

**Washington Public Power Supply System**

Box 1223 Elma, Washington 98541 (206) 482-4428

Docket No. 50-508

February 11, 1983  
G03-83-134

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 IE REPORT NO. 50-508/82-16

References: (1) NRC Letter, dated October 22, 1982, Mr. D. M. Sternberg to Mr. R. S. Leddick, NRC Inspection at Washington Nuclear Project No. 3 (WNP-3).  
(2) Supply System Letter, G03-82-1199, dated November 24, 1982, Mr. R. S. Leddick to Mr. D. M. Sternberg, same subject.  
(3) NRC Letter, dated December 27, 1982, Mr. D. M. Sternberg to Mr. R. S. Leddick, same subject.

Reference (3) requests additional information concerning the Supply System's response to three Items of Noncompliance contained in Reference (2). The additional information is contained in Attachments 1, 2 and 3. In addition, the Supply System is amending the response to Violation E (Noncompliance 50-508/82-16/09) as contained in Attachment 4.

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

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

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

## ATTACHMENT 1

### NRC Question

Violation A (Noncompliance 50-508/82-16/02) - Failure to design the electrical penetrations to be testable to the requirements of ASME Code.

It is our understanding that you are requesting a code case or a code addenda which will allow full penetration welds in lieu of double butt welds and allow gas medium testing of joints subsequent to rendering them inaccessible. It is also our understanding that you will assure that a vacuum box test with air falls within the ASME definition of "a gas medium test, such as a Halide Leak Detection Test."

### Supply System Response

The Supply System and Ebasco have not agreed upon the response. We anticipate sending our response by April 1, 1983.

## ATTACHMENT 2

### NRC Question

Violation B (Noncompliance 50-508/82-16/04) - Control of Design Changes for Beam Clips.

Please provide additional information to support your assertion that the design and review of the structural attachments was solely an Ebasco function in light of the definition of design in ANSI N45.2.11 and the following excerpts from the 113 and 448 structural steel specifications:

Specification No. 113 - 1.0 Scope This specification covers the  
Section 2A materials, design, detailing...of the  
structural steel framing....

Specification No. 448 - Responsibility and Performance Contractor  
Paragraph 1.4 shall be solely responsible for...detailing...  
the structural steel....

### Supply System Response

Ebasco has sole responsibility for design as discussed below:

- ANSI N45.2.11 defines design as:

Technical and management process which commences with identification of design input and which lead to and include the issuance of design output documents.

Ebasco carries out this function as described on Ebasco drawing G-3510 Sheet 1 by reference to the following note from drawing G-3514:

BEAM CONNECTIONS SHALL BE IN ACCORDANCE WITH EBASCO DESIGN GUIDE AS-12-2 "BEAM CONNECTION ANGLES". BEAM END REACTION IN KIPS, ARE GIVEN ON DRAWINGS WHEREVER GREATER THAN CAPACITY OF CONNECTION SHOWN ON EBASCO DESIGN GUIDE AS-12-3.

- The responsibilities in the referenced specifications have been clarified as demonstrated by the following:

1. CB&I's Nuclear Quality Assurance Manual as amended and submitted with their proposal for Contract 113 scope of work contains the statement:

2.4 CB&I does not have design responsibility.

This qualification of CB&I's proposal was evaluated prior to the award of the contract and was considered to represent a correct interpretation of the intent of the contract requirements.

2. The record of correspondence between CB&I and Ebasco during the process of CB&I's engineering activities further supports the position that Ebasco retained the design responsibility.

Attachment 2 - cont'd

It is evident from the above that Ebasco provided design inputs, specified criterias and guidelines, and acted to resolve questions of interpretations of those criterias whereas CB&I only performed detailing services pursuant to Ebasco direction. In addition, CB&I submitted their checked shop detail and erection drawings to Ebasco for review and approval prior to fabrication.

Although Ebasco's review does not relieve CB&I of the responsibility to correctly implement design requirements, Ebasco reviews are performed to assure that CB&I correctly transformed the criteria into detail fabrication drawings. However, Ebasco, as the responsible design Engineer, has the authority to modify any of the contractor's details as required to implement changes to the project design.

### ATTACHMENT 3

#### NRC Question

Violation C (Noncompliance 50-508/82-16/07) - Use of weld filler material certified by "typical" test values.

It is our understanding that you will provide correction to your statements regarding the testing of weld filler material and will discuss your action to assure the accuracy of information provided to the NRC.

#### Supply System Response

The amended response to the corrective actions taken is as follows:

1. All weld filler metal heats purchased by J. A. Jones with "typical" CMTRs have been documented on NCRs.
2. All but three heats were tested satisfactorily to the requirements of material specifications. Three heats were not tested because samples could not be obtained.
3. The three untested heats were dispositioned on the NCRs as "Use As Is" for the following reasons:
  - A. Heat 92007D011 (E-7018-A1) had the manufacturer's "actual" chemical analysis and certificate of compliance. Engineering concluded that sufficient evidence existed to conclude that filler metal with the documented chemistry would produce physical properties within the ranges of the material specification.
  - B. Heats 1126C5A and 08-26C5A (E-7016) - The exact locations of the use of these heats are known. It has been determined that the service conditions are essentially unstressed and therefore, the weld filler metal was accepted based on a certificate of compliance.

#### Additional Supply System Comments

During the preparation of the original response, two errors occurred. First, Ebasco incorrectly limited the scope of the response to J. A. Jones Purchase Order 01-449-P-1125. Second, one heat listed in the purchase order, 92007D011, was deemed acceptable based on a partial manufacturer's CMTR (actual chemistry only) and certificate of compliance. While this conclusion has not changed, the initial Supply System response indicated that no such deviation existed.

The Supply System strives diligently to ensure that all responses are accurate. However, when second and third parties are necessary to develop a response, the possibility exists that the translation of information from party to party may become unclear. We believe this was the root cause of the incorrect information sent to you.

Attachment 3 - cont'd

This incident has reemphasized to all parties the need for clarity and accuracy and all personnel will continue to make every effort possible to minimize recurrals of this type.

The Supply System is reviewing the management process by which we control the generation of responses to the NRC. The reason for the review is to determine how to modify the management process to minimize the potential for inaccurate information. We anticipate this review to be completed by March 3, 1983 and will implement any changes as expeditiously as feasible.

The results of the study and any appropriate changes will be available for your review at WNP-3.

ATTACHMENT 4

Violation E (Noncompliance 50-508/82-16/09) - Structural Bolting - Reversed Nuts/Forging Bursts.

The Supply System's response (Reference (2)) indicated that full compliance would be completed by December 15, 1982. The inspection and Ebasco evaluations have taken longer than expected and now anticipate February 25, 1982 as the date of full compliance.