

Southern California Edison Company

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January 17, 1992

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Martin

Docket No. 50-361
Reply to a Notice of Violation
San Onofre Nuclear Generating Station, Unit 2

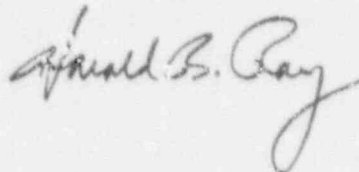
Reference: Letter from M. R. P. Zimmerman (USNRC) to
Harold B. Ray (SCE), dated November 19, 1991

The referenced letter forwarded a Notice of Violation resulting from the routine announced NRC inspection conducted from August 5, 1991 through August 16, 1991, at the San Onofre Nuclear Generating Station, Unit 2. This inspection was documented in NRC Inspection Report No. 50-361, 23.

In accordance with 10 CFR 2.201, the enclosure to this letter provides the Southern California Edison (SCE) reply to the Notice of Violation. As discussed with Mr. Phil Johnson (NRC) on December 17, 1991, this response was delayed in order to provide a complete response.

If you have any questions regarding SCE's response to the Notice of Violation or require additional information, please call me.

Sincerely,



Enclosure

cc: U. S. NRC Document Control Desk, Washington, D.C. 20555
C. W. Caldwell, NRC Senior Resident Inspector, San Onofre
Units 1, 2 and 3

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ENCLOSURE

Reply to a Notice of Violation

The enclosure to Mr. Zimmerman's letter dated November 19, 1991, states in part:

"A. 10 CFR Part 50, Appendix B, Criterion V, requires that activities affecting quality shall be prescribed by documented procedures and shall be accomplished in accordance with those procedures.

"The Topical Quality Assurance Manual, Introduction, states: 'The Quality Assurance Program for ... testing of San Onofre Units 1, 2 and 3 is described by the provisions of this manual. The program is applied to the following quality affecting areas: ... 2) activities conducted in compliance with the American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section III and XI.'

"Southern California Edison Procedure SO123-XVII-1.1, Revision 1, dated January 26, 1988, Inservice Inspection Program Maintenance, paragraphs 6.1.2 and 6.1.3 require that the following individuals must approve the initial issue and all subsequent revisions to the Inservice Inspection Program: the ISI Engineer; an independent reviewer; the Supervisor, Nuclear Services; the Manager, Operations and Maintenance Support and the Site Quality Assurance Manager.

"Contrary to the above, on July 5, 1983, the current Inservice Inspection Program, Revision ., was issued without the required approvals.

"This is a Severity Level IV Violation, Supplement 1."

RESPONSE TO ITEM A

1. Reasons for the violation.**Personnel Error**

The ISI program for Units 2 and 3 was incorrectly used without the required review and approvals. Personnel responsible for the ISI program inappropriately elected to utilize the unapproved program as an expediency, pending resolution of ISI program open items with the NRC. This is contrary to SCE policy and practice. This personnel error was the primary cause of this event.

2. Corrective steps that have been taken and the results achieved.**Review of Requirements with Personnel**

Personnel currently responsible for the supervision and implementation of the ISI programs have been counseled concerning the requirement to adhere to the procedural requirements regarding review and approval of the ISI program prior to its use in the field.

Creation of New Site Support Technical Division

ISI Program responsibility has been relocated from the Site Support Services Division to a new division entitled "Site Technical Services Division" and a new manager has been assigned. This is expected to provide increased management oversight of the ISI Program.

3. Corrective Actions that will be taken to avoid further violations.**Issuance of New ISI Programs**

The ISI program plan for the Unit 3 cycle 6 refueling outage will be confirmed to be in accordance with the program plan submitted to the NRC prior to the next Unit 3 refueling, scheduled for January 25, 1992.

The entirety of the Unit 2 ISI and Unit 3 ISI programs will be issued, with the appropriate reviews and approvals, by April 30, 1992 and September 30, 1992 respectively, approximately one year prior to the scheduled end of the first 10 year inspection period.

