



GPU Nuclear Corporation
Post Office Box 388
Route 9 South
Forked River, New Jersey 08731-0388
609 971-4000
Writer's Direct Dial Number:

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ATTN: Document Control Desk
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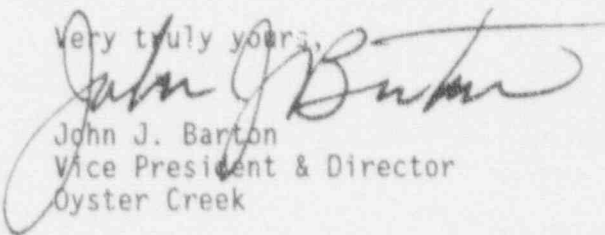
Dear Sir:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Inspection Report 91-18
Reply to Notice of Violation

This letter is being written as required by the Notice of Violation documented in Appendix A to NRC Inspection Report 91-18. Attached is GPU Nuclear's response to the violation.

If any further information is required, please contact Mr. Thomas Blount at (609) 971-4390.

Very truly yours,


John J. Barton
Vice President & Director
Oyster Creek

JJB/TB:jc
Attachment
cc: Administrator, Region I
Senior NRC Resident Inspector
Oyster Creek NRC Project Manager

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Attachment

Response to Notice of Violation

Inspection Report 91-18

Violation:

10 CFR 50, Appendix B, Criterion V requires that activities affecting quality shall be prescribed by procedures of a type appropriate to the circumstances and shall be accomplished in accordance with these procedures.

The GPUNC Operational Quality Assurance Plan for Oyster Creek requires that measures shall be established to assure that special processes are accomplished in accordance with qualified procedures.

Ultrasonic examination procedure GE-UT-201, Revision 0 requires that the calibration block for the ultrasonic examination of weld overlay repair shall be overlaid with weld material of the same thickness range as that of the part to be examined.

Contrary to the above, on May 22, 1991, the weld overlay repair of the Shutdown Cooling System weld NU-3-5 containing a weld overlay 0.29" thick was ultrasonically examined using calibration block No. 206 containing a weld overlay 0.450" thick.

This is a Severity Level IV violation (Supplement 1).

Response:

GPUN concurs with the violation cited above.

Reason for the Violation

The cause of this violation was the vendor's NDE technician failing to follow the approved procedure.

- a) The violation occurred due to the ISI Vendor using a memo from a GPUN certified UT Level III examiner to justify the use of Calibration Block #206 which was contrary to the vendor's procedure GE-UT-201 Revision 0 requirements. This procedure violation was an isolated case and not considered a programmatic problem with the ISI Vendor NDE procedures.

- b) When the weld overlay repair for NU-3-5 was to be examined the vendor requested Calibration Block #206 from the NDE/ISI Level III Examiner. The selection of this block made it apparent that the procedure required an amendment to paragraph 4.5 in order to satisfy the overlay calibration block thickness criteria. The vendor failed to make the necessary procedure change and performed the examination of weld NU-3-5. The vendor later acknowledged that there was a violation of their procedure but at the time of performing the examination, the vendor felt the transmittal from the NDE/ISI Level III for Calibration Block #206 was the technical approval to proceed with the inspection.

The Corrective Steps That Have Been Taken And The Results Achieved

The vendor was notified of their failure to comply with procedure GE-UT-201, Revision 0. They were requested to furnish a cause for the deficiency, actions taken to correct the deficiency and actions to prevent recurrences. The reporting of this deficiency was documented on GPUN's Quality Deficiency Report No. 91-044. The vendor's response for corrective action was to revise the procedure in order to make allowances for the variations in weld overlay thickness ranges of weld repairs regarding the criteria for selecting a calibration standard.

The procedure change was reviewed by GPUN and determined to be technically satisfactory.

The vendor's project management personnel were instructed that memorandums shall not supersede the requirements of approved procedures. The technicians were instructed that should steps within a procedure not allow for an inspection to be performed properly, they are to contact their supervisor for clarification.

Based on the preceding corrective actions, no further action is necessary.

The Date When Full Compliance Was Achieved

Full compliance was achieved on June 27, 1991 when the GPUN's Quality Deficiency Report No. 91-044 was closed. This procedure violation did not reduce the safety of any components, system, or personnel. The examination was not required to be repeated. With the procedure changed, the use of Calibration Block #206 was acceptable.

Provisions Regarding the Cracked Core Top Guide

Inspection Report 91-18 requested information regarding any additional provisions to be taken with respect to the cracked core top guide.

At this time, GPUN is still investigating the root cause and plans to reinspect the cracked location as well as additional cells during 14R as part of the reactor vessel internals inspection. This is consistent with the information contained in Inspection Report 91-18.