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November 22, 1982 VIEE ANPP-22357-BSK/JAR

U. S. Nuclear Regulatory Commission Region V Creekside Oaks Office Park 1450 Maria Lane - Suite 210 Walnut Creek, California 94596-5368

Attention: Mr. D. M. Sternberg, Chief Reactor Projects Branch 1

Subject: NRC I&E Inspection of August 30 - September 3, 1982 File: 82-019-026; D.4.33.2

Dear Sir:

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This letter refers to the Inspection conducted by Messrs. J. H. Eckhardt and G. Hernandez on August 30 - September 3, 1982, as documented in your letter of October 8, 1982, of activities authorized by the Nuclear Regulatory Commission (NRC) Construction Permit Nos. CPPR-141, 142 and 143.

During this Inspection, two (2) items of noncompliance were identified. Our response to these items of noncompliance (Severity Levels IV and V - Supplement II) is presented in the enclosed Attachment A.

Very truly yours,

E.E. Van Brui

E. E. Van Brunt, Jr. APS Vice President Nuclear Projects Management ANPP Project Director

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Enclosure

cc: See Attached Page 2



U. S. Nuclear Regulatory Commission Attention: Mr. D. M. Sternberg, Chief Page 2

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cc: T.G. Woods, Jr. D. B. Fasnacht A. C. Rogers J. A. Roedel W. E. Ide A. C. Gehr W. H. Wilson R. L. Patterson R. M. Grant

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- D. R. Hawkinson
- G. C. Andognini J. R. Bynum

STATE OF ARIZONA)) ss. COUNTY OF MARICOPA)

I, Edwin E. Van Brunt, Jr., represent that I am Vice President Nuclear Projects of Arizona Public Service Company, that the foregoing document has been signed by me on behalf of Arizona Public Service Company with full authority so to do, that I have read such document and know its contents, and that to the best of my knowledge and belief, the statements made therein are true.

Edwin E. Van Brunt, Jr.

Sworn to before me this 23rd day of November , 1982. Notary Public My Commission expires:

My Commission Expires May 19, 1988

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ATTACHMENT A

NOTICE OF VIOLATION

Docket No. 50-528, 50-529 Construction Permit No. 141, 142

 Comsip Customline Corporation drawing no. 5875-1 Revision 6 which governs the welding of the Unit 1 main control room panels to floor embed plates, specifies a 14 inch weld at each end of panel no. B04 and a 16 inch weld at each end of panel nos. B03 and B05, respectively.

Contrary to the above, on September 1, 1982, 3-1/2 inches of weld metal were found to be lacking at each end of panel no. B04 and 5-1/2 inches at each end of panels nos. B03 and B05, for a total of twenty-nine inches of missing weld metal. These welds were inspected and accepted by Bechtel's Quality Control on October 14, 1980.

This is a Severity Level IV Violation (Supplement II), applicable to Unit No. 1 (Docket No. 50-528).

RESPONSE

The "short" weld lengths were a result of the Bechtel Quality Control Inspector who inspected and accepted the welds to the drawing which indicates "approximately 16 inches". The welds were in accordance with the appropriate drawing. However, the Quality Control Engineer should have requested Project Engineering establish an actual or minimum length instead of an approximate dimension.

Comsip Customline Drawing 5875-3, Revision A, which shows the Main Control Room Panel B05, indicates that the welds at the edge of the panel should extend from the outside edge of the access plate to the end of the panel. Additionally, it indicates that the weld should be approximately 16 inches. Similarly, Drawing 5875-2, Revision 6, indicates a similar condition for panel B03. Drawing 5875-5, Revision 10, indicates a similar condition for panel B04, except that the weld length is indicated as approximately 14 inches. In each case, the actual weld extends from the outside edge of the access plate to the end of the panel. The welding is acceptable to the definitive criteria shown on the drawing, i.e., from the edge of the access plate to the end of the panel. The error made by the QC Inspector was that he accepted the welds without requiring the drawing to be changed to bring the numerical criteria into agreement with the weld location criteria.

1. Corrective Steps Taken and Results Achieved

Upon notification of the infractions, a Quality Control Inspector was designated to reinspect the welds. NCR's E-J2337 and E-J2338 were initiated to document the welds. The as-built weld pattern was reconciled against the weld pattern specified by Comsip Customline Corporation. This was done in Bechtel Calculation 13-CC-ZQ-J01. The results of this calculation shows a reduction in first mode frequency of 2Hz which is less than a 1/5 octave change. This is considered to be acceptable. Further, the seismic stresses in the as-built pattern were shown to be acceptable. This investigation, calculation, and resolution includes all the Unit 1 main control panels (the "horseshoe"). The as-built tie-down method (welding) meets the seismic requirements. The NCR's were dispositioned "use-as-is" based on this review.

