



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
795 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

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MEMORANDUM FOR: Thomas A. Rehm, Assistant for Operations, Office of
the Executive Director for Operations

FROM: James G. Keppler, Regional Administrator

SUBJECT: INFORMATION REQUESTED BY H. R. MYERS IN DECEMBER 15,
1982 MEMORANDUM FROM KAMMERER TO REHM (CORRECTIONS)

The enclosure provides recommended corrections to the January 5, 1983, Region III response to the December 15, 1982 request from Dr. Myers. The specific changes are underlined and/or marked in the right-hand margin. Provision of this information was a large task, considering our workload at Zimmer. In meeting the deadline for submittal of the information we did not perform an adequate review. Our further review identified these recommended corrections.

If you have any questions on this matter, please contact R. Warnick of my staff.

James G. Keppler
James G. Keppler
Regional Administrator

Enclosure: As stated

cc w/encl:
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New Item (1) should read:

Item (1):

Region III Investigation Report 358/80-09 indicates, on page 7, that Nuclear Energy Services, Inc. (NES) reviewed radiographs of welds from October 1979 until early April 1980. The Staff would like to obtain any documents prepared by NES personnel in the course of their work, including documents summarizing their findings. Of particular interest are the summary and documents related to the fourteen (14) welds which were replaced.

Response to Item (1):

This request pertains to a matter reported to the Commission under 10 CFR 50.55(e) as 50-358/M-22 and a related matter reported as 50-358/M-50 (see Attachments 1 through 11 to this memorandum). As reported in Attachment 4, the NES review of radiographs was completed in May or June 1980, but there were problems with the review. CG&E prepared a final report (Attachment 5) which included work performed by NES and CG&E personnel. The draft CG&E report which resulted in Attachment 5 is included as Attachment 12b. Since no summary documents were prepared by NES personnel and since the documentation involved is voluminous and not easily retrievable, the NRC Resident Inspector performed a review in December of 1982 of the available documentation with particular emphasis on weld quality. The following paragraphs summarize that review and the documentation which is available, including attached copies of corrective action documents pertaining to the NES review. If other specific documentation is required, the Zimmer Resident Office will attempt to obtain the documentation.

Findings by NES personnel were documented on one (1) or two (2) three-page checksheets, depending upon the time frame (i.e., for welds reviewed prior to December 1979 there were two three-page checksheets utilized, one for documentation/technique reviews and one for weld quality review; subsequent to December 1979, a single checksheet was utilized). In addition, a daily log was maintained by NES which is composed of 257 pages. This log was used to delineate the acceptability of each weld reviewed in each of the three areas reviewed and is presently being used to track completion of corrective action for each of the identified deficiencies.

This inspector reviewed that NES log and prepared a list of all welds which were rejected for weld quality problems. That list is Attachment 12a which indicates a total of 66 welds were rejected by NES for weld quality.

This inspector then performed a review of the H. J. Kaiser NR log through the time frame of the NES review (July 1979 through August 1980) in an attempt to identify nonconformance reports related to these welds. The inspector found that approximately 15 of the 66 welds rejected by NES for weld quality were documented in the H. J. Kaiser Nonconformance Reporting System. In addition, the inspector found nonconformance reports (NR's) for welds HP-39, RH K-206, FC-95, and FC K-68 which had been re-radiographed for technique problems and were subsequently documented on H. J. Kaiser NR's. These 19 H. J. Kaiser NR's are Attachment 13 (a-s). (Fourteen of these NR's were initiated prior to the verbal report to the NRC on May 1, 1980.)

The inspector then performed a review of CG&E NR's issued as a result of CG&E activities to close out the NES review findings. The inspector found that approximately 33 of the 66 welds rejected by NES had been documented on NR's initiated by CG&E. Thirty-two (32) of the 33 NR's are Attachment 14 (a-ff). Two (2) of these 33 NR's (Attachment 14a and 14cc) concerned welds previously identified on H. J. Kaiser NR's. One of these NR's (weld RH K-7) was not available for review at the time of the inspection.

Attachments 15 and 16 represent samples of the documentation checklists used by NES in the performance of their review. The checklists provided represent two of the fourteen welds originally reported by CG&E in Attachment 1. There should be a total of 2485 checklists, one for each weld reviewed, however, since some welds were reviewed using two checklists, (as discussed above), there may be more than 2485 checklists. These checklists are not centrally located and although retrievable, they are not easily retrievable.

Of the remaining 20 welds for which an NR could not be identified by this inspector, a sample of the documentation packages and radiographic packages was examined to determine the status of these welds. The sample consisted of three welds, RH K-213, MS-127, and LP-33 (Attachments 17-19). The results of this review revealed some obvious discrepancies which require further review by the NRC. For example, regarding weld LP 33 (refer to Attachment 18):

- The documentation package weld data sheet No. 4635 indicates that the radiographs for weld LP 33 were final accepted by the H. J. Kaiser NDE Level III on November 4, 1976, and by the Hartford Steam Boiler ANI on November 11, 1976. This data is backed up by the attached radiographic vendor sheet which was probably the subject of the NES review.
- The radiographic package indicates that the radiographs in the CG&E vault (approved radiographic storage onsite) were prepared and accepted by the H. J. Kaiser NDE Level III on August 26, 1980/December 29, 1980, and have not been reviewed by the ANI. This was not the film which was the subject of the NES review of June 9, 1980 and the original film was not in the vault.

The quality of weld LP 33 appears to be indeterminate at present due to a lack of historical records and questionable traceability of the radiographs presently in the CG&E vault for this weld (i.e., no NR to justify disposition of the original final radiograph). This matter requires further review by an NRC specialist inspector.

In addition to the above, there were approximately 24 welds noted as "cutout" in the NES review log. A single weld was sampled of these 24 (weld HP K-20). This sample review indicated that the weld in question had been removed from the plant and replaced by weld HP K-22 in May 1979, prior to commencement of the NES review. The documentation related to this weld is included as Attachment 20.

New Item (2) should read:

Item (2):

Page 8 of the same investigation report indicates discrepancies were found with weld No. CY 606. Nonconformance report NR 633 was issued for this weld on January 21, 1977. On October 3, 1980, NR 5172 (also for this weld) was marked "Accept-As-Is." The Staff would like copies of these NR's, all subsequent NR's on this weld, and a description of the circumstances surrounding replacement of the weld.

Response to Item (2):

Attachments 21 and 22 provide information in addition to earlier attachments related to weld CY 606. As identified in Attachment 5 and Attachment 12, the H. J. Kaiser NDE Level III did not recognize the ASME Code requirements of paragraph NB 4424 addressing root concavity. The deficiency identified (Attachment 21c) was excessive root concavity which resulted in repair (not replacement) of the weld. In addition, during repair of CY 606, the NRC Resident Inspector identified a deficiency in the installation of the gamma plug associated with CY 606 (CY 606 GP) which resulted in repair of the gamma plug and further investigation by the licensee; and this matter has been reported to the Commission under 10 CFR 50.55(e) report M-56 dated September 2, 1982.