

VENDOR INSPECTION REPORT

99900021

RO Report No.: 999-21/73-1

Docket No.: 9990002

Vendor: M. W. Kellogg Company
Williamsport, Pennsylvania

Type of Vendor: Pipe Fabricator

Type of Inspection: Vendor, Announced

Components Inspected For:

Licensee: Public Service Electric and Gas Company

Facility: Salem 2

Docket No.: 50-311

Dates of Inspection: January 16 and 17, 1973

Dates of Previous Inspection: November 30 and December 1, 1970

Principal Inspector: *R. L. Brown*
Ross L. Brown, Reactor Inspector

2-1-73
Date

Accompanying Inspector(s): NONE

Licensee Representative(s): Mr. A. Suchocki

Reviewed By: *E. M. Howard*
E. M. Howard, Chief, Facility Construction &
Engineering Support Branch

2-1-73
Date

Proprietary Information: _____

SUMMARY OF FINDINGS

Enforcement Action

None

Licensee Action on Previously Identified Enforcement Items

None

Design Changes

None

Unusual Occurrences

None

Other Significant Findings

Current Findings

- A. The MWK, Specification No. 8416 is being revised to meet the Random Radiographic requirements of ANSI B 31.7, "Nuclear Power Piping." This item is considered resolved. (Report Details, Paragraph 5)
- B. The vendor management issued instructions that all operations on shop travelers that are marked out must be signed by the authorized management personnel. This item is considered resolved. (Report Details, Paragraph 6)

Management Interview

Persons Present

Public Service Electric and Gas Company (PSE&G)

Mr. A. Suchocki, QA Engineer

United Engineers and Constructors (UE&C)

Mr. G. S. Korin, QA Engineer

Mr. T. F. Fleming, Vendor Surveillance Supervisor

M. W. Kellogg Company (MWK)

Mr. H. C. Pitcher, Plant Manager
Mr. W. J. Mitchell, Manager, Quality Control
Mr. E. F. Gerwin, Corporate Quality Assurance
Mr. N. C. Bear, Manager, Engineering Section

At the conclusion of the inspection, the inspector discussed the following items with those persons present.

- A. The vendor management stated that, "The Specification No. 8416 will be revised to meet the random radiographic requirements of ANSI B 31.7, Nuclear Power Piping Code. The revised specification will be submitted to PSE&G for review and approval." (Report Details, Paragraph 5)
- B. The vendor management stated that, "The practice of marking out operations on the shop travelers without proper signatures will be stopped." (Report Details, Paragraph 6)
- C. The vendor manager of quality control stated that, "MWK has assigned two welding inspectors to the production shop welding." He also stated that, "These inspectors have been furnished gages to inspect the weld reinforcement thickness and merge smoothly requirements of ANSI B 31.7, Paragraph 1-727.4.2(d)."

DETAILS

1. Persons Contacted

Public Service Electric and Gas Company (PSE&G)

Mr. A. Suchocki, QA Engineer

M. W. Kellogg Company (MWK)

Mr. W. J. Mitchell, Manager, Quality Control

Mr. K. Morgan, QA Engineer

Mr. F. J. Richards, Welding Engineer

United Engineers and Constructors (UE&C)

Mr. G. S. Korin, QA Engineer

Mr. D. Stitt, Resident, QA Surveillance Representative

2. General

- a. The MWK, QA/QC program was audited relative to 10 CFR 50, Appendix B, by Bechtel Corporation on November 1 and 2, 1972, and General Electric Company on December 19 and 20, 1972. Each audit identified a few minor deficiencies. These items have been or are being corrected.
- b. MWK was resurveyed by the ASME Code Committee in July, 1972, and recertified for code stamp authority.
- c. MWK presently has contracts to supply pipe spool pieces to twenty nuclear plant sites.
- d. The MWK, quality control department is headed by a manager, and reporting to him are two QC engineers, one codes and standards engineer, and two QC floor supervisors. Reporting to the floor supervisors are eight Level II, and two Level I examiners, six dimensional inspectors, and two welding inspectors.
- e. UE&C has two permanent resident vendor surveillance representatives, these persons receive technical and supervisory assistance from a home office supervisor and QA Engineer.

These vendor representatives perform a 100% review and acceptance of material certifications and radiographs.

3. Specification and Procedure Review

The inspector reviewed the following documents. No deficiencies were identified.

- a. PSE&G Purchase Order No. E 157133
- b. PSE&G Specification No. 61-6200, Revision 4d, which defines the general requirements for design (in accordance with ANSI B 31.1.0), installation fabrication and inspection (in accordance with ANSI B 31.7).

