Washington Public Power Supply System

D. Stornburg

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October 12, 1982 G01-82-0715

Nuclear Regulatory Commission Region V 1450 Maria Lane, Suite 210 Walnut Creek, California 95496

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

- Subject: NUCLEAR PROJECT NO. 1 NRC INSPECTION WNP-1 DATES OF INSPECTION FEBRUARY 22-26, 1982 CONSTRUCTION PERMIT NO. CPPR-134
- Reference:
- Letter T.W. Bishop to R.W. Root dated May 17, 1982, NRC Inspection of Washington Nuclear Project 1
- 2) Letter G01-82-0412, dated July 2, 1982, NRC Inspection WNP-1, Dates of Inspection February 22-26, 1982 and March 2-12, 1982
- Letter T.W. Bishop to R.W. Root, dated August 5, 1982

As requested by you in reference three (3) the following additional information is provided in response to your comments for the corrective actions for noncompliance Findings B, C and D which was provided in reference two (2).

Due to differences which exist between certain items related to Findings A of reference three (3) and the Supply System's response which was provided in reference two (2), it is requested that a meeting be held at our mutual convenience to resolve these issues.

Finding B - Review of Weld Filler Metal Withdrawal Slips

The time from August 1, 1981 through December 31, 1981 was selected to include the items identified in the NRC Item of Noncompliance and to determine if a generic problem existed. Based on the results of this review, a generic CNCR would be written to document the deficiencies identified during the review.

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Subsequent to providing this response, UNSI expanded the review to include additional weld withdrawal slips. All identified nonconforming conditions will be identified on a CNCR.

Due to the expanded review of weld withdrawal slips, it is currently expected that the CNCR will be submitted to the Engineer by October 29, 1982.

Adequacy of QCRFI Responses

The QCRFI system is being deleted. If there is any question as to the validity/accuracy of requirements or acceptability of an item, an inspection report will be written by the QC inspector and dispositioned in accordance with QCP/CP 10, Nonconforming Items, Materials, Parts & Components.

The CMO (Bechtel Power Corporation) will review a sample of QCRFI's for the adequacy of responses. If inadequate responses are identified, the sample size will be increased. In addition, the CMO will perform ongoing surveillances of the contractor's responses to IR's in the future.

The required procedure revisions and CMO review of QCRFI's will be completed by January 4, 1983.

Action Taken to Preclude Repetition

QCP/CP 7 will be revised to require the issuance of an Inspection Report in accordance with QCP/CP 10 when weld rod is found to be out for more than the acceptable time period. In addition, the training of personnel prior to restart of Quality Class I construction activities will preclude repetition of this problem.

Finding C - Action taken to preclude the use of memorandum to change requirements of welding procedures specification.

The affected WPS's have been revised to indicate when material thickness does not apply for fillet welds. These procedure revisions have been approved by the Engineer.

Prior to restart of construction criticities, UNSI procedures will be reviewed by the CMO/AE for inconsistencies, excessive requirements and ambiguities. This effort will be and at eliminating need in the future for issuing memorandums to procedure for clarification purposes.

Additionally, strict procedural compliance will be reinforced during the indoctrination of personnel assigned to the Project. D. M. Sternberg Nuclear Regulatory Commission Page Three October 12, 1982 G01-82-0715

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Finding D - Action taken to confirm the adequacy of inspections performed by quality control personnel for all previously accomplished work.

As was discussed with the Inspector during the course of NRC Inspection 82-11, the Supply System is tracking the NRC Item (81-06-08) associated with the 100% reinspection of hanger welds as an uncompleted item. It was also indicated that, regardless of the contract change, reinspection will be performed. If it is determined that a 100% reinspection of hanger welds will not be performed, the NRC will be so informed and provided with the details of the alternate reinspection program.

Prior to performing the reinspection program identified above and/or prior to restart of construction, UNSI will perform special training for the QC inspection personnel with special emphasis placed on weld acceptance criteria.

UNSI has established a training department which will conduct and coordinate training of UNSI personnel. Upon construction restart, the CMO will perform random reinspection during the performance of surveillances of the contractors accepted work to ensure effective training for future work.

Note: Underlined portions are provided to emphasis differences between your request and the Supply System's original commitment. It is the Supply System's position that adequate objective evidence has not been provided which warrants confirming the adequacy of inspection performed by quality control personnel for all previously completed work to date.

21/ R. W. Root/

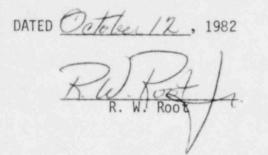
Acting Assistant Program Director (821)

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cc: V. Stello, Director of Inspection, NRC A. Toth, NRC (819) J.D. Batemen, UE&C (895) J.P. Laspa, Bechtel (861) V. Mani, UE&C (897) STATE OF WASHINGTON) COUNTY OF BENTON)

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R. W. Root, being first duly sworn, deposes and says: That he is the Acting Program Director, WNP-1/4, 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.



On this day personally appeared before me R. W. ROOT 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 12 and day of Cataber, 1982

Notary Public in and for the State of Washington

Residing at Mehlan