4. Date when full compliance will be achieved

Full compliance will be achieved by September 30, 1992, when both the Units 2 and 3 ISI programs are formally issued.

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The enclosure to Mr. Zimmerman's letter dated November 19, 1991, states in part:

"B. 10 CFR Part 50, appendix B, Criterion XVII, requires that quality documentation be identifiable and retrievable.

"Southern California Edison Company procedure 7 H, ASME CODE Program Quality Assurance Records, dated December 31, 1990, requires that final radiographs be retained for the lifetime of the plant.

"Contrary to the above, on August 9, 1991, the final weld radiographs for ASME Code Class 2 weld Nos. 02-76-184 through 189 were not retrievable.

"This is a Severity Level IV violation, Supplement I."

Response to Item BBackground

In 1984, Associated Piping and Engineering (AP&E) supplied fabricated pipe spool pieces to SCE via a series of six shipments under Purchase Order (P.O.) V4105542. One of the six shipments supplied two pipe spools. The spools contained six welds, Inservice Inspection (ISI) weld identification numbers 02-76-184 through 189.

In attempting to locate radiographs associated with the six welds, SCE determined that radiographs for the other five shipments of pipe spools are also not retrievable. In addition, copies of the radiographs could not be obtained from AP&E since they are no longer in business.

SCE retrieved, from its Document Control Center, AP&E's code data reports and radiograph reader sheets for all six shipments. These ASME (NDE) records provide objective evidence that welds on all spools shipped to SCE were radiographed and the welds were acceptable.

1. Reasons for the Violation.

Due to the lapse of time since the pipe spools were supplied, the specific reason for not being able to retrieve the radiographs for the pipe spools cannot be determined.

The intent of the procurement documents associated with P.O. V4105542 required the vendor to send the Nondestructive Examination (NDE) records and radiographs with each of the six shipments of pipe spools. However, notations in one of the procurement documents for each of the six shipments characterized the required radiographic film as "paper." This may have led AP&E and SCE's QC receiving inspectors to conclude that radiographs were not required to be shipped with the pipe spools.

Since the AP&E manufacturer's code data reports and radiograph reader sheets could be found for the six shipments of pipe spools and none of the radiographs could be retrieved, it is assumed that AP&E did not send the radiographs with the six shipments. Therefore, SCE postulates that a personnel error on the part of SCE's Quality Control (QC) receiving inspectors resulted in the failure to reject the shipments that did not include the radiographs.

2. Corrective steps that have been taken and the results achieved.Procedure Revision

Procedure improvements were made on November 6, 1991, to Exhibit C in Quality Control Instruction G007, "Quality

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Control Inspection, Planning, and Receiving Guidelines," to provide added assurance that radiographs are identified and forwarded to the Document Control Center for permanent retention.

Review of Weld Records

A review of the following AP&E supplied ASME records for the welds associated with the six shipments of pipe spools verified that the pipe spool welds for all six shipments were radiographed and met all ASME Section III Code requirements:

- Radiographic Examination Detailed Procedure and Report (Reader Sheets)
- NPP-1 Code Data Reports (the manufacturer's Report For Fabricated Nuclear Piping Subassemblies)

In addition, SCE reviewed the Editions and Addenda to the ASME Section III Code from the 1974 Edition, Summer 1974 Addenda to the present. This included a review of paragraph NCA-4134.17 which deals with the retention requirements of Quality Assurance records. Applicable ASME Section XI Code requirements were also reviewed as well as ASME Code interpretation III-1-90-23.

Although early versions of the Code required radiographs to be permanent records, the 1980 and 1986 editions of the Code do not require that radiographs be retained as permanent records unless the radiographs are used in ASME Code Section XI applications. SCE uses ultrasonic testing (UT), not radiographs, to satisfy the applicable inservice requirements in Section XI.

