

Washington Public Power Supply System
A JOINT OPERATING AGENCY

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Nuclear Regulatory Commission
Region V
Suite 202, Walnut Creek Plaza
1990 N. California Boulevard
Walnut Creek, California 94596

February 3, 1981
G01-81-031

Attention: Mr. G. S. Spencer
Chief Reactor Construction
and Engineering Support Branch

Gentlemen:

Subject: WPPSS NUCLEAR PROJECTS NOS. 1/4
NRC INSPECTION - WNP-1/4
DATES OF INSPECTION - December 16 thru 19, 1980
DOCKET NOS. 50-460 and 50-513
CONSTRUCTION PERMIT NOS. CPPR-134 and -174

Reference: Letter from G. S. Spencer to R. L. Ferguson, NRC Inspection
at WNP-1/4 Site, dated January 8, 1981.

The referenced correspondence delineated the results of the December 16-19, 1980 inspection of activities authorized by NRC Construction Permits Nos. CPPR-134 and -174. Further, the referenced correspondence identified certain activities which were not conducted in full compliance with PSAR requirements set forth in the Notice of Violation enclosed as Appendix A. These items of noncompliance have been categorized into a level as described in Supplement II of the Federal Register dated October 7, 1980 (45 FR 66754) as the Interim Enforcement Policy.

This letter is submitted in response to the referenced correspondence. Per telecon with Mr. D. Kirsch on February 2, 1981 the due date for this response has been extended from February 1 to February 3, 1981. The specific finding(s), as identified, and the Supply System response is provided here-with as Appendix A.

Very truly yours,


D. W. Mazur
WNP-1/4 Program Director

pm
Enclosures

cc: JR Lewis - Bonneville Power Administration
CR Bryant - Bonneville Power Administration
V. Mani - United Engineers & Constructors, Inc.
V. Stello - Director of Inspection and Enforcement-NRC

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81-13



Nuclear Regulatory Commission
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Suite 202, Walnut Creek Plaza
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Docket No. 50-460
Construction Permit No. CPPR-134

APPENDIX A

Finding A

As a result of the inspection conducted during the period December 16-19, 1980 and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

- A. 10 CFR 50, Appendix A, Criterion V, as implemented by Section 17.1.5 of the quality assurance program documented in the PSAR and the WPPSS QA Program Manual Procedure QAP-2, Paragraph 3.1, states, in part, that "Activities affecting quality shall be prescribed by documented instructions, procedures or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures or drawings..."

Section 1A, paragraph 11.2, of WPPSS quality class 1 nuclear-safety-related contract specification nos. 9779-23, 41, 62 and 113 states in part that "All contractor's drawings submitted shall be posted with the WPPSS Quality Class as designated in these documents and as called for on the Engineer's design drawings."

Contrary to the above requirement, as of December 17, 1980, (1) four contractor drawings for specification 9779-23; (2) five contractor drawings for specification no. 9779-41; (3) three contractor drawings for specification no. 9779-62; and (4) six contractor drawings for specification no. 9779-113 were not posted with the WPPSS quality class, as designated.

This is a repeat severity level IV violation (Supplement II of Federal Register Notice 45 FR 66754, dated October 7, 1980).

Supply System Response

Corrective Action Taken and Results Achieved

- A. Corrective Action Request Number CAR- H.O.-23 (Attachment 1) was issued to project engineering on the nonconforming condition of vendor drawings not referencing the WPPSS Quality Class as required by the specifications.

In order to determine the extent of this nonconforming condition, project engineering and project QA sampled vendor drawings on many pre-purchased and site contracts. The results are summarized in Attachment #2. These results indicate that the majority of the pre-purchased vendors are not complying with the subject requirement and that the majority of the site contractors are complying. There are some exceptions to this statement as can be seen from the attachment.

