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NUCLEAR LICENSING & SAFETY DEPARTMENT

July 6, 1984

U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, N.W.
Suite 2900
Atlanta, Georgia 30323

Attention: Mr. J. P. O'Reilly, Regional Administrator

Dear Mr. O'Reilly:

SUBJECT: Grand Gulf Nuclear Station
Unit 2
Docket No. 50-417
License No. NPF-13
File 0260/16694.4
Violation 417/84-04-01, Failure to
Control Welding in Accordance with
Applicable Specifications,
Criteria, and Other Special
Requirements
AECM-84/2-0013

Our response to NRC Violation 417/84-04-01, Failure to Control Welding in Accordance with Applicable Specifications, Criteria, and Other Special Requirements, is as follows:

1. Admission Or Denial Of The Alleged Violation:

MP&L admits to the violation as stated.

2. The Reason For The Violation If Admitted:

The welders had not been properly instructed in the special GE requirements of weld bead width for welding reactor recirculation piping. The welder failed to recognize the need to replace the malfunctioning flow meter.

3. The Corrective Steps Which Have Been Taken And The Results Achieved:

Upon identification of the excessive bead width by the NRC Inspector, Bechtel Field Welding Engineering and Quality Control halted the work on Field Weld No. 31 (Drawing FSK-P-1304-M001.0-C). Nonconformance report NCR 6784 was initiated to track and disposition the cited condition. The NCR also noted an additional weld on the reactor recirculation piping system that was installed by the same welders.

The NCR has been dispositioned "use-as-is" based on the rationale that the heat input at this location of the weld is not considered detrimental to the corrosion resistance at the weld root location.

As a result of the conditions cited by the NRC Inspector, a meeting was held between MP&L, Bechtel, and the NRC Inspector to discuss actions to be taken to resolve the conditions. Agreements were reached that the only concern with the shielding gas condition was the failure of the welder to recognize the need to replace the malfunctioning flowmeter when the malfunction was identified to him. This reasoning is based on the fact that the shielding and purge gases had been verified by Bechtel Field Welding Engineering, Quality Control, and the Authorized Nuclear Inspector earlier on the same day the NRC Inspector observed the violation. It was agreed that the corrective action would be limited to the training as indicated in part 4 of this response.

MP&L QA issued CAR 2090 to track this violation.

4. Corrective Steps Which Have Been Taken To Avoid Further Violation:

Training was provided to welders, Field Welding Engineers, and Welding Quality Control Engineers. The training addressed welding procedures (Bechtel Specification 9645-M-183.1) and special welding requirements including General Electric requirements for welding reactor recirculation piping.

5. The Date When Full Compliance Will Be Achieved:

Full compliance was achieved on May 23, 1984.

Yours truly,



L. F. Dale
Director

RDC
RDC:dr

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