The specification supplements (piping schedule) specifies the acceptable material, base metal examination, forming requirements, solution anneal and other heat treatment requirements, welding requirements (ferrite content 3 - 12% determined by magna-gage), weld examinations, packaging, shipping and record requirements.

- c. UE&C QC Procedure, QCP-7-2 for "Resident Vendor Surveillance, Pipe Fabrications," which defines the responsibilities, duties, and reporting requirements.
- d. MWK Welding Procedure, P8-K-F7-SAW20, submerged arc welding of 304 stainless steel pipe, which defines the joint preparation, welding parameters, electrode size, and interpass temperature.

4. Record Review

MWK informed the inspector that only two Class II spool pieces and no Class I spools have been completed for the Salem 2 plant. The vendor also stated that the quality documentation (except the material certifications) is maintained with the shop traveler until the particular spool piece is completed.

The inspector reviewed the following selected records for the Residual Heat Removal System (Class II) spool pieces Mark No. 2-RH-1 and 2-RH-2. No deficiencies were noted.

a. Material Certifications

- (1) Pipe Heat No. 85281
 - (a) Chemical characteristics
 - (b) Physical properties
 - (c) 100% radiography of long seam
 - (d) Solution anneal and rapid quench heat treatment

- (2) Concentric Reducer, Heat No. 134780
 - (a) Chemical characteristics
 - (b) Physical properties
 - (c) Heat treatment, solution anneal and rapid quench

- (3) Welding electrode, Heat Nos. OB50A, mix 25, and C1 396T308
 - (a) Chemical characteristics
 - (b) Physical Properties
 - (c) Ferrite content, seven and nine percent respectively

b. Fabrication Records

- (1) Welding electrode withdrawal requisitions
- (2) Nondestructive testing records
- (3) Modified NP-1, Data Reports

5. Random Radiography

ANSI B 31.7, Nuclear Power Piping, Chapter 3-VI, Examination and Test states in part, " . . . one weld out of each group of ten welds made by each welder or welding operator, but not less than one weld in every 30-day period shall be examined by radiography."

Contrary to the above, the MWK Specification No. 8416, Paragraph 3, states in part, " . . . The process writer will select one seam on each fabrication sheet."

The inspector was informed this weld seam selection is made prior to welding.

The vendor manager, Quality Control stated that the specification will be revised to meet the intent of the code.

This item is considered resolved, but the specification will be audited during the next inspection.

6. Shop Travelers

The inspector observed shop travelers in the shop that have operations deleted by marking out the operation, these deletions were not signed off by responsible management.

The inspector was informed that the shop travelers are pre-printed to include the operations required for the majority of the spool pieces, and the process writer deletes those operations that are not required.

The MWK Manager, Quality Control issued instructions that all deletions to shop travelers must be signed by authorized personnel, or the traveler must be rewritten to omit those operations that are not required. This item is considered resolved, but the practice will be audited during the next inspection.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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ATOMIC SAFETY AND LICENSING BOARD

Before Administrative Judges
John H. Frye, III, Chairman
Dr. M. Stanley Livingston
Dr. Frank F. Hooper

In the Matter of

Docket No. 50-358-OL

CINCINNATI GAS & ELECTRIC CO. et al.
(Zimmer Nuclear Power Station, Unit 1)



NOTICE OF SUBSTITUTION OF COUNSEL

James H. Feldman, Jr. hereby withdraws as counsel for the Miami Valley Power Project (MVPP).

Lynne Bernabei hereby enters her appearance as counsel for MVPP. Ms. Bernabei is an attorney at law, is in good standing, and has been admitted to practice before the courts of the District of Columbia, and before the United States District Court for the District of Columbia. She has been retained by MVPP to represent it in this proceeding. Her mailing address and phone number are:

Lynne Bernabei, Esq.
Government Accountability Project/IPS
1901 O Street NW
Washington, D.C. 20009
(202) 234-9382

Thomas Devine hereby enters his appearance as counsel for MVPP. Mr. Devine is an attorney at law, is in good standing, and has been admitted to practice before the courts of the District of Columbia. He has been retained by MVPP to represent it in this proceeding. His mailing address and phone number are:

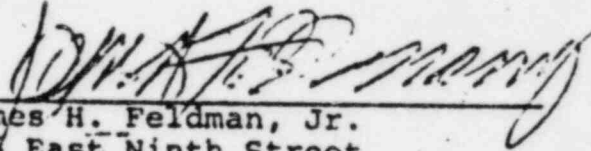
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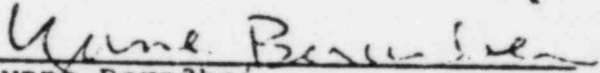
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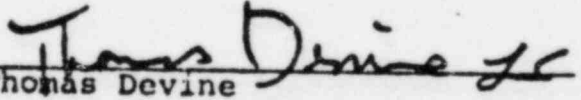
Thomas Devine, Esq.
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While both Ms. Bernabei and Mr. Devine will be representing
MVPP, only Ms. Bernabei need be added to the service list.

