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Dalwyn R. Davidson
VICE PRESIDENT
SYSTEM ENGINEERING AND CONSTRUCTION

May 28, 1982

Mr. James G. Keppler
Regional Administrator, Region III
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

RE: Perry Nuclear Power Plant
Docket Nos. 50-440; 50-441
Interim Report on Cable Tray
and Conduit Support Welding
Deficiencies [RDC 56(82)]

Dear Mr. Keppler:

This letter will serve as the interim report pursuant to 10CFR50,55(e) concerning defective welds for cable tray and conduit supports. On April 30, 1982, Mr. E. Riley of The Cleveland Electric Illuminating Company notified Mr. H. Wescott of your office that this problem was being evaluated.

This report contains a description of the deficiency, the background information, and the corrective action, including the evaluation currently being undertaken to determine the extent of the problem and the planned date for filing of the final report.

Description of Deficiency

The weld symbol type Y(t), as specified by the Engineer in fabrication of certain cable tray and conduit hanger joint configurations, has not been properly fit-up nor has weld preparation been completed in accordance with AWS standards. The areas of major concern address lack of the minimum weld penetration and the proper 45° fit-up bevel.

Background Information

This welding problem and interpretation of the Y(t) weld symbol was initially identified and addressed by the Construction Quality Section on February 21, 1980, per Action Request No. 207, with a corrective action plan issued on March 24, 1980. The corrective action plan required that an expanded inspection program be conducted with the completed inspection documentation submitted to the Engineer for evaluation/approval prior to close-out of the AR. This

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activity was completed on March 11, 1982. Evaluation of these findings by the Engineer resulted in issuance of Nonconformance Report Nos. CQC 2443 and CQC 2444 and the subsequent reporting of this matter as a potential significant deficiency.

Corrective Action

The immediate concerns regarding the interpretation, proper joint preparation, and fit-up requirements have been discussed with the Contractor and the Contractor has imposed a Stop Work regarding this activity. Pending resolution of these items, which require training of craft and QC personnel and minor revisions to the work procedures, the Contractor will reinstate welding operations to satisfy the Y(t) weld joint requirements. This action is expected to be completed by June 1, 1982.

In the interim, the Engineer (GAI) is currently analyzing all supports with a Y(t) weld on a case-by-case basis to determine the adequacy of the existing weld. The approach to the analysis will consist of three parts: 1) The first part of the analysis will conservatively assume that no strength is provided by the Y(t) weld portion of the joint. A typical joint is made up of a combination of a Y(t) weld and fillet weld. If the joint does not pass with this assumption, the contractor will be required to provide an "as-built" condition of each joint. 2) The Engineer will analyze the "as-built" condition to see if the joint is structurally adequate. If the joint still does not provide adequate strength, 3) The joint is then either reworked or repaired as required.

Clarification and subsequent acceptance or required rework resulting from the evaluation outlined above will be issued on revisions to the existing Nonconformance Reports.

It is anticipated that the final review and the required rework/repair of the necessary supports will be completed by March 31, 1983, at which time we will submit our final report.

Sincerely,

Ronald L. Tonell for

Dalwyn R. Davidson
Vice President
System Engineering and Construction

DRD:pab

cc: Mr. M. L. Gildner
NRC Site Office

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