DUKE POWER COMPANY
POWER BUILDING
422 SOUTH CHURCH STREET, CHARLOTTE, N. C. 28242

WILLIAM O. PARKER, JR.
VICE PRESIDENT
STEAM PRODUCTION

October 9, 1980

TELEPHONE: AREA 704
373-4083

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

Subject: McGuire Nuclear Station
Docket No. 50-370

Reference: RII:TDG
50-370/80-12

Dear Mr. O'Reilly:

As requested by your letter of September 17, 1980, please find attached our response to the item of noncompliance identified in the subject inspection report.

Duke Power Company does not consider any information contained in IE Inspection Report No. 50-370/80-12 to be proprietary.

Very truly yours,

William O. Parker Jr. by WAH
William O. Parker, Jr.

GAC:scs
Attachment

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DUKE POWER COMPANY
MCGUIRE NUCLEAR STATION

Response to IE Inspection Report 50-370/80-12

ITEM

As required by 10CFR 50, Appendix B, Criterion IX, and implemented by Duke Power Company Topical Report Duke 1-A, Section 17, Paragraph 17.1.9, "Measures shall be established to assure that special processes including welding, heat treating, and nondestructive testing, are controlled and accomplished by qualified personnel using qualified procedures in accordance with applicable codes, standards, specifications, criteria, and other special requirements." ASME Boiler and Pressure Vessel Code is the applicable code for training and qualification program for visual examiners.

Contrary to the above, the training and qualification program for visual examiners does not comply with applicable requirements as follows:

1. The practical examination does not include sufficient checkpoints to verify examiner candidate proficiency.

2. The qualification records do not describe the test objects used in the practical exam.

3. The practical examination does not include test objects representative of the type to be examined in production.

4. Two major rejectable defects are not included in the training/qualification program.

5. The program does not include test specimens representing acceptable/unacceptable weld surface conditions.

6. Two completed welds did not meet the 3-1 slope requirements of ASME.

7. The device used to determine adequate lighting is not in accordance with ASME.

RESPONSE

1. Examiner candidates are required to demonstrate proficiency by use of process control from M-4A during practical exams. These forms, M-4A, contain more than 10 checkpoints.

2. Although the test specimens are not formally described in a written document, the test specimens are readily available for physical inspection. Such a description is not a strict requirement, but one of the guidelines set up in SNT-TC-1A. The word "representative" is used when referring to test specimens used in examinations and training.

3&4. McGuire does not presently have samples for testing purposes of socket weld and butt fitups. The same is true of oxidation and cracking samples. These samples will be developed and incorporated into our training program. These fitups are presently being taught using on the job training and practical work done in our weld test shop. These items are also included in the classroom training. Samples will be developed by November 15, 1980.

5. McGuire does not presently use test specimens for acceptable/unacceptable weld surface conditions in the training program except during practical exams. Samples or other suitable training aids will be developed by November 15, 1980.

6. The two welds in question, CA2FW-12-3 and RN2F 520, join heavy wall valves to schedule 40 piping. Valve 2CA8 was weld prepped to a normal 37 1/2° bevel with a secondary bevel of 45° on the thicker portion of the valve. Duke welders have overlapped the weld (CA2FW 12-3) onto the 45° secondary bevel. This overlapping actually decreases the weld slope and the slope falls within the code requirement of a minimum 3 to 1 taper. It is our position that this weld is acceptable.

   Weld RN2F 520 overlaps valve 2RV 69A. The valve has a 37 1/2° bevel at the weld prep with a 3 to 1 taper from the 37 1/2° weld bevel up onto the valve. Again the overlapping decreases the slope and falls within the code requirements of a minimum 3 to 1 taper. It is our position that this weld is acceptable.

7. Quality Assurance Procedure L-80 will be changed to agree with the wording in ASME Section V. This procedure change will be issued by November 15, 1980.