APPENDIX A

NOTICE OF VIOLATION

Washington Public Power Supply System
P. O. Box 1223
Elma, Washington 98541

Docket Nos. 50-508, 50-509
Construction Permit Nos. CPPR-154, CPPR-155

As a result of the inspection conducted on May 4 to June 2, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

A. 10 CFR 50, Appendix B, Criterion IX, states, in part, that: "...Special processes, including welding...are controlled and accomplished...using qualified procedures...in accordance with applicable codes, standards, specifications, criteria, and other special requirements."

Paragraph 17.1.9 of the Quality Assurance Program documented in approved PSAR Deviation No. 26-WP states, in part, that: "The WPPSS QA Program requires...development and implementation of measures for the control of special processes...such processes as...welding..." and that..."Equipment utilized in the performance...of special processes that require qualification shall be qualified to its intended usage prior to being used..."

The ASME Boiler and Pressure Vessel Code Sections III and IX provide requirements for qualifying welding procedures for use on ASME Section III, Class 2 welded connections. For materials requiring impact testing, (notch toughness) additional requirements are specified by Section III, Subsection NC-4332 and Section IX paragraph QW-251.2 and includes the following statement; "Essential Variables are those in which a change...is considered to effect the mechanical properties of the weldment, and shall require requalification of the WPS. Supplementary Essential Variables are required for metals for which other section of the Code specify notch-toughness tests." The notch toughness requirement for the containment penetration assemblies are specified in WPPSS Specification 3240-54, paragraph 13.07, in accordance with Section III, Subsection NC-2311 of the Code. The supplemental requirements for welding materials requiring impact testing include: (QW-403.4) "...when joints are to be made between base metals from two different groups, a procedure qualification must be made for the applicable combination of base metals;" (QW-406.3) requalification is required for"...an increase in the Specified Maximum interpass temperature...". (QW-409.1) requalification is required for "...a change in the ranges of amperage, voltage, or travel speed..."

The Peter Kiewit Sons Co. (contract 3240-251) welding procedure for joining Safety Injection System 40" penetration assemblies No. 23 and 24 (welds number 5) is procedure PKS-WPS-8s. The joints involve the welding of a P-1,Group 1 material to a P-1, Group 2 notch toughness tested material. As shown on Ebasco drawing No. 3240-G-1300, Reactor Building Piping Penetrations, this is an ASME Section III, Class 2 weld.

Contrary to the above requirements on May 29, 1981, welding procedure PKS-WPS-8s, had been specified for use on welding penetration assemblies Nos. 23 and 24 and had been used on Unit 3 assembly No. 24, weld No. 5, without proper qualification. The procedure was not qualified for the two different base metal groups involved in the weld; no maximum interpass temperature was specified in the welding procedure; and the procedure allowed welding amperages in excess of that qualified (i.e. PKS-WPS-8s allows welding of 1/8 inch E7018 filler material at amperages up to 200 amps, whereas the procedure was qualified, by PQR's No. 3 and 8, with amperages of 125 amps and 180 amps).

This is a Severity level IV violation (Supplement II), applicable to Unit 3.

B. 10 CFR 50, Appendix B, Criterion III, states, in part, that: "Measures shall be established to assure that applicable regulatory requirements and the design basis...are correctly translated into...drawings..."

Paragraph 17.1.3 of the Quality Assurance Program documented in approved PSAR Deviation No. 26-WP, states, in part, that: "...prior to submittal" (of design document)" to either WPPSS or Ebasco for review and/or approval, the design contractor's, including Ebasco, are responsible for verifying that the design meets the requirements of the specification..."

The PSAR, Section 3.2, provides for safety-related ASME pipe supports to be designed in accordance with the ASME Boiler and Pressure Vessel Code, Section III. Section III Appendix XVII, paragraph 2452.1 specifies the minimum allowable fillet weld sizes for various thicknesses of welded connections on pipe supports.

Contrary to the above requirements, on May 29, 1981 it was determined that contractor design drawings for ASME safety related pipe supports No. 3G-CH-135, (one weld), 3G-CH-163 (two welds), and 3G-CH-267 (one weld) specified welds smaller than the minimum size permitted by the ASME Code Section III, Appendix XVII, paragraph 2452-1.

This is a Severity V violation (Supplement II), applicable to Units 3 and 5.

Pursuant to the provisions of 10 CFR 2.201, Washington Public Power Supply System is hereby required to submit to this office within thirty days of the date of this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further items of noncompliance; and (3) the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation. Consideration may be given to extending your response for good cause shown.

"The responses directed by this Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511."

JUL 2 1981

Dated

T. W. Bishop
Senior Resident Inspector