The intent of the specification requirement to note the WPPSS quality class on vendor drawings was to assure that when a vendor translates project design drawings into his own installation or fabrication drawings, the quality class is maintained. This primarily affects site contractors, who generally prepare working drawings from project design drawings. Manufacturers of equipment (off-site vendors) typically submit their own product drawings responsive to project specifications. Vendors control quality level by their own standard design controls and shop controls, such as indicating of code class, nuclear safety class, class 1E, etc. on the drawings or other controlling documents such as shop orders, travellers, etc. Therefore, imposing a requirement to add a specific WPPSS designation on manufacturer's drawings does not add any value to their control. The exception to this are those off-site vendors who translate project design drawings into subdrawings. These are:

- o The vendors for piping sub assemblies
(9779-123, 137 & 151)
- o The vendor for structural steel
(9779-207)

Based on the above, the requirement to place the WPPSS quality class on drawings will be deleted on all pre-purchased contracts except (9779-123, 137, 151 & 207). Those site contractors identified in Attachment #2 as not in full compliance will be required to correct any non-complying drawings. Corrective Actions Requests 1-CAR-216-03, 1-CAR-246-10 and 1-CAR-259-05 (Attachments #3, 4, & 5 respectively) have been initiated to obtain the required corrective action. Contract 9779-204 (Stainless Steel Liners) currently does not include this requirement but need not be revised, since all the work is quality class I.

Recognizing that this is a repeat violation, we have investigated the apparent breakdown in the implementation of our original corrective action to ascertain the cause of the continued deficiency.

As it turns out the problem is with the fact that we failed to adequately address which organization maintained responsibility for the site generated drawings versus pre-purchased vendor documents. In keeping with this on May 4, 1979 an interoffice memorandum was transmitted to Field Project Engineering from the Field Project Engineering Manager stressing the need to verify the WPPSS Quality Class designation on the contractors' documentation. However, in doing so we neglected to close the loop with UE&C Engineering- Philadelphia, concerning the pre-purchased documentation. This was an oversight on the projects part; however, through site surveillances and the aforementioned corrective action requests, we have corrected the problem. In light of the confusion regarding this situation, all such future deficiencies associated with pre-purchased items will be discussed in detail with the UE&C Home Office.

Action Taken to Preclude Recurrence

After the specification revisions have been issued the pre-purchased contractors with the few stated exceptions will no longer be required to reference the WPPSS quality class on their drawings.

Action Taken to Preclude Recurrence (Cont'd)

Satisfactory implementation and re-inspection of all stated corrective actions will result in acceptable drawings.

Date of Full Compliance

It is anticipated that full compliance will be achieved by March 1, 1981.

Finding B

- B. 10 CFR 50, Appendix B, Criterion V, as implemented by Section 17.1.5 of the quality assurance program documented in the PSAR and the WPPSS QA Program Manual Procedure QAP-2, Paragraph 3.1 states, in part, that "Activities affecting quality shall be prescribed by documented instructions procedures and drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures or drawings..."

Drawing no. 9779-LL-417652 for support no. CCW-54-SG-106, a WPPSS Quality Class 1, ASME III, Subsection NF Class 3 support in Section A-A depicts the shop welding configuration for the upper beam to wall attachment plate joint.

Contrary to the above, as of December 18, 1980, the as installed shop weld configuration for the upper beam to wall attachment plate joint did not conform to that specified by the drawing in that the joint configuration was rotated 180° from drawing orientation requirement. The support was inspected and accepted by the material supplier on April 24, 1979.

This is a severity level IV violation (Supplement II of Federal Register Notice 45 FR 66754, dated October 7, 1980).

Supply System Response

- B. An inspection of a larger population (66 supports) of hanger supports has been performed by WPPSS/UE&C QA personnel to ascertain whether or not the subject condition could be considered an isolated case. The inspection revealed that another three (3) supports exhibited similar type joint orientation deficiencies.

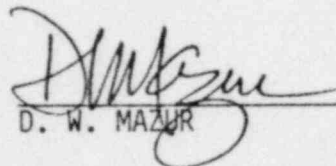
The additional findings are presently being evaluated by UE&C Engineering to determine the extent of required corrective actions. These findings have been documented on WPPSS/UE&C Nonconformance Report 1-NCR-123-044.

