SOUTH CAROLINA ELECTRIC & GAS COMPANY

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M. C. JOHNSON VICE PRESIDENT AND GROUP EXECUTIVE SPECIAL SERVICES AND PURCHASING

October 26, 1978

United States Nuclear Regulatory Commission ATTN: Mr. James P. O'Reilly Director Region II - Suite 1217 230 Peachtree Street, Northwest Atlanta, Georgia

> Re: V. C. Summer Nuclear Station Unit #1 Response to NRC Audit Reports 50-395/78-16 and 50-395/78-17

Gentlemen:

SCE&G has evaluated the item of non-compliance identified as 78-16-01 in your report 50-395/78-16 and has the following response. In accordance with your wishes, we have included an explicit consideration of cause.

## 1. Cause

a) The failure to magnetic particle inspect each 4" and final weld over 3/8 inch thickness, has been evaluated by SCE&G/QC with the following results:

QC Inspectors have been accustomed to finding NDE requirements detailed on the Construction drawings. The drawings in this case specified only MT and the procedural requirement of FQCP 6.1.5 to perform volumetric MT when MT was specified on the drawing was overlooked.

b) The missing welder identification stamping for bracket to beam support weld of platform XAA-1A-AH has been evaluated by our constructor and SCE&G/QC with the following results:

The welder failed to stamp his identification number adjacent to the weld. This is believed to be an isolated case. This walder has since been terminated because he was not ameniable

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Mr. James P. O'Reilly Page 2 October 26, 1978

to following instructions from Supervision or the procedures. Welding Supervision failed to insure that the weld had been stamped per WE-II-03. At the time of construction of platform XAA-1-AH, (Fall 1977) structural steel welding was under supervision of the Ironworkers.

At the time of the inspection, SCE&G/QC was not procedurally required to check for physical ID Stamp on weld. Checks were made to certify that the welder was qualified for the particular type of welding that he was performing.

## 2. Immediate Corrective Steps Taken and Results

a) Beam to containment welds on beams 4B11 and 4B8L were confirmed to have had a properly conducted final MT inspection conducted and properly documented. In addition, a visual reinspection was conducted on these welds.

A review of the specification and a discussion with the Architect/Engineer revealed that the requirement to perform VMT when MT was specified was intended to apply only to the fabrication specification.

b) In relation to welder identification stamping for beam 4B8L, identification has been stamped adjacent to the weld on 10/18/78. Welding supervision was not responsible for the inspection of structural steel welding prior to February 1978. This was changed in February 1978 with the creation of Craft 65. Craft 65 is in the process of inspecting all welds made on platform XAA-1A-AH to insure that welder identification is stamped on all welds. This action is being verified by SCE&G/QC and QA.

## 3. Corrective Steps Taken to Avoid Future Noncompliance

- a) In relation to the failure to conduct volumetric MT, with Engineering concurrence, FQCP 6.1.5 was revised to delete the requirement for volumetric MT of all welds over 3/8". Inspectors have been cautioned on the importance of following all Procedures.
- b) In relation to the failure to stamp beam 488L A section on the stamping of welds is being added to the indoctrination and training program for new hire welders. Welding supervision

'Mr. James P. O'Reilly 'Page 3 October 26, 1978

has been reindoctrinated as to the requirement of WE-II-03 with each supervisor documenting his attendance to the retraining. All welders have been instructed in the requirements of stamping the welds and this shall be documented. In addition, FQCP 6.1.2 has been revised to add this ID check as an inspection point as a double check of welder qualifications.

## 4. Full Compliance Date

All actions identified as non-recurring actions were complete as of 10/25/78.

We trust that you will find the above information adequate to resolve item 78-16-01. We have reviewed both captioned reports and find no proprietary information contained there-in. Please feel free to contact us if we can provide any further information in relation to this matter.

Very truly yours,

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DAN/MCJ/jls

cc: C. J. Fritz G. C. Meetze