



Carolina Power & Light Company

USNRC REGION II
ATLANTA, GEORGIA

March 25, 1982

62 APR 12 AID : 40

Mr. James P. O'Reilly
United States Nuclear Regulatory Commission
Region II
101 Marietta Street, Northwest
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

In reference to your letter of February 23, 1982, referring to RII:
JLC 50-400/401/82-01, the attached is Carolina Power & Light Company's
reply to the deficiencies identified in Appendix A.

It is considered that the corrective and preventive actions taken will
be satisfactory for resolution of these items, once completed.

Thank you for your consideration in this matter.

Yours very truly,

H. R. Banks
Manager
Corporate Quality Assurance

NJC:jp

Attachment

cc: Mr. J. A. Jones

Sworn to and subscribed before me
this 25th day of March, 1982.

Notary Public

My commission expires:

12/7/86
Date

8205040183

Severity Level VI and V Violation

- A. 10 CFR 50, Appendix B, Criterion V as implemented by PSAR paragraph 1.8.5.5 requires that activities affecting quality be prescribed by documented procedures and accomplished in accordance with these procedures. Carolina Power and Light Company (CP&L) Welding Procedure Specification No. 8B2 Revision 5, requires that the orifice or gas cup size be from a size 4 through size 8.

Contrary to the above, on January 20, 1982, activities affecting quality were not being accomplished in accordance with documented procedures in that three welders were observed welding on reactor coolant loop piping weld joint Nos. RC-1-FW-7 and RC-1-FW-6 using WPS 8B2 but using size 10 gas cups.

- B. 10 CFR 50, Appendix B, Criterion V, as implemented by PSAR paragraph 1.8.5.5 requires that activities affecting quality be prescribed by documented procedures/instructions and accomplished in accordance with these procedures/instructions. CP&L Field Change Request/Permanent Waiver No. FCR/H-564 states that: "The deletion of welds applies only to box frame design used for pipes that are 12 inches and smaller." CP&L's procedure NDEP-601, Visual Examination of Welds, paragraph 9.11 requires that: "Welds and adjacent base metal shall be free of visible arc strikes, weld spatter and mis-handling marks." In addition, Section 19, paragraph 19.9 of CP&L's Quality Assurance Program for Radioactive Waste Management Systems states that: "measures shall be established to assure that conditions adverse to quality such as...deficiencies are promptly identified and corrected."

Contrary to the above, on January 20, 1982, activities affecting quality were not being accomplished in accordance with documented procedures/instructions in that:

- (1) Welds were deleted on box frame design hanger CC-H-469, which held pipes that were 18 inches in diameter.
- (2) Field pipe welds FW-3708, FW-3702, and FW-3697 had small arc strikes on the base metal adjacent to the field welds.
- (3) Vendor welds below FW-3708, FW-3702, and FW-3697 had adjacent arc strikes and weld spatter that had not been reported by the weld inspector.

-continued-

Denial or Admission and Reasons for Violation:

A. The violation did exist as stated. The welders involved misunderstood the nonessential variable procedure requirements for W.P.S. 8B2 which limited the gas cup size to numbers 4-8. The welders were aware that, for some automatic procedures being used on the Reactor Loop Piping, cup size requirements ranged from number 4-12 and this led to the confusion of the requirements for W.P.S. 8B2.

B. (1) The violation did exist as stated. The welder incorrectly thought that FCR-H-564 applied to the inside window welds regardless of the pipe size. Since this FCR applies to pipes 12" diameter and less, it was not appropriate to delete the inside welds.

The QA/QC supervisor incorrectly informed the inspector that FCR-H-564 was applicable to hanger CC-H-469. The inspector failed to note that the hanger was for 18" pipe.

(2) The violation is correct as stated. The Welding Inspector overlooked the identified deficiencies.

(3) The violation is correct as stated. The Welding Inspector failed to identify and report the deficiencies because he did not see them.

Corrective Steps Taken and Results Achieved:

A. Nonconformance Report W-273 was issued for control and resolution of the violation. On January 22, 1982, all welders working on Reactor Loop Pipe were instructed by a CP&L Welding Engineer on procedure requirements for cup size and how to determine gas cup size. On January 25, 1982, welder training classes were conducted in which one of the topics discussed was Welding Procedure Specification (WPS) requirements for GTAW Gas Cup Size. Welder's now have a better understanding of welding specification requirements for gas cup size.

Each of the joints (RC1-FW7 & RC1-FW6) have been radiographically examined and dye penetrant tested and found acceptable.

B. (1) Deficiency and Disposition Report 801 was issued on January 22, 1982, for control and resolution of the violation. The hanger was evaluated with the missing welds and found to be acceptable as is.

(2) Nonconformance Report W-324 was issued for control and resolution of the deficiency pending completion of corrective action. All pipe welds inspected by the Welding Inspector responsible for inspecting the identified field welds are in the process of being reinspected. Reinspection will be completed by May 1, 1982.

(3) Deficiency and Disposition Report 866 was issued for control and resolution of the deficiency pending completion of corrective action and preventive measures.

Corrective Steps Taken to Avoid Further Noncompliance:

- A. The training class conducted on January 25, 1982 was originated to instruct welders of procedure requirements to prevent future such incidents. New welder indoctrination has been expanded to ensure that a welder knows how to find the gas cup size on the WPS.
- B. (1) The welder was questioned as to why he omitted the inside window welds. He was under the impression that FCR-H-564 allowed the welds to be deleted regardless of pipe size. He was reinstructed in the requirement that the pipe must be 12" or smaller in diameter for this FCR to be applied. A memorandum was also sent to the Hanger Superintendent to reiterate the requirements of FCR-H-564.

The welding QA/QC supervisor was instructed to ensure that referenced FCR's are reviewed for applicability prior to releasing to the inspectors.

- (2) The Welding Inspector responsible for the inspection of the welds in question was removed from pipe weld inspection pending reinstruction and satisfactory demonstration of proficiency. All Welding Inspectors have been issued pocket card checklists for use in inspecting welds.
- (3) The Welding Inspector responsible for inspection of the welds in question has been removed from pipe weld inspection pending retraining and satisfactory demonstration of proficiency. All welding inspectors have been instructed to be alert to deficiencies adjacent to the field welds they inspect, with particular attention given to Vendor welds.

CP&L has implemented a statistical sampling receipt inspection of those items received with source inspection quality releases in order to minimize the occasions in which deficient items fabricated by Vendors might be released to the field.

Date When Full Compliance Will Be Achieved:

- A. Full Compliance is considered to have been achieved on January 25, 1982.
- B. (1) Full compliance is considered to have been achieved on February 1, 1982.
- (2) Full compliance will be achieved by May 1, 1982.
- (3) Full compliance will be achieved by May 1, 1982.