

Washington Public Power Supply System

Box 1223 Elma, Washington 98541 (206) 482-4428

Docket No. 50-508

July 29, 1983
G03-83-600

U. S. Nuclear Regulatory Commission, Region V
Office of Inspection and Enforcement
1450 Maria Lane, Suite 260
Walnut Creek, California 94596-5368

Attention: Mr. D. M. Sternberg, Chief
Reactor Projects Branch No. 1

Subject: NRC INSPECTION AT WNP-3
DEVIATION 50-508/83-03/01
FAILURE TO MEET AWS D1.1 WELD JOINT REQUIREMENTS

Reference: 1) Letter, G03-83-390, Docket No. 50-508, R. S. Leddick
to D. M. Sternberg, same subject, dated May 10, 1983.
2) NRC Letter, Docket 50-508, D. M. Sternberg to R. S.
Leddick, NRC Inspection at Washington Nuclear Project
No. 3 (WNP-3), dated April 8, 1983.

Reference 1) reported that Ebasco's response to the Supply System for the subject Deviation identified in Reference 2), was limited to the concern with AWS D1.1 and did not address the generic issue of deviations to FSAR commitments. As a result, the Supply System has developed a position regarding deviations to FSAR commitments and has directed Ebasco to develop and implement a program governing these deviations. The Supply System position and resultant program are discussed in the attached report which details corrective/preventive measures taken to resolve the problem.

Should you have any questions or desire further information, please contact me directly.



D. E. Dobson (760)
Acting Program Director, WNP-3/5

JAV:nj

Attachment

cc: J. Adams - NESCO
D. Smithpeter - BPA
Ebasco - New York
WNP-3 Files - Richland
R. D. Hill - Puget Sound Power & Light Company
P. Inman - Washington Water Power Company
B. D. Withers - Portland General Electric Company
L. D. Weislogel - Pacific Power & Light Company

8308150057 830808
PDR ADOCK 05000508
PDR

Attachment to: Letter, G03-83-600, dated July 29, 1983

Deviation (83-03/01)

The WNP-3 Final Safety Analysis Report, Section 3.8.3.2.1(c) specified that the design, fabrication, erection and inspection and testing of the steel internal structures of the pipe rupture restraints complies with the AWS Structural Welding Code D1.1-79.

The AWS Structural Welding Code D1.1-79, Paragraph 2.6.2 states that:

"Joint details may depart from the details prescribed in 2.9 and 2.10 and in 10.13 only if the contractor submits to the Engineer his proposed joints and joint welding procedures and at his own expense demonstrates their adequacy in accordance with the requirements of 5.2 of this code and their conformance with applicable provisions of Sections 3 and 4."

Paragraph 5.2 states that:

"Except for the procedures exempted in 5.1, joint welding procedures which are to be employed in executing contract work under this code shall be qualified prior to use, to the satisfaction of the Engineer, by tests as prescribed in Part B of this section."

Contrary to the above requirements, a weld joint which does not meet the AWS D1.1 prequalified joint details of Sections 2.9 and 2.10 was authorized for use, by Project Change Proposal No. 35Q-14386, on upper main steam pipe rupture restraints without prior qualification in accordance with Paragraph 5.2.

Corrective/Preventive Steps Taken

The following actions were taken to resolve concerns regarding exceptions to AWS D1.1 requirements:

- 1) A change to the FSAR, which indicates that exceptions considered necessary and technically acceptable by the engineer may be made to AWS D1.1 requirements and that such changes will be identified for retrievability, has been approved and will be included in the next FSAR Amendment.
- 2) Appropriate PCPs have been reviewed by ESSE to identify those that authorize deviations to AWS D1.1 requirements. To assure retrievability is maintained, a listing of PCPs that authorize AWS D1.1 deviations has been compiled.
- 3) To preclude recurrence, the procedure that governs the initiation and processing of PCPs was revised to require marking all PCPs which identify changes that take exception to SAR commitments and the documented SAR authorization to deviate from those commitments. These PCPs will be reviewed to determine if SAR changes are required.

Corrective Steps Planned

The following action addresses the generic issue of deviations to FSAR commitments:

Based on the position that all deviations to FSAR commitments must be identified, reviewed, documented and retrievable, the Supply System directed Ebasco to implement a program that will address these concerns.

Date When Corrective Action Will Be Completed

Due to the construction delay and fiscal restraints, a detailed program has not been formulated. We will provide you with a status update prior to restart of construction.