Associated Piping & Engineering Corp. 1707 West Compton Boulevard Post Office Box 4309 Compton, CA 90224 Tel. 213/537 7200



U.S. Nuclear Regulatory Commission 611 Ryan Plaza Drive, Suite 1000 Arlington, Texas 76012

July 23, 1982

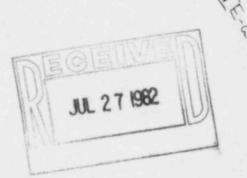
Attention: John T. Collins, Regional Administrator Region IV

Subject: Interim Report of Significant Construction Deficiency No.52 from Louisiana Power & Light-Waterford No.3

Dear Sir:

In regard to the subject 10CFR-50.55E notification, we are taking the following actions.

- 1. We have been to the jobsite and conferred with the customer and have initiated actions to have the necessary heat treatment performed at the site.
- 2. We have performed simulated heat treatment of a weld coupon at 1000° for six hours to keep the sensitization of the stainless steel flued head to a minimum. The test coupon was made utilizing materials of like thickness, chemical composition, and mechanical properties as the installed penetrations. The welding of the coupon was accomplished utilizing the same procedure as the original welds and all of the necessary weld procedure qualifications were performed and found satisfactory. Results of the testing are attached for your records.



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Johnson Controls, Inc.

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3. Our Engineering personnel are currently reviewing past contracts involving penetration assemblies to determine if this same type of dissimilar welding requiring heat treatment would have been involved. As soon as they complete this review, the orders involved, if any, will be reviewed by our Q.A. personnel to determine if this situation exists on any items. Upon completion of this review, you will be formally notified of our findings and the need, if any, for corrective actions at any other jobsites.

The cause of this discrepancy appears to have been strictly human error. The contract involving these two (2) penetrations had several other penetrations of the same type only of a thickness that did not require post weld heat treatment. The customer's specification had a requirement for post weld heat treatment as applicable to all thicknesses. Our engineering personnel submitted a request for waiver of this requirement and when the waiver came back approved they failed to note that the customer approval had a note that approval was only for units where the thickness would exempt PWHT. At the time this situation was at hand, the engineering department personnel were assigning welding procedures and the procedure selected did not include the required PWHT.

Our system has been changed since that time and our Welding Engineer, working in the Quality Assurance department, selects and assigns all welding procedures.

I am enclosing a copy of the request for waiver referenced above for your information.

If any additional information or action is needed by us at this time please advise me immediately.

Very truly yours,

ASSOCIATED PIPING & ENGINEERING CORP.

R.L. Juda

R.L. Jordan Quality Assurance Manager

RLJ:sb