

400 Chestnut Street Tower II

December 9, 1980

Mr. James P. O'Reilly, Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Region II - Suite 3100
101 Marietta Street
Atlanta, Georgia 30303

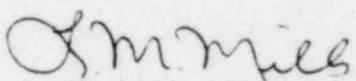
Dear Mr. O'Reilly:

Enclosed is our supplemental response to C. E. Murphy's October 17, 1980, letter, RII:EHG 50-260/80-28, concerning activities at Browns Ferry Nuclear Plant which appeared to be in noncompliance with NRC requirements.

The enclosure supplements the response submitted by my letter to you dated November 10, 1980. It provides a response to concerns of E. H. Girard of your staff as discussed by telephone with my staff on November 17, 1980, and documented in a letter from C. E. Murphy to H. G. Parris dated November 28, 1980. If you have any questions, please call Jim Domer at FTS 857-2014.

Very truly yours,

TENNESSEE VALLEY AUTHORITY


L. M. Mills, Manager
Nuclear Regulation and Safety

Enclosure

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ENCLOSURE

SUPPLEMENTAL INFORMATION
INSPECTION REPORT RII:EHG 50-260/80-28
BROWNS FERRY NUCLEAR PLANT

Question

Was this particular level II examiner given additional training in precleaning of welds as PT exam preparation? If so, what was the training?

RESPONSE

The level II examiner was given no additional training other than the experience gained from this examination. We believe that the procedural amplification, committed to in item 3 below, will provide sufficient additional instruction to prevent a recurrence.

Question

Why did the level II examiner proceed with the PT exam with paint and other foreign matter visible on the weld?

RESPONSE

As stated in our previous response, the TVA level II examiner had been in contact with the level III examiner and was told to proceed with an information test. The level II examiner proceeded with the PT test because he realized the weld would have to be redone in either case and wanted to look at the results over the whole area. The penetrant procedure (N-PT-1, revision 2) clearly states that paint and other foreign matter will be removed before the official liquid penetrant test. We believe our examiners are aware of this requirement.

Question

Your response dated November 10, 1980, stated that liquid penetrant procedure N-PT-1 is to be revised to address cleaning of ultrasonic couplant with demineralized water. Is TVA going to demonstrate that this revised procedure is acceptable or adequate by use of a precracked sample, suitable contaminated? If not, how will TVA be assured of the adequacy of the new procedure? Can NRC view such demonstration testing or verification?

RESPONSE

A liquid penetrant test has been performed to find out what additional steps would be necessary to perform a liquid penetrant examination after the application of Ultragel, an ultrasonic couplant, and obtain essentially the same results as if the couplant had not been applied first.

A liquid penetrant comparator block as defined in ASME Section V, Article 6, was used for the test. One side of the comparator block was prepared in accordance with N-PT-1, Revision 2. On the other side, Ultrigel was applied first. After letting couplant stay on for three to five minutes the excess couplant was removed with a dry rag, followed by a water-soaked rag. After wiping again with a dry rag, this side was also prepared as in accordance with the procedure requirements of N-PT-1, Revision 2. Clean lintfree white rags were used for the removal of the couplant.

The test results were essentially the same on both sides of the comparator block. Therefore, we conclude that a liquid penetrant examination can be satisfactorily performed after the application of Ultrigel if the couplant is removed with a water-soaked rag before the examination.

The verification was made before NRC's request to view the demonstration. However, photographs were made which will be available for NRC viewing. Optionally the demonstration may be repeated.