A thorough corrective action plan indicating the status of the as found conditions, corrective actions to prevent recurrence and what reinspection actions may be required for the installed supports will be completed by March 2, 1981. Therefore, to provide a more comprehensive report we request a thirty day (3) extension for this response.

STATE OF WASHINGTON)
COUNTY OF BENTON)

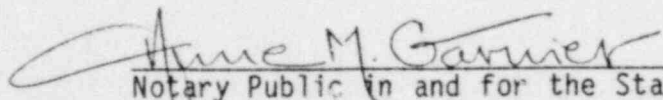
D. W. MAZUR, Being first duly sworn, deposes and says: That he is the Program Director, WNP-1/4, for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that he is authorized to submit the foregoing on behalf of said applicant; that he has read the foregoing and knows the contents thereof; and believes the same to be true to the best of his knowledge.

DATED 2/3, 1981


D. W. MAZUR

On this day personally appeared before me D. W. MAZUR to me known to be the individual who executed the foregoing instrument and acknowledged that he signed the same as his free act and deed for the uses and purposes therein mentioned.

GIVEN under my hand and seal this 3rd day of February, 1981


Notary Public in and for the State
of Washington
Residing at Benton County

H.O. NO. 23
SITE NO. _____
DATE 12/30/80

ATTACHMENT I
CORRECTIVE ACTION REQUEST
WPPSS NUCLEAR PROJECTS

PAGE 1 OF 3

TO (Addressee): V. Mani Project Engineering Manager	<input type="checkbox"/> NONCONFORMING MATERIAL NCR _____
FROM: G. Faust Project QAE (Field)	<input checked="" type="checkbox"/> DISCREPANCY IN PROCESS <input type="checkbox"/> QUALITY ASSURANCE AUDIT <input type="checkbox"/> OTHER _____

THE ADVERSE CONDITION DESCRIBED BELOW REQUIRES IMMEDIATE CORRECTIVE ACTION. PLEASE INDICATE THE CAUSE AND CORRECTIVE ACTION TO BE TAKEN IN SPACE (B) BELOW, INCLUDING THE IMPLEMENTATION DATE. SIGN AND DATE THE CORRECTIVE ACTION STATEMENT AND RETURN THIS FORM TO THE SENDER BY 01/19/81

A DESCRIPTION OF DISCREPANT CONDITION:

Reference Attachment No. 1

RECOMMEND CORRECTIVE ACTION:

SIGNATURE G. Faust
POAM OR PROJECT QAE

B CORRECTIVE ACTION:

CAUSE AND ACTION TO BE TAKEN TO PREVENT RECURRENCE

CORRECTIVE ACTION WILL BE IMPLEMENTED BY _____ SIGNATURE _____ DATE _____ (ADDRESSEE) _____ DATE _____

C CONCURRENCE: ACCEPT/REJECT
COMMENTS
POAM OR PROJECT QAE _____ DATE _____

D ACTION VERIFIED: ACCEPT/REJECT
COMMENTS
POAM OR PROJECT QAE _____ DATE _____

Attachment 1A. Description of Discrepant Condition

During the NRC Inspection of 02/12/79, an "item of noncompliance" was identified as follows:

Item of Noncompliance

Specification 9779-53, "Diesel Generators," in Paragraph 11.2, states that "All contractor's drawings submitted shall be posted with the WPPSS quality class as designated in these documents and as called for on the engineer's design drawings. Specification 9779-53 was defined as Quality Class I.

Contrary to the above, on February 14, 1979, ten contractor drawings furnished for installation of the diesel generators at WNP Units 1 and 4 were not posted with the WPPSS quality class designation. These drawings were located in the UE&C drawing control files.

The supply systems' response to this finding was as follows:

Action Taken to Correct the Identified Item

The contractor has been advised that the majority of drawings submitted for the Diesel Generator do not indicate the WPPSS Quality Class as stipulated in Section 1A of Specification 9779-53. The contractor has been requested to resubmit those drawings which do not indicate the WPPSS Quality Class.

The Quality Class for the Diesel Generator is WPPSS Quality Class I.