Additionally, APS Nuclear Engineering performed an informal evaluation of the installed configuration of BO2 - BO6 against calculations supplied by Comsip Customline. Comsip Customline performed an analysis using ten 3 inch welds in front and ten 3 inch welds in the rear of panels BO2 to the centerline of BO4 for a total of 60 inches of weld. The 3 inch welds were assumed to be located at each of the twenty (20) vertical beams front and rear.

Our inspection performed on November 11, 1981, determined that the total welding used on BO2 to the centerline of BO4 was approximately 230.5 inches. Similarily for the corresponding symetrical section of the centerline of BO4 to BO6 consisted of approximately 220 inches. These total weld lengths were approximately 3.8 and 3.7 times ,respectively, the weld lengths analyzed for seismic integrity.

Since the analysis assumed that the welds were evenly applied around the item in question, and the seismic forces were evenly distributed, our inspection has indicated that the welds are relatively symetrically placed and exceed the analyzed welding by a minimum of 3.7 time. Therefore, we conclude that there are no concerns anticipated during seismic events and this fully meets the design criteria.

2. Corrective Steps That Have Been Taken To Avoid Further Items of Noncompliance

Field Change Requests showing the as-built welding patterns have been issued against the appropriate Comsip drawings. Quality Control Inspectors have been reinstructed on the importance that proper inspection criteria must be on drawings for acceptance of installed equipment.

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3. Date When Full Compliance Was Achieved

November 17, 1982

2. Paragraph 17.1A.12 of the PSAR requires that..."Inspection, test and work procedures shall include the requirement that, whenever inspection, test, or measuring equipment is found to be out of calibration, the acceptability of all items inspected, tested, or measured since the last documented calibration must be evaluated." This requirement is implemented by paragraph 6.1.9 of WPP/QCI-7.0 which states that ..."If during an acceptance test or during the post test or a recalibration check, an instrument...is determined to be defective a "Defective Instrument Report (DIR)"...shall be prepared.... A copy of the DIR shall be filed with the Certificate of Calibration."

Contrary to the above, on September 2, 1982, the inspector identified three examples of Dimetrics Automatic Welding Machine calibration checks where certain parameters were found to be out of the specified range indicated on the Certification of Calibration and no Defective Instrument Reports (DIR) were prepared.

This is a Severity Level V Violation (Supplement II), applicable to Unit No. 2 (Docket No. 50-529).

RESPONSE

The Dimetrics Automatic Welding Machines were found to have certain parameters out of range and Defective Instrument Reports (DIR) were not prepared. This resulted from an erroneous interpretation of Work Plan Procedure 7.0.

1. Corrective Steps Taken and Results Achieved

Upon notification of this infraction, steps were taken immediately to address the specific parameters that were found to be outside the specified range and evaluate the effect on welds produced. It was determined that the out-of-range conditions did not have any effect on the quality of the welds. NDE has verified the quality of welds made by these machines was acceptable.

These machine parameters are checked on a periodic basis (360) operating hours), and adjusted to optimum conditions. This is similar to a periodic maintenance requirement. Minor variations are compensated for by the operator as he controls and adjusts

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the machine to achieve an acceptable weld. The settings (and their accuracy) are not to test, verify, or assure the quality of the weld. This equipment is not considered Construction Measuring and Test Equipment and a DIR is inappropriate to document an out-of-tolerance condition. The only requirement is that the condition be corrected.

2. Corrective Steps That Have Been Taken to Avoid Further Items Or Noncompliance

A review of Work Plan Procedure 7.0, Calibration and Control of Construction Measurement and Test Equipment, was conducted. This review determined that Paragraph 5.4.3, which addressed the Dimetrics Automatic Welding Machines as a piece of measurement and test equipment, had been erroneously placed in the procedure. The inadvertent placement of this pargraph imposed requirements on the welding equipment that are intended for measuring and testing devices such as precision tools, optical aids, etc. Bechtel Standard CPD-21 and Vendor Operating Manuals provide instructions for calibration and equipment maintenance programs for the Dimetric Automatic Welding Machines. Both documents should have been referenced independently in WPP/QCI 7.0 to provide for mainten ce/calibration of the dimetrics. A procedure change has been issued to delete Paragraph 5.4.3 and add Appendix XII which provides for maintenance and calibration of this equipment.

The reason for this change is to isolate the calibration and maintenance requirements for the dimetrics from the stringent requirements of Construction Measuring and Test Equipment. We will therefore maintain control over the frequency and performance of the required maintenance checks, while working within the parameters of Bechtel Standard CPD-21 and Vendor Operating Manuals.

3. Date When Full Compliance Was Achieved

October 1, 1982

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