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**Florida
Power**
CORPORATION

August 13, 1982
#3F-0882-05
File: 3-0-3-a-2

Mr. J. P. O'Reilly, Regional Administrator
Office of Inspection & Enforcement
U.S. Nuclear Regulatory Commission
101 Marietta Street N.W., Suite 3100
Atlanta, GA 30303

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
IE Inspection Report No. 82-03
Supplemental Response

Dear Mr. O'Reilly:

Florida Power Corporation (FPC), by letter dated April 30, 1982, Mardis to O'Reilly, initially responded to the violation listed in the subject Inspection Report. The following is a restatement of the Notice of Violation, our Response, and our Supplemental Response.

Notice of Violation:

The Licensee could not retrieve radiographs for valve to pipe welds MUV-437 and 429 in HPI line A-2. In discussing this problem with the licensee, the inspector expressed concern over the apparent loss/misplacement of these radiographs and asked how many other safety-related welds existed without the required fabrication records. Moreover, the inspector stated that as part of the corrective action, appropriate measures would have to be implemented to provide the necessary assurance that this matter was not of generic nature. The inspector stated that failure to retrieve required radiographs and/or supporting NDE documents is contrary to 10 CFR 50, Appendix B Criterion XVII as implemented by FSAR Section 1.7.6.7.1q, which requires that records shall be identifiable and retrievable. This failure to identify and retrieve required radiographs was identified as a violation (302/82-03-01), "Failure to Retrieve Construction Radiographs."

Response:

Florida Power Corporation concurs with the stated violation.

On February 18, 1982, radiographic film for welds MU-429 and 437 was not retrievable from Quality Files. Radiographic film for weld MU-456 was available, however, it contained a reader sheet discrepancy.

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A search of the construction records turned over from the B&W Construction to FPC plant files revealed no indication that the radiographic film for MU-429 and 437 was ever transmitted to FPC. B&W field construction procedures for MU-429 and 437 indicated that an acceptable radiograph was accomplished for these welds.

During the month of February 1982, several searches of the CR-3 Quality Files by Document Control personnel were accomplished. However, no further radiographic film or records were found concerning MU-456, 437 and 429. B&W Construction Company of Copley, Ohio also performed a review of their records for the missing information. They also could not find anything additional.

All radiographic film for the portion of the Make-Up System constructed by B&W was individually reviewed, all radiographic film folders in the CR-3 storage vault were examined for connection to MU-456, 437, and 429 welds, all microfiche records of B&W Construction records on the MU-456, 437, and 429 welds, and all PTL radiographic records were reviewed for any reference to welds MU-456, 437, and 429.

This comprehensive review revealed no additional information on MU-456 or 437. However, a radiographic film reader sheet for MU-429 was found. This indicated an acceptable radiograph had been taken of MU-429.

As of this date, the following information is available on MU-456, 437, and 429 welds:

- MU-456
 - a. Radiographic film
 - b. Radiographic film reader sheet
 - c. Correspondence clarifying original reader sheet discrepancies
 - d. Completed B&W field construction procedure

- MU-437
 - a. Completed B&W field construction procedure only

- MU-429
 - a. Radiographic film reader sheet
 - b. Completed B&W field construction procedure

To correct the deficient construction records, the following action will be accomplished:

1. MU-456 - No further action required. The radiographic indications were identified as suck-up (root concavity) which is acceptable under the original construction code.
2. MU-437 - Will be reradiographed during the next CR-3 refueling outage.

NOTE: A redesign of the High Pressure Injection nozzle to Make-Up System interface is being considered. If it is necessary, MU-437 will be cut out. Radiographs of the replacement weld will be taken and placed in the Quality Files.

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3. MU-429 weld area is not being considered for redesign at this time and will be reradiographed during the next CR-3 refueling outage.

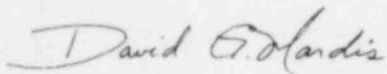
All plant records are presently being re-indexed and placed on a computerized retrieval system. This will help to alleviate a majority of the record retrieval problems experienced in the past.

Supplemental Response:

To assure that the apparent loss/misplacement of safety-related weld radiographs in the scope of the NSSS Erection Contract is not of generic concern, Florida Power Corporation will conduct an audit of those systems affected. This audit will be conducted within sixty (60) days after the record retrieval indexing of these welds are completed. The indexing should be completed by March 30, 1983.

Should there be further questions, please contact this office.

Very truly yours,



David G. Mardis
Acting Manager
Nuclear Licensing

MF/mlg

cc: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555