

Washington Public Power Supply System

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REGION V IRE

Docket No. 50-508
50-509

October 22, 1982
G03-82-1088

U. S. Nuclear Regulatory Commission, Region V
Office of Inspection and Enforcement
1450 Maria Lane, Suite 260
Walnut Creek, California 94596-5368

Attention: Mr. D. M. Sternberg
Chief, Reactor Projects Branch No. 1

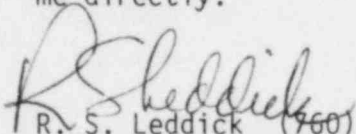
Subject: NRC INSPECTION AT WNP-3/5
IE REPORT NO. 50-508/82-17, 50-509/82-07
NONCOMPLIANCE (50-508/82-17/01)

Reference: NRC Letter, dated September 24, 1982, Mr. D. M. Sternberg
to Mr. R. S. Leddick, NRC Inspection at Washington Nuclear
Projects No. 3 and 5 (WNP-3/5)

The referenced letter reported the results of the NRC inspections conducted on August 1-31, 1982, of activities authorized by NRC Construction Permit No. CPPR-154. One 10CFR50, Appendix B, Violation (subject non-conformance), concerning a failure to attach non-safety-related "Q" decking to safety-related structural steel in accordance with an approved process, was identified.

Attached is a Supply System approved report detailing corrective/preventive actions taken and the date of full compliance for the subject noncompliance. The Supply System will consider the violation to be satisfactorily resolved by the November 3, 1982, date of full compliance.

Should you have any questions or desire further information, please contact me directly.


R. S. Leddick (760)
Program Director, WNP-3

DRC:nj

Attachments

cc: Mr. J. Adams - NESCO
Mr. D. Smithpeter - BPA
Ebasco - New York
WNP-3 Files - Richland

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PDR ADOCK 05000508
Q PDR

VIOLATION A (Noncompliance 50-508/82-17/01)

10CFR50, Appendix B, Criterion IX, Control of Special Processes, states in part that "measures shall be established to assure that special processes are...controlled and accomplished by qualified personnel using qualified procedures..."

Contrary to this requirement, on August 10, 1982, at the 395-foot level of the containment building between columns CR-22 and CR-2, it was found that the civil-structural contractor for the containment building was attaching non-safety-related "Q" decking to safety-related structural steel using explosively driven 0.177 x 0.75-inch pins. The process had not been qualified, nor had approved procedures been developed.

This is a severity Level V violation applicable to Unit 3.

CORRECTIVE STEPS TAKEN

Upon notification by the NRC, the installing contractor (J.A.Jones, Contract 265) was immediately directed by Ebasco QA to discontinue use of the Hilti power actuated fasteners that secured Q-decking to the structural steel. An Ebasco letter was subsequently issued to the contractor, reiterating the previous verbal directions to stop utilizing the power driven fasteners.

An NCR was initiated by Ebasco to document the deficiency and obtain an engineering resolution. To facilitate an engineering evaluation and disposition of the NCR, a test sample (several fasteners driven into an A-36 steel plate with a thickness equivalent to the minimum thickness of the top beam flange to which the Q-deck is secured) was shipped to Ebasco New York. Examination of the sample disclosed the following:

- 0 The A-36 base metal showed no micro-structural degradation.
- 0 The hardness of the extruded base metal increased slightly over that of the unaffected base metal.
- 0 The deformed or cold-work region did not increase in hardness. The maximum $R_c 23$ is approximately "0.010" from the tip.
- 0 Minimal contact corrosion possibility - Hilti fasteners are sealed by extruded base metal below the metal deck and concrete above.

Based on the above, a "use-as-is" disposition was recommended. However, any future use of the Hilti power driven fasteners has been prohibited unless an installation procedure is provided by the contractor, or Ebasco Construction and reviewed by Ebasco New York Engineering.

CORRECTIVE STEPS TAKEN (CONTINUED)

In addition to the actions noted above, Ebasco QA initiated a Quality Finding Report (QFR) to identify the improper use of the Request For Information (RFI) identified by the NRC Inspector. Corrective actions taken in response to the QFR included a review of RFIs and Field Problem Memos (FPMs). FPMs were included in the review because they are utilized by Morrison-Knudsen (Contract 263) in the same manner that RFIs are used by the other contractors. Of approximately 3,000 documents reviewed (included 100% of Contract 265 RFIs) by all Resident Engineering disciplines, eleven instances were found where a Design Change PCP should have been initiated in lieu of an RFI or FPM. Specifically, ten RFIs and one FPM were found incorrect. As a result, the RFIs/FPM were changed to Design Change PCPs and processed accordingly. It should be noted that it was not necessary to change the engineering directions specified on the eleven documents.

CORRECTIVE STEPS TAKEN TO AVOID FURTHER ITEMS OF NONCOMPLIANCE

Based on a review of the governing design change control procedures, the review of RFIs/FPMs and discussions with Resident Engineering, it is considered that the subject violation can be attributed to personnel error. Therefore, the following preventive actions have been initiated:

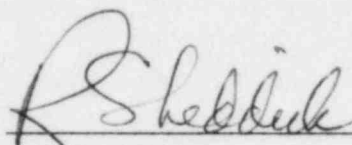
- To emphasize the procedural requirements governing the proper use of the RFI/PCP, a Resident Engineering Memo was issued for review and signature by all applicable Civil personnel.
- A follow-up meeting with all applicable Civil Resident Engineering personnel was conducted to further emphasize the requirements for design changes and clarification. The meeting and attendees were documented by a Resident Engineering Memo.
- Similar training as noted above is scheduled for the other engineering disciplines responsible for problems encountered during the RFI/FPM review.

DATE OF FULL COMPLIANCE

All corrective/preventive actions noted above, except the training of other engineering disciplines, have been completed. Upon completion of this training on November 3, 1982, the date of full compliance will be achieved.

R. S. LEDDICK, Being first duly sworn, deposes and says: That he is the Program Director, WNP-3, for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that he is authorized to submit the foregoing on behalf of said applicant; that he has read the foregoing and knows the contents thereof; and believes the same to be true to the best of his knowledge.

DATED 22 OCT 82, 1982.

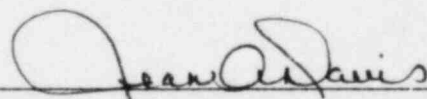


R. S. LEDDICK

STATE OF WASHINGTON)
) ss
COUNTY OF GRAYS HARBOR)

On this day personally appeared before me R. S. LEDDICK 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.

GIVEN under my hand and seal this 22nd day of October, 1982.



Notary Public in and for the State
of Washington
Residing at Olympia