector. These statements could not be substantiated with documented evidence.

The removal of the temporary attachments and subsequent NDE performed to satisfy ASME Code requirements revealed no discontinuities in the weld area.

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Based on this investigation and the NDE examinations performed, the NCDR No. 641 was dispositioned "Accept as is" and no further action is required.

Actions Taken to Prevent Recurrence:

The Inspection Section personnel have been given additional training in the areas of proper recording of information and proper execution of the requirements stated in procedures and on the shop fabrication sheet.

Additional training has been given on the overall responsibilities for the proper execution of the documentation on the In Process Control sheets.

In addition, the Section Supervisor has been instructed to perform independent surveillance of the QC Inspectors to ascertain the effectiveness of the additional training.

Date of Corrective Action and Preventive Measures:

Corrective action for Finding A was initiated January 10, 1980; completion date will be April 7, 1980.

Preventive measures were implemented January 29, 1980. The follow-up of supervisory surveillance will be completed March 28, 1980.

FINDING B

"Article 2 of Section V of the ASME Code, paragraph T-272, states in part, 'If the radiation passes through one wall and inaccessibility prevents source-side placement of the penetrameter, a film side penetrameter may be used...'

Contrary to the above, a film side penetrameter was used to radiograph a butt welded joint, RT-1081-03A, Weld A, although the weld was accessible for source-side placement of the penetrameter."

POWER PIPING RESPONSE

Actions Taken to Correct the Problem:

The subject radiographed weld joint R-1081-03A, Weld A, was re-radiographed using the proper source-side penetrameter.

Actions Taken to Prevent Recurrence:

The assigned personnel in the Radiography Section were given additional training in the area of penetrameter selection and use.

In addition, the NDE Level III has been instructed to perform independent surveillance of the personnel to ascertain the effectiveness of the additional training.

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Dates of Corrective Action and Preventive Measures:

Corrective action for Finding B was initiated January 10, 1980. The completion date was January 10, 1980.

Preventive measures were initiated for Finding B January 21, 1980. The completion date for the supervisory follow-up will be March 28, 1980.

FINDING C

"Section D-QA-10 of the QA Manual, paragraph 5.4.5, states in part, 'QC welding material clerks shall document the release of electrodes, using a welding electrode requisition made out in duplicate. One (1) copy of the requisition remains at the oven, and one (1) copy accompanies the issued material.'

Contrary to the above, a copy of the welding electrode requisition did not accompany the issued material observed in a portable oven containing approximately ten (10) pounds of 3/32", 7018 electrode. It was further noted that some weld electrode requisition slips were not complete, in that, weld numbers were not filled in and one did not have authorization number or the shop sheet recorded."

POWER PIPING RESPONSE

Actions Taken to Correct the Problem:

The subject requisition slips were identified and the necessary information was recorded.

Actions Taken to Prevent Recurrence:

The Weld Material Clerks and the QC Inspectors were given additional training in the proper execution and handling of the weld electrode requisition slips.

Comment:

One area of the finding stated that weld numbers were not recorded on the weld electrode requisition slips. It is Power Piping's position that this is not a requirement of our quality program: neither the Quality Assurance Manual nor the Procedure for Issuance and Control of Welding Material, PCP-22, requires the recording of the weld number on the weld electrode requisition slips. While there is a block for recording weld numbers on the requisition slip, it is not used because to record the weld numbers there would be a duplication of effort. The In Process Control sheet (IPC) is used to document the filler material used for a specific weld joint.

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Since there may be some confusion in the use of the requisition slip with regard to the weld number block, we have taken further steps to clarify this through the issuance of specific instructions as a supplement to Procedure PCP-22 that identifies who is to record what and at what time for these requisition slips.

In addition to the above, the Section Supervisors have been instructed to conduct independent surveillance to ascertain the effectiveness of the training.

Date of Corrective Action and Preventive Measures:

Corrective Action for Finding C was initiated January 10, 1980 and completed the same day.

Preventive measures were initiated through the training of March 17, 1980; the completion date will be May 16, 1980.

FINDING D

"Section D-QA-7 of the QA Manual, paragraph 8.4, states in part, 'A QC Inspector shall review the fit up and welding operations and perform the following inspections...'

- c. Record the welder's number
- d. Record the filler metal LCN

Contrary to the above, the welders number or filler metal LCN had not been recorded for a weld build up adjacent to weld joint A on Shop Fabrication Sheet No. 1017-017-14."

POWER PIPING RESPONSE

Actions Taken to Correct the Problem:

NCDR No. 652 was generated to correct the deficiency noted above. The non-documented weld area was removed by grinding; the cavity was examined by liquid penetrant test; and the area was re-welded using controlled filler material, an approved welding procedure and a qualified welder. All operations were verified and documented by Quality Control in accordance with Section D-QA-7 of the QA Manual.

Actions Taken to Prevent Recurrence:

The Inspection Section personnel were given additional training in the proper execution of their responsibilities in documenting and recording the required

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inspection. This training session was concurrent with the training session held to prevent recurrence of Finding A.

Date for Corrective Action and Preventive Measures:

The corrective action was initiated January 14, 1980 and completed February 25, 1980.

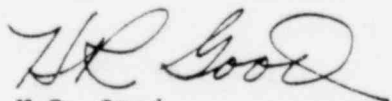
Preventive measures were initiated through the training session conducted January 29 and 30, 1980. Completion of the follow-up will be by March 28, 1980.

In addition to the above actions, we are conducting, as stated in our responses to Findings A, B and C, independent surveillances through the appropriate Section Supervisors of the individuals responsible for documenting these subject inspections to ascertain the effectiveness of the additional training.

We hope that the above responses are satisfactory and meet your needs as to the actions taken.

If there are any questions, or if further information is desired, please feel free to contact me.

Yours sincerely,
POWER PIPING COMPANY



H.R. Good
Corporate Director of Quality Assurance

HRG/paw