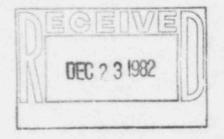


Omaha Public Power District

1623 HARNEY # OMAHA, NEBRASKA 68102 # TELEPHONE 536-4000 AREA CODE 402

December 17, 1982 LIC-82-400

Mr. W. C. Seidle, Chief Reactor Project Branch 2 U. S. Nuclear Regulatory Commission Region IV 611 Ryan Plaza Drive, Suite 1000 Arlington, Texas 76011



Reference: Docket No. 50-285

Dear Mr. Seidle:

Final Report on the Investigation of Paxton & Vierling Steel Traceability

The purpose of this letter is to summarize the results of Omaha Public Power District's investigation into the Paxton & Vierling Steel (PVS) traceability issue, as initially detailed in the District's letter dated November 1, 1982. This report will provide the final results of the District's investigation into this problem and serves to close this item.

The District's investigation into the traceability issue consisted primarily of three parts:

- A review of material test reports held by PVS in their inventory back to the last zero or low inventory point for a given type of material.
- (2) A chemical analysis of available rod, pipe, and plate samples representing various CQE purchase orders from PVS.
- (3) A physical analysis of available shape and plate samples representing CQE purchase orders from PVS.

The following results were obtained:

(1) Our review of material test reports indicated that PVS was, in fact, able to recover material test reports for all material in their inventory back to a zero or low inventory point. The District has obtained copies of these material test reports and they have been reviewed by the Quality Assurance Department. Any discrepancies found during our review have been subsequently resolved to our satisfaction through PVS or through their supplier. At this point, the District is satisfied that there is a sufficiently high probability that the material received from PVS is represented by one of the material test reports currently held by the District. IE 3/

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- (2) Several samples of rod, pipe, and plate material were sent to an independent laboratory for chemical analysis. This material was representative of several purchase orders involving PVS steel and was intended to provide backup data on plate material and provide verification for rod and pipe samples where physical testing was impractical due to their shape or size. All chemical analyses indicated that the steel provided was in fact the steel ordered by the District; in most cases, A-36 and in other cases for pipe material A-106 or other specified material was verified. No further action in this area is planned.
- (3) A number of samples of shapes and plates representing approximately 25% of the PVS purchase orders over the past two years were sent to an independent laboratory for physical analysis. All samples were found to be acceptable when compared to the ASTM specification for A-36 steel with the exception of one 3/8" plate sample which tested approximately 10% below the specification for A-36. This place, however, was verified to be A-36 through the chemical analysis in (2) above. Further investigation showed that the piece of 3/8" plate in question was never used in the plant, and the plate is being returned to PVS for replacement with a qualifying piece of steel. This single instance of failure to meet physical specifications is not felt to be representative of any generic problem with PVS, since this is the only instance where failure occurred. The chemical analysis verified that the steel was in fact A-36, and the failure of the plate physicals could very well be due to laminations from the rolling process which occurs after the material samples are tested by the supplier.

In conclusion, our investigation uncovered no evidence that material ordered by the District was other than that specified. Material test reports for steel in the PVS inventory were made available to the District and have been satisfactorily reviewed. Therefore, this investigation will be closed with no further investigative action on the part of the District planned. Administrative controls have been established by the District to control the future use of PVS as a supplier of CQE steel and to assure the traceability by heat number of the PVS steel.

Sincerely,

W. C. Jones Division Manager Production Operations

WCJ/TLP: jmm

cc: LeBoeuf, Lamb, Leiby & MacRae 1333 New Hampshire Avenue, N.W. Washington, D.C. 20036