Docket No. 50-397 Bulletin Reply 82-01 RECEIVED

Washington Public Power Supply System

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December 21, 1982 G02-82-992

REGION VICE

Mr. R. H. Engelken Regional Administrator U.S. Nuclear Regulatory Commission Region V 1450 Maria Lane, Suite 210 Walnut Creek, California 94596

Subject:

NUCLEAR PROJECT NO. 2

IE BULLETIN 82-01, REV. 1, ALTERATIONS OF RADIOGRAPHS

OF WELDS IN PIPING SUBASSEMBLIES

- References: a) IE Bulletin 82-01, Rev. 1, Alterations of Radiographs of Welds in Piping Subassemblies, dated May 7, 1982.
 - b) Letter No. GO2-82-554, R.G. Matlock to R.H. Engelken, dated June 22, 1982, same subject.
 - c) Letter No. GO2-82-902, R.G. Matlock to R.H. Engelken, dated November 11, 1982, same subject.

The above referenced IE Bulletin required applicants for an Operations License or holders of Construction Permits (group 1, table 1) to independently reverify that the examined welds of the subassemblies fabricated by AP&E are acceptable for plant service.

Attachment 2 provides our final report describing the findings and corrective actions taken, signed under affirmation under the provisions of Section 182a, Atomic Energy Act of 1954.

If there are any questions regarding this item, please contact Roger Johnson at (509) 377-2501, extension 2712.

Program Director, WNP-2

LCF/kd

Attachments: 1. Affidavit

2. Final Report

cc: W.S. Chin, BPA

A. Forrest, Burns and Roe - HAPO

N.D. Lewis, NRC

J. Plunkett, NUS Corp.

R.E. Snaith, Burns and Roe - NY

A. Toth, NRC Resident Inspector (917Q)

Document Control Desk, NRC

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ATTACHMENT 1

STATE OF WASHINGTON
COUNTY OF BENTON

ROBERT G. MATLOCK, Being first duly sworn, deposes and says: That he is the WNP-2 Program Director of the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the permit holder herein; that he is authorized to submit the foregoing on behalf of said permit holder; that he has read the foregoing and attachments listed therein and knows the contents thereof; and believes the same to be true to the best of his knowledge.

DATED: December 20, 1982

On this day personally appeared before me R. G. Matlock to me known to be the individual who executed the foregoing instrument and acknowledged that he signed the same as his free act and deed for the uses and purposes therein mentioned.

R. g. MATLOCK

GIVEN under my hand and seal this 20 day of December, 1982.

Notary Public in and for the State of

Washington Residing at Kenneuse

ATTACHMENT 2

WASHINGTON PUBLIC POWER SUPPLY SYSTEM NUCLEAR PROJECT NO. 2 DOCKET NO. 50-397 DOCKET NO. CPPR-93 IE BULLETIN 82-01, REVISION 1 RADIOGRAPHS OF WELDS IN AP&E PIPING SUBASSEMBLIES

FINAL REPORT

BACKGROUND

As discussed in the interim reports, the results of the on-site review of the AP&E radiographs as required by IE Bulletin 82-01, Revision 1, were:

1.	Total number of welds with reviewed	1,682
2.	Number of welds with less than 2-4T sensitivity	96
3.	Number of welds with altered film	15
4.	Number of welds with incomplete signatures on the	
	RT reader sheets	51
5.	Number of welds which did not meet ASME Section III	
	weld quality	1

Of the 96 welds rejected with less than 2-4T sensitivity, 93 were for no 4T hold visible, 2 for the wrong size penetrameter, and 1 for no penetrameter outline visible.

For the 15 welds rejected for altered film, 3 were for alterations by scratches, 11 for alterations by pencil, and 1 with a cut hole making a light leak.

There were 51 welds with incomplete signatures on the RT reader sheets, and in every case, only the Authorized Nuclear Inspector's signature was missing. However, it is neither a Code requirement nor a WNP-2 specification requirement that the ANI sign the RT data sheet.

In regard to the one (1) weld which did not meet ASME Section III weld quality, the defect is very small, difficult to interpret, and therefore, is conceivably a legitimate oversight rather than an intentional disregard of Code requirements.

FINAL DISPOSITIONS

The final disposition for each of the above listed discrepancies was as follows:

No.'s 2 & 3

The companion film held by AP&E for the welds with less than the required sensitivity and altered film were subjected to a comparison review with the unacceptable project held film by Bechtel's level II RT technician. If the AP&E film was found acceptable, it was substituted for the unacceptable film and made the radiographs of record for the project, and filed in the jobsite QA records vault. Following this comparison review, No.'s 2 & 3 were reduced to:

- 2. Number of welds with less than 2-4T sensitivity
- 3. Number of welds with altered film

The above 22 welds with unsatisfactory radiographs were documented on two nonconformance reports. These two nonconformance reports were both dispositioned "rework", i.e., reradiograph to obtain satisfactory film quality.

All 22 of these welds have had the dispositions accomplished. Sixteen (16) of 22 have been reradiographed and determined to be acceptable. Four (4) of the 22 could not be reradiographed because the welds had been previously removed by the Mechanical Contractor. One (1) weld had been cut out and replaced and the remaining weld was deleted when a piping subassembly was replaced.

No. 4

The 51 welds without an ANI signature on the RT reader sheet did not require any corrective action as this is neither a Code nor project specification "violation."

No. 5

The one weld with a radiograph interpreted as containing a defect not meeting minimum Code requirements was documented on a nonconformance report. The nonconformance report was dispositioned "repair", i.e., repair the defect and reradiograph the repair weld. The weld has been repaired, radiographed and found acceptable.

STATUS OF CORRECTIVE ACTION

All corrective action has been completed.