Based on this review of the ASME Code and since the piping spools were supplied with sufficient quality documentation to subsequently demonstrate compliance with the ASME Code requirements, additional radiography is not warranted or planned.

Review of Supplier Qualifications

SCE reviewed its supplier qualification records for AP&E's Quality Assurance (QA) Program which controlled the fabrication and shipment of the pipe spool pieces. The review verified that AP&E's QA Program was fully qualified and AP&E held a valid ASME Certificate. Consequently, records supplied by AP&E, including the ASME records supplied with the pipe spool pieces, are considered to be valid Quality Assurance records.

Review of AP&E Purchase Orders

The inability to locate the radiographs for AP&E supplied items is limited to P.O. V4105542. P.O. BSO-555-B is the only other order under which AP&E supplied items to San Onofre. It did not involve any welding or radiography.

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3. Corrective steps that will be taken to avoid further violations.

New Procedures

A new procedure will be issued by July 31, 1992, to provide specific controls for obtaining ASME Code required radiographs from vendors when it is identified they are going out of business or no longer intend to retain the radiographs for SCE in accordance with their approved record retention program.

Enhancement of Procurement Documents

Active procurement documents involving ASME Section III items will be enhanced, as appropriate, to more clearly state that radiographs are required to be shipped with the orders. This will be completed by March 15, 1992.

4. Date when full compliance was achieved.

After repeated attempts to locate the radiographs, no expectations exist for the radiographs ever being retrieved. However, the radiographs are not needed for ASME Section XI inservice inspections. In addition, the ASME records for the welds show that the welds were radiographed and the welds met all ASME Section III Code requirements, therefore, additional radiography is not warranted or planned.

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JCB

The enclosure to Mr. Zimmerman's letter dated November 19, 1991, states in part:

- "C. 10 CFR Part 50.9 requires that information provided to the Commission by a licensee to satisfy a regulation shall be complete and accurate in all material respects.

On June 26, 1991, Southern California Edison Company submitted a request to the Commission for relief from ASME Section XI Code requirements using as the basis for relief the following statement: '... The required examination for pressure-retaining welds in Code Categories B-F, B-J and C-F was a full volumetric examination, with an additional surface examination specified only for dissimilar metal welds. As a result, piping welds in Code Categories B-F, B-J and C-F were not prepared for surface examination ... Significant additional time in the radiation environment would be required to grind and surface condition the welds for surface examinations ...'

"Contrary to the above, the licensee's June 26, 1991 submittal was inaccurate in that the welds in Code Categories B-F and B-J were surface prepared during construction in accordance with ASME Section III, the original construction code for San Onofre Unit No. 2.

"This is a Severity Level IV violation, Supplement I."

RESPONSE TO ITEM C

1. Reasons for the Violation.

As a result of telephone discussions with the NRC on August 5, 1991, prior to the entrance meeting conducted for the NRC NDE Mobile Laboratory Inspection on August 6, 1991, and subsequent review by Southern California Edison (SCE), errors were identified in our June 26, 1991, submittal. Based on our review of these errors it was concluded they were due to a lack of attention to detail during the preparation of the information included in the June 26, letter.

2. Corrective steps that have been taken and the results achieved.

Providing incorrect information to the NRC is not acceptable to us and does not meet our expected standards for quality and accuracy. To ensure our standards of quality and accuracy are not compromised in future submittals, we have reemphasized our expectations in this area to the individuals associated with this submittal and with others involved with preparing information for the NRC. In addition, we have taken appropriate disciplinary action in specific response to the errors submitted in the June 26, 1991 letter.

3. Corrective steps that will be taken to avoid further violations.

No further corrective actions are deemed necessary in order to avoid further violations.

4. Date when full compliance was achieved.

Full compliance was achieved on September 24, 1991 when SCE submitted a revised letter restating Relief Request B-7 for the first ten-year interval ISI Program.