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NUCLEAR REGULATORY COMMISSION
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OFFICE OF GENERAL
INVESTIGATION & SERVICE
BRANCH

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Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dr. Kenneth A. McCollom
Administrative Judge
Dean, Division of Engineering,
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Oklahoma State University
Stillwater, OK 74078

Dr. Walter H. Jordan
Administrative Judge
881 W. Outer Drive
Oak Ridge, TN 34830

In the Matter of
Texas Utilities Generating Electric, et al.
(Comanche Peak Steam Electric Station, Units 1 and 2)
Docket Nos. 50-445 and 50-446 OC

Dear Administrative Judges:

Enclosed are paragraphs E.1 - E.3 of Part IV of the "NRC Staff Proposed Findings of Fact on Weld Fabrication" which were omitted inadvertently from pages 48-49 of the document submitted to you on September 7, 1984. In addition, our review indicates that paragraph E.19 of Part IV, line 3, contains an incorrect citation. The correct transcript page is 10,286. The Staff regrets any inconvenience caused you by this inadvertent omission.

Sincerely,

Gregory Alan Berry
for
Gregory Alan Berry
Counsel for NRC Staff

Enclosures: As stated

cc w/encls.: Service List

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E. "PLUG WELDING"

E.1. Henry and Darlene Stiner testified that they had made unauthorized "plug welds" to repair misdrilled holes in cable tray and pipe supports. Mrs. Stiner said she made illegal "plug welds" in the turbine building, Tr. 10,628, while Mr. Stiner said he made his "plug welds" in the north cable spreader room and the south yard tunnel. Tr. 10,990-11,005, 11,008-11; see CASE Ex. 919 at 22. According to the Stiners, unauthorized "plug welds" represents a significant safety problem for three reasons: (i) it is made without prior approval from the welding engineering department; (ii) it contains entrapped slag which weakens the weld; and (iii) it is not inspected by QC. Tr. 10,670 (H. Stiner); Tr. 4154 (H. Stiner); Tr. 4219-20 (D. Stiner).

E.2. Section IV, Article QA-492 of the 1983 ASME and Appendix I of the 1975 AWS Code defines a "plug weld" as:

A circular weld made through a hole in one member of a lap or T-joint joining that member to the other. The walls of the hole may or may not be parallel and the hole may be partially or completely filled with weld metal. (A fillet welded hole or a spot weld should not be construed as conforming to this definition).

In 1976 the AWS Code definition of "plug weld" was amended to substitute the term "fusing" in place of the term "joining." Compare 1975 AWS Code, Appendix I with 1975 AWS Code, Appendix I. Accordingly, a "plug weld" is one that join, or fuses, together two separate and distinct pieces of metal. Staff Testimony at 23 (Collins, Smith).

E.3. The "plug welds" allegedly made by the Stiners, however, involved welding on a single piece of metal. See CASE Ex. 919 at 22 (H. Stiner, D. Stiner); Tr. 4220-21 (H. Stiner); Tr. 4154-55; Tr. 10,286

(D. Stiner). Consequently, the welds made by the Stiners to repair misdrilled holes are not "plug welds" as that term is used in either the 1974 ASME or 1975 AWS Code. Rather, welds made to repair misdrilled holes more properly are considered "repair welds." Staff Testimony at 24 (Collins, Smith); see Applicants' Ex. 177 at 34-35 (Baker).

"standing watch to make sure that [a welder] didn't get caught" while performing "illegal work." Tr. 11,481 (Brown).

E.19. Mrs. Stiner stated that she was ordered by her foremen, James Stembridge and Clay Andrews, to make illegal plug welds on fabrication tables in the turbine building. Tr. 10,286 (D. Stiner). This allegation was investigated by both the Staff and the Applicant. In the course of its investigation, Mr. Stembridge confirmed to Applicant that he had directed Mrs. Stiner to weld a piece of angle iron onto a section of a small bore hanger in order to extend the dimension of the hanger. See Tr. 11,781 (Baker); see also Staff Testimony at 28-30 (Gilbert, Taylor). Mr. Hallford, a Brown & Root foreman, observed Mrs. Stiner execute Mr. Stembridge's order and notified a QC inspector named Larry Wilkerson and asked him to investigate. Tr. 11,783 (Baker). Mr. Wilkerson caught Mrs. Stiner in the act of making the improper repair. Id. According to Mr. Baker, Mr. Wilkerson determined that it was not necessary that a non-conformance report (NCR) