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**Florida
Power**
CORPORATION

February 9, 1983
#3F-0283-03

Mr. J. P. O'Reilly
Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
Office of Inspection & Enforcement
101 Marietta Street N.W., Suite 3100
Atlanta, Ga. 30303

SUBJECT: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
IE Inspection Report No. 82-32

Dear Mr. O'Reilly:

Enclosed is Florida Power Corporation's response to the Notice of Violation included in Inspection Report 82-32, dated January 11, 1983.

Sincerely,

G. R. Westafer
Manager
Nuclear Licensing and Fuels Management

PGH/mlg

Enclosure

cc: Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

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FLORIDA POWER CORPORATION RESPONSE
INSPECTION REPORT 82-32
February 9, 1983

VIOLATION

Title 10, Code of Federal Regulations, Part 50.55a, paragraph (a) (1), requires structures and components be fabricated and inspected to quality standards commensurate with the importance of the safety function. ASME Boiler and Pressure Vessel Code, Section IX, 1980 edition, paragraph QW-301 delineates the requirements for welding performance qualification tests of welders.

Contrary to these requirements, on December 15, 1982, welder performance qualifications were not in accordance with QW-301 requirements in that a welder was permitted to fabricate production weld(s) beyond the limits of his qualification.

This is a Severity Level V Violation.

RESPONSE

- (1) FLORIDA POWER CORPORATION'S POSITION: Florida Power Corporation agrees with the violation. A welder did exceed the limits of his qualification during the fabrication of certain production welds.
- (2) DESIGNATION OF APPARENT CAUSE: This violation was caused by a misinterpretation of the ASME Boiler and Pressure Vessel Code, Section IX, 1980 edition.

Florida Power Corporation's interpretation of Section IX had been that if a welder is qualified to weld a maximum thickness in all positions (i.e., horizontally, vertically, etc.) and then if this welder is requalified to weld a larger thickness in only one position, then the welder is also requalified to weld in all positions for the larger thickness.

On July 29, 1982, Florida Power Corporation requested an interpretation of QW-301 from the ASME Boiler Code Committee. On September 17, 1982, the Committee responded that the welder is not re-qualified to weld all positions for the larger thickness.

- (3) IMMEDIATE CORRECTIVE ACTIONS: On August 3, 1982, the welder was post qualified to assure that he was capable of performing the weld in all positions for the larger thickness.

Florida Power Corporation has researched all of its welding records to assure that there are no more similar welder qualification violations.

- (4) LONG TERM CORRECTIVE ACTIONS: Florida Power Corporation has determined that the immediate corrective actions are adequate to prevent a recurrence of this violation.
- (5) DATE OF FULL COMPLIANCE: On August 3, 1982, Florida Power Corporation was in full compliance.