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PACIFIC GAS AND ELECTRIC COMPANY

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J. O. SCHUYLER
VICE PRESIDENT
NUCLEAR POWER GENERATION

September 16, 1983

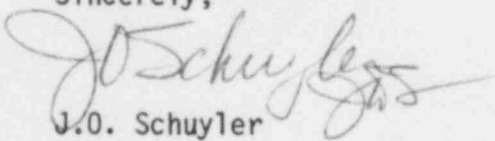
Mr. John B. Martin, Regional Administrator
U.S Nuclear Regulatory Commission, Region V
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596-5368

Re: Docket No. 50-275, OL-DPR-76
Docket No. 50-323
Diablo Canyon Units 1 and 2
IE Inspection Report 83-10/83-13 --
Supplementary Response to Notice of Violation

Dear Mr. Martin:

On June 20, 1983, PGandE submitted a response to a Notice of Violation contained in the NRC Inspection Report 83-10/83-13 dated May 19, 1983. The response addressed, in part, the qualifications of a H.P. Foley welder. This submittal provides supplementary information regarding the welder qualifications to clarify and correct the original response. Also included are additional corrective actions taken to prevent recurrence.

Sincerely,


J.O. Schuyler

Enclosure

cc: Service List

8310280048 831021
PDR ADOCK 05000275
Q PDR

ENCLOSURE

SUPPLEMENTARY RESPONSE TO NRC NOTICE OF VIOLATION
CONCERNING WELDER QUALIFICATION
(NRC INSPECTION REPORT 83-10/83-13)

ISSUE

After discussion with NRC representatives during the week of September 5, 1983, PGandE has found its response of June 20, 1983 to the NRC Notice of Violation dated May 19, 1983, Item A.2, is incorrect and incomplete. The Statement of Explanation given in the PGandE response was:

"Notice of Violation states that the H.P. Foley Company Welder (Symbol JX) did not perform welding necessary to maintain a current qualification status after January 27, 1983, and H. P. Foley retained this welder on the 'Active Welders List' as of March 31, 1983. This welder was, in fact, qualified during this period of time as explained below.

The method an auditor or inspector would use to determine the status of a welder's qualification would be to review documentation contained in the certification folder maintained by the contractor for each welder. The certification folder normally contains the welder certification test report for initial certification of each welder, any related training documentation and in-process weld inspection reports used to extend a welder's qualification for a specific weld process. As the result of a clerical error, the in-process weld inspection reports were not included in the welder's (Symbol JX) folder at the time the inspector made an examination of his record.

PGandE Quality Control Department conducted a search of the H.P. Foley Co. files. As a result of this search in-process weld inspection reports were found which showed that the welder in question (Symbol JX) had performed welding to the SMAW process on October 26, 1982, January 20, 1983, and February 9, 1983. Based upon the above work his AWS qualification was current at the time of the NRC inspection."

The response states that In-Process Welding Inspection Reports H.P. Foley Form (HPF/IPIR) were found in the H.P. Foley Co. files which provided extension of the welder's qualification. In actuality, the search of the H.P. Foley Co. files produced a Raceway Weld Inspection Report, H.P. Foley Form (HPF/RWIR) dated October 26, 1982 which shows that the welder had used the Shielded Metal Arc Welding (SMAW) process less than 6 months prior to the NRC inspection. (Other documents were found indicating that

the welder also welded on January 20, 1983, and February 9, 1983, but are irrelevant to the state of his qualification.) H.P. Foley Procedure H.P.F. QCP-5, paragraph 5.1, states "Welder qualification shall be effective providing the welder has used the process qualified for within the following time periods: 6 months for welders qualified under Appendix 'B', 'C', 'E' and 'G'..." (Appendix 'C' for Welder JX). Based upon the foregoing, the welder was qualified at the time of the NRC inspection in accordance with American Welding Society (AWS) code requirements.

H.P. Foley procedure H.P.F. QCP-5 goes on to say in paragraphs 5.1.1 and 6.2 that:

"5.1.1 The Quality Control Department shall monitor each welder for each process qualified within the time period above, to insure that the welder's qualifications do not lapse (HPF/IPIR, EXHIBIT 1)."

"6.2 In-process welder inspection shall be documented on The Howard P. Foley Company Form HPF/IPIR (EXHIBIT 1)."

The H.P. Foley Co. Quality Control Department did not complete an In-Process Welding Inspection Report (Form HPF/IPIR) for Welder JX during the period January to April, 1983. This was a H.P. Foley procedural violation, but not a violation of the AWS code.

CAUSE

The inaccuracies in the Statement of Explanation as submitted were due to a miscommunication between the Onsite and General Office Personnel. The original draft Statement of Explanation prepared by the onsite originator contained the following statement:

"The in-process weld inspection reports were not included in welder J. Peet's (Symbol JX) folder, this was a clerical error. An investigation by the PGandE Quality Control Department revealed that J. Peet had checked out weld rod on two occasions during the period of time in question. Further investigation into the work assignments for welders on the specific day the weld rod was checked out provided documented evidence that J. Peet did perform welding to raceway support on October 26, 1982, to the SMAW process."

The clerical error cited was that the H.P. Foley Q.C. clerical staff would review the welder qualification folders to determine the expiration date for each welder and issue a memo to the Q.C. Inspector to perform the In-Process Welding Inspection Report prior to the expiration date. The expiration dates were not included on the Active Welder's List prior to April 1983. In this case the clerical staff apparently failed to inform the appropriate individual in the Quality Control Department that Welder JX was due for qualification verification. The documented evidence which existed to provide verification that Welder JX did perform welding to the SMAW process was the Raceway Weld Inspection Report (Form HPF/RWIR) noted earlier.

During the process of incorporating the onsite originator's input into the final response, the above Statement of Explanation was incorrectly interpreted by the General Office personnel to mean the In-Process Weld Inspection Reports (H.P. Foley Form HPF/IPIR) were the documented evidence noted and that the clerical error was the failure to place these documents in the welder's folder. The response in its final form was reviewed by PGandE's General Construction Department Management, but not by the onsite originator. The management review did not detect the characterization error in the response.

CORRECTIVE ACTION PERTAINING TO WELDER QUALIFICATION

1. The welder's (JX) certification folder presently contains documents sufficient to verify his current qualification. The documents consist of H. P. Foley Form (HPF/RWIR) dated October 26, 1982, and a welder qualification test record (HPF/WQTR-C) dated April 8, 1983. The qualification records and files of all other H.P. Foley welders were reviewed during April 1983 and found to be current and in compliance with H.P. Foley Procedure QCP-5 and AWS code requirements.

2. The system for maintaining welder qualification files has been changed such that the Q.C. clerical staff notifies the Q.C. Inspector by memo when an in-process welding inspection is due on a specific welder two weeks prior to the expiration date. Additionally, each qualified welder is listed on the Active Welder's List. Unless an In-Process Welding Inspection Report (H. P. Foley Form HPF/IPIR) is received extending a welder's qualification, his name is removed by the Q.C. clerical staff from the Active Welder's List when his qualification expires. The Active Welder's List, which includes expiration dates for each welder, is issued to all weld rod stations. Only those welders named on the list are allowed to draw rod.

CORRECTIVE ACTION PERTAINING TO THE QUALITY OF RESPONSES TO NRC

A procedure and routing sheet have been developed for assuring review of submittals to the NRC concerning onsite construction activities. The review will assure that any NRC concerns are clearly and comprehensively addressed and that the responses are factually correct. The reviewers will include as a minimum the Field Construction Manager and onsite originator.