



Pennsylvania Power & Light Company

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Norman W. Curtis
Vice President-Engineering & Construction-Nuclear
215 / 770-5381

December 10, 1982

Mr. Thomas T. Martin, Director
Division of Engineering and Technical Programs
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

SUSQUEHANNA STEAM ELECTRIC STATION
NRC INSPECTION OF AUGUST 23-26
& SEPTEMBER 2-3, 1982
REPORT NO. 50-387/82-36
ER 100450 FILE 840-4
PLA-1429

Dear Mr. Martin:

Reference is to your letter of November 12, 1982, which forwarded IE Inspection Report No. 50-387/82-36 and "APPENDIX A, NOTICE OF VIOLATION."

Your notice advised that PP&L was to submit within thirty (30) days of the date of the letter, a written reply addressing (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved.

The "NOTICE OF VIOLATION" cites one (1) violation which is stated below and is followed by its corrective action response.

Violation:

10 CFR 50.55a requires that the reactor coolant pressure boundary be constructed in accordance with the ASME III Code for Class I systems.

American Society of Mechanical Engineers (ASME) Boiler and pressure Vessel (B&PV) code Section III NB 5320 requires that indications observed in interpreting radiographic film are recorded and dispositioned. The proper disposition of linear indications that exceed code requirements is repair of the affected area.

ASME code Section V, T-263 and T-237, requires Penetrameters/markers be placed adjacent to the weld seam.

Contrary to the above, an NRC review of radiographs during August 23-26 disclosed the following: code inspected and accepted welds VRR-B31-1FWA11M and VRR-1B31-1FW-A13M contained unacceptable linear indications. Welds

VRR-B31-2FW-B14M and VRR-B31-2B16M had linear indications in radiographs that were not recorded or dispositioned, radiographs VRRB31-2FWB11M and VRR-B31-2FWB13M had penetrameters/markers within the weld.

Response:

(1) Corrective steps which have been taken and results achieved:

Bechtel Quality Assurance issued Management Corrective Action Report (MCAR) 1-83 which included a request to evaluate the condition, determine the cause and extent of the problem, and establish the corrective action to prevent recurrence. In response to this MCAR, a team of NDE Level III radiographic film interpreters was sent to the jobsite to re-review radiographs. A total of 3000 radiographs, representing 590 weld joints was reviewed. This total represented ten percent of the film read by the two Quality Control Engineers (QCEs) who were involved with the interpretation of the film questioned by the NRC Inspector plus approximately twenty film packages per each additional QCE Level II RT interpreter. Of this total sample, six questionable radiographs were identified. Three of the six were subsequently found to be acceptable, while the remaining three were identified on Bechtel NCRs 9776 and 9822 and PP&L NCR 82-1081. Weld numbers HBB-218-2-FW5R1 (NCR 9776), EBC-203-5-FW40 (NCR 9822) and DBB-102-1-FW10 (NCR 82-1081) have been reworked as required and their respective NCRs have been closed.

Subsequent to the identification of unacceptable indications in the recirc. riser welds, weld repair was accomplished as necessary and the welds were re-radiographed. All ASME Section III radiographs of recirc. riser welds have been reviewed and contain no unacceptable indications.

Investigation of the film for welds VRR-B31-2-FWB11M and VRR-B31-1-FWA13M revealed that radiographs having penetrameters and/or location markers in the weld were exposures where two weld seams appeared on the film and only one weld seam was being interpreted for acceptance. The penetrameters and location markers were placed on the weld seam not being interpreted for acceptance; therefore, corrective action for this item is not considered necessary.

With respect to the concern expressed that linear indications on welds VRRB-31-2-FW14M and VRR-B31-2-FWB16M were not recorded or dispositioned on the radiographic report it should be noted that neither the code in effect nor the RT procedures required recording acceptable indications. However, Bechtel Procedure RT-XG-2 has been revised to include the requirement that acceptable and unacceptable indication be recorded. Field implementation of this requirement became effective on October 28, 1982.

(2) Corrective steps which will be taken to avoid further violations:

A supplemental training program in RT film interpretation technique is under development by the Bechtel Material and Quality Services Department

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(M&QS). All Bechtel RT Level II interpreters will be required to complete this training program.

The film viewing area has been re-arranged to isolate that activity from other work occurring in the vicinity in order to reduce distraction to the film reader.

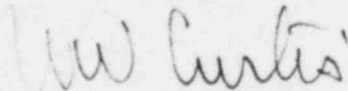
A review by M&QS of the RT qualification records of the two individuals involved with the interpretation of the film questioned by the NRC Inspector has revealed that the training and experience requirements of both SNT-TC-1A and the Bechtel NDE Training and Certification Program are met. However, the practice of retaining both outdated and current resumes in the individual's active file tends to create a confusing picture of the individual's qualifications. Therefore, Bechtel's NDE Training and Certification Practice (NEPQ-2) has been revised to require retention of current resumes only and to better delineate the requirements of industry standards and codes. This revision was issued for use on 10/1/82. In addition Bechtel Quality Control, in conjunction with M&QS, has initiated review of certified NDE personnel files in order to remove all but the current resumes.

- (3) The date when full compliance will be achieved:

Completion of the supplemental training program for RT Level II interpreters is scheduled for January 28, 1983.

Updating of certified NDE personnel files is scheduled to be complete by January 7, 1983.

We trust the Commission will find our response acceptable.



Norman W. Curtis

JS:rla

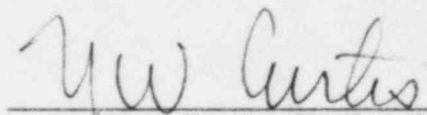
cc: Mr. Gary G. Rhoads
U.S. Nuclear Regulatory Commission
P.O. Box 52
Shickshinny, PA 18655

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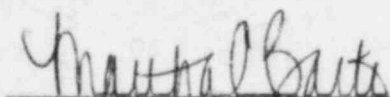
COUNTY OF LEHIGH)

I, Norman W. Curtis, being duly sworn according to law, state that I am Vice President-Engineering & Construction-Nuclear, of Pennsylvania Power & Light Company and that the facts set forth on the attached response by Applicants to the NOTICE OF VIOLATION dated November 12, 1982, are true and correct to the best of my knowledge, information and belief.



Norman W. Curtis
Vice President-Eng. & Constr.-Nuclear

Sworn to and subscribed
before me this 10th day
of December, 1982.



MARTHA C. BARTO, Notary Public

Allentown, Lehigh County, Pa.
My Commission Expires Jan. 13, 1986