Action Taken to Preclude Recurrence

The Field Project Engineering Manager on May 4, 1979 issued a directive to Field Project Engineers and Design Supervisors which requires a verification as to proper Quality Class of documents prior to issue. The directive also stated the importance of the WPPSS Quality Class to correctly note proper identification of equipment with respect to safety and operation of the Unit.

Date of Full Compliance

Full compliance achieved May 4, 1979.

The NRC performed a verification of corrective action to this item of non-compliance during their inspection the week of 12/15-12/19/80. This verification confirmed that the committed corrective action had been implemented. However, a random review of drawings on contracts 9779-23, 9779-41B, 9779-41G, 9779-62 and 9779-113 by the NRC indicated that a similar condition exists on those contracts. The NRC concluded that the corrective action taken was ineffective and inadequate and stated that a repeat finding would be issued.

Recommended Corrective Action

1. Review and evaluate vendor drawings to determine the extent of the nonconforming condition.
2. Provide a response indicating corrective action to be taken and include as a minimum:
 - a. Corrective action taken and results achieved.
 - b. Corrective action to preclude recurrence.
 - c. Date of full compliance.

Con Contract No.	Description	WFPSS Quality Class Included
18	Atmos. cleanup trains	Partial
22	Fans & air handling units	Yes
23	Emerg. shutdown service	Partial
	water pumps	No
24A	Shop fab. tanks	No
26	Heat exchangers	No
273	Rad. waste nuclear air compressors	No
31	Overhead traveling cranes	No
35	ASME nuclear pumps	No
39A	Non-safety related chilled water and sump pumps	Partial
39B	ASME III class 3 pumps	Yes
41BD	ASME III valves	Yes
41EF	ASME III valves	Yes
41H	ASME III valves	Partial
42A	Pneum. act. valves	Partial
42B	Pneum. act. valves	No
42C	Pneum. act. valves	Partial
42E	Pneum. act. valves	No
42F	Pneum. act. valves	No
47	5615KV switchgear	No
48	480V motor control centers	No
51	Batteries, chargers	Partial
55	Elect. penetrations	Partial
58	Local instr. racks	No
62	Pumps	No
68	Cont. iso. valves	Partial
72	Compressor-condensing units	Yes
74	Evaporative cooler units	No
76A	Filters	No
91	Misc. safety & relief valves	No
100	D.C. switchgear	Partial
101	Distribution panels	No
105	600V power & control cable	No
106	Instr. & special wire	No
113	Emergency power sequencing S/S	No
121	Rad. monitoring system	Partial
130C	Instrumentation	No
130L	Tank level instr.	No
130I	Flow elements	Yes
131B	Transmitters	No
131Z	Pressure switches	Yes
131H	Thermal elements	Partial
132	Flow elements	Yes
137	Shop Fab. piping	No
140	Missile shield	No
144	Hydrogen recombiners	No
152	Elect. panels	No

(cont'd)

(4)

<u>Contract No.</u>	<u>Description</u>	<u>WPPSS Quality Class Included</u>
154	ASME III piping specialties	No
155	Valves	Partial
204	Stainless steel liners	No
207	Structural steel	Yes
211	WSSS piping & equip. install.	Yes
213	Equip. hatch & personnel locks	Yes
216	Hual installation	Partial
218	Electrical installation	Yes
219	Painting	N/A No drawings req'd.
246	Underground piping	Partial
249	Field coatings	N/A No drawings req'd.
252	Spray pond pump house	Yes
253	Main steam iso. bldg.	Yes
254	GSB superstructure	Yes
257	Piping & mech. installation	Yes
259	Major rigging	No

H.O. NO. _____
SITE NO. 1-CAR-216-03
DATE 1/30/81CORRECTIVE ACTION REQUEST
WPPSS NUCLEAR PROJECTS☒ WNP-1
☒ WNP-4PAGE 1 OF 1

TO (Addressee): University Mechanical Attention: Don Larsen, QA Manager	<input type="checkbox"/> NONCONFORMING MATERIAL NCR _____
FROM: T. J. Houchins Project QA Manager	<input type="checkbox"/> DISCREPANCY IN PROCESS
	<input type="checkbox"/> QUALITY ASSURANCE AUDIT
	<input checked="" type="checkbox"/> OTHER <u>Spec. Requirement</u>

THE ADVERSE CONDITION DESCRIBED BELOW REQUIRES IMMEDIATE CORRECTIVE ACTION. PLEASE INDICATE THE CAUSE AND CORRECTIVE ACTION TO BE TAKEN IN SPACE (B) BELOW, INCLUDING THE IMPLEMENTATION DATE. SIGN AND DATE THE CORRECTIVE ACTION STATEMENT AND RETURN THIS FORM TO THE SENDER BY 02/09/81

A DESCRIPTION OF DISCREPANT CONDITION:

Paragraph 25.2 of Section 1A of specification 9779.216 requires that all contractor drawings submitted shall be posted with the WPPSS Quality Class. Contrary to this requirement, a review of contractor drawings submitted to date indicates many of your drawings do not meet this requirement.

RECOMMEND CORRECTIVE ACTION:

Immediately review the latest revision of all drawings submitted to the Engineer to assess compliance with the above requirement. Update and resubmit drawings as required.

SIGNATURE M.E. Rod L. T.J.H.
POAM OR PROJECT QAE

B CORRECTIVE ACTION:

CAUSE AND ACTION TO BE TAKEN TO PREVENT RECURRENCE

CORRECTIVE ACTION
WILL BE IMPLEMENTED BY _____

SIGNATURE _____

DATE _____

(ADDRESSEE) _____

DATE _____

C CONCURRENCE: ACCEPT/REJECT

COMMENTS

POAM OR PROJECT QAE _____

DATE _____

D ACTION VERIFIED: ACCEPT/REJECT

COMMENTS

POAM OR PROJECT QAE _____

DATE _____

☒ WNP-1
☒ WNP-4

PAGE 1 OF 1

DAIS-11/78

H.O. NO. _____
SITE NO. 1-CAR-259-05
DATE 1/30/81CORRECTIVE ACTION REQUEST
WPPSS NUCLEAR PROJECTS☒ WNP-1
☒ WNP-4PAGE 1 OF 1

TO (Addressee):

Lampson
Attention: Bob Knight, Project Manager

FROM:

T. J. Houchins, Project QA Manager

- ☐
- NONCONFORMING MATERIAL
-
- NCR _____
-
- ☐
- DISCREPANCY IN PROCESS
-
- ☐
- QUALITY ASSURANCE AUDIT
-
- ☒
- OTHER
- Spec. Requirement

THE ADVERSE CONDITION DESCRIBED BELOW REQUIRES IMMEDIATE CORRECTIVE ACTION. PLEASE INDICATE THE CAUSE AND CORRECTIVE ACTION TO BE TAKEN IN SPACE (B) BELOW, INCLUDING THE IMPLEMENTATION DATE. SIGN AND DATE THE CORRECTIVE ACTION STATEMENT AND RETURN THIS FORM TO THE SENDER BY 02/09/81

A DESCRIPTION OF DISCREPANT CONDITION:

Paragraph 25.2 of Section 1A of specification 9779.259 requires that all contractor drawings submitted shall be posted with the WPPSS Quality Class. Contrary to this requirement, a review of contractor drawings submitted to date indicates many of your drawings do not meet this requirement.

RECOMMEND CORRECTIVE ACTION:

Immediately review the latest revision of all drawings submitted to the Engineer to assess compliance with the above requirement. Update and resubmit drawings as required.

SIGNATURE M.E. Radwin Jr. T.J.H.
POAM OR PROJECT QAE

B CORRECTIVE ACTION:

CAUSE AND ACTION TO BE TAKEN TO PREVENT RECURRENCE

CORRECTIVE ACTION

WILL BE IMPLEMENTED BY _____

SIGNATURE _____

DATE _____

(ADDRESSEE)

DATE _____

C CONCURRENCE: ACCEPT/REJECT

COMMENTS

POAM OR PROJECT QAE _____

DATE _____

D ACTION VERIFIED: ACCEPT/REJECT

COMMENTS

POAM OR PROJECT QAE _____

DATE _____