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October 21, 1981

Mr. Uldis Potapovs, Chief
Vendor Inspection Branch
United States Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Ref: Inspection Report No. 99900047/81-01

SUBJECT: Supplementary Response to USNRC Audit

The following is in response to your letter of October 6, 1981, requesting additional information.

The weld material/welder log (WM/WL) was implemented to monitor the length of time that electrodes are out of the holding oven. This log identifies the welder, material issued, and the time that the rods are out of the oven. The WM/WL does not reflect where the welder welded and is not intended for that purpose.

The QC Weld Log (QCWL) is used to document welding of pressure boundary items (ASME Code Components) only. This log is not utilized and is not required for non-pressure boundary welding such as internals, jigs, fixtures, etc. Therefore, welding materials may be issued to a welder and the welding operation is not required to be documented on a QC Weld Log.

Specifically in response to the reference letter, Item A:

1) Welders JA and BL performed weld repairs to the NEGT 1776 channel head I.D. in which both welders utilized 1/8" and 3/32" weld electrode. This is documented on the QC Weld Log for MRR 1068A. For safety reasons, i.e., ventilation in an enclosed space such as the channel head, two welders were assigned to perform this repair and they utilized the weld rod issued to each. All W Tampa Plant and Code requirements were satisfied in that each welder and the welding materials utilized are documented on the QCWL.

2) The QCWL for GAGT 1883, "Z" Seam, indicates that welder FG utilized T08994, 5/32" 7018 electrode. This was a normal entry and no changes were required to the QCWL. The 9018, 5/32" electrode was not utilized for pressure boundary welding. Please note that welders can be assigned to more than one work area during their shift. If this reassignment is for pressure boundary welding, the QC Technicians are notified by the Manufacturing Supervisors. This is in addition to the normal surveillance of welding operations performed and documented by the QC Technicians.

3) Welder HN utilized 5/32" Inconel electrode, T10787, in performing manual weld clad repairs to Shop Order GAGT 1882, A/I "B". This is a normal entry and no changes were required to the QCWL. The T07979 material was not utilized by welder HN for pressure boundary welding.

4) The applicable QCWL reflects that welder SD performed automatic welding on Shop Order GAGT 1881 closure seam. The T10782 material was not utilized for product pressure boundary welding.

The above cited examples attempt to correlate the weld material/welder log to the Quality Control Weld Log. Each of these logs have an independent purpose and are not intended and, in fact, cannot be traced on a one-to-one basis. Please note that in Item A, (1) above, each welder was issued a different size and test number electrode. However, when the welders utilized each, the QC Weld Log documented this. Also, when a welder is reassigned to a pressure boundary welding operation, the Manufacturing Supervisor notifies the QC Technician. It is our experience that this notification is properly made and appropriate QC Weld Logs are generated. Again, this is in addition to the normal welding surveillance performed by the QC Technicians.

All documentation is on file for your review.

We believe that we are in compliance with all W Tampa Plant and Code requirements in documenting weld operations.

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cc: J. P. Mortara, R. H. Dunn, W Tampa Plant