Respectfully submitted,


James H. Feldman, Jr.
216 East Ninth Street
Cincinnati, Ohio 45202


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NUCLEAR REGULATORY COMMISSION

REGION III

799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137A-64
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April 1, 1981

Docket No. 50-358

Cincinnati Gas and Electric
CompanyATTN: Mr. Earl A. Borgmann
Senior Vice President
Engineering Services and
Electric Production139 East 4th Street
Cincinnati, OH 45201

Gentlemen:

This refers to concerns identified during the ongoing investigation at the Zimmer site which were discussed with you and members of your staff on March 27, 1981, by R. F. Warnick and members of the investigation team and which Mr. Warnick and I discussed with you on March 31, 1981, in the Region III office. The investigation began on January 12, 1981, and is expected to continue for several more weeks. The results of the investigation will be documented in two or more investigation reports.

The NRC's concerns relating to ongoing construction related activities are the subject of this Immediate Action Letter. This letter documents the following corrective measures which we understand you have initiated or plan to take concerning the problems identified by the NRC:

1. Concerning QA Staffing

CG&E will increase the size and technical expertise of the CG&E QA organization by adding individuals qualified in the areas of radiography and nondestructive testing, piping supports and hangers, welding, structural design and fabrication, electrical design and construction, and metallurgy. We understand CG&E will utilize temporary personnel qualified in these areas until permanent staff members have been hired.

2. Concerning Independence and Separation Between Kaiser Construction and Kaiser QA/QC

CG&E will take action by April 15, 1981, to assure independence and separation of the QA/QC function performed by Kaiser from the construction function.

3. Concerning QC Inspections

Using the personnel described in item 1 above, CG&E will conduct 100% reinspections of QC inspections conducted by Kaiser and other contractors after the date of this letter. This will continue until the

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April 7, 1981

revised CG&E audit program as described in item 10, below, is implemented by these qualified individuals and RIII releases this requirement.

4. Concerning QC Inspection Procedures

All QC inspection procedures will be reviewed and revised (where appropriate) by qualified design engineers and QA personnel. These reviews will be conducted by personnel independent of the construction organization to confirm that the procedures include appropriate inspection requirements and applicable hold points. The activities controlled by these QC inspection procedures will not be performed after the date of this letter until the applicable procedure has been reviewed and approved.

5. Concerning Training

QA/QC personnel at the Zimmer site will receive training on any new procedures and practices resulting from actions taken to fulfill provisions of this letter prior to implementation of the procedures. In addition, refresher training will be given prior to June 1, 1981, on (a) the identification and documentation of nonconformances, deficiencies, and problems, (b) the procedure for resolving nonconformances, deficiencies, and problems, (c) the feedback mechanism for informing the identifying individual of the resolution of the nonconformance, deficiency, or problem, and (d) the avenue of appeal should the identifying individual disagree with the adequacy of the resolution.

6. Concerning Deviations from Codes and FSAR Statements

Prior to May 1, 1981, the procedures governing the identification, reporting, and resolution of deviations from Codes and FSAR statements will be reviewed for adequacy and revised as appropriate. The procedures will require CG&E to review and approve the resolution of any such deviations.

7. Concerning the Voiding of Nonconformance Reports

The procedures governing nonconformance reporting will be reviewed for adequacy. The review will be accomplished not later than April 10, 1981. The disposition of each nonconformance report together with appropriate justification will be documented.

8. Concerning QA/QC Records

The review and alteration of existing QA and QC records has been stopped. These records will be controlled by CG&E until a program defining records

Cincinnati Gas and Electric
Company

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April 7, 1981

control, usage, and adequacy has been prepared by CG&E and agreed to by RIII.

9. Concerning Conditions Adverse to Quality

CG&E will perform a 100% review of all surveillance and nonconformance reports written by contractor personnel after the date of this letter. This program will continue until RIII releases this requirement.

10. Concerning the Audit Program

The existing CG&E audit program will be reviewed and revised by June 1, 1981, to include technical audits of construction work and more comprehensive and effective programmatic audits.

Please inform us immediately if your understanding of these items is different from that stated above.

Sincerely,

James G. Keppler
Director

cc:

Mr. J. R. Schott, Plant
Superintendent

Central Files

Reproduction Unit NRC 20b

AEOD

Resident Inspector, RIII

PDR

Local PDR

NSIC

TIC

Harold W. Kohn, Power
Siting Commission

Citizens Against a Radioactive
Environment

Helen W. Evans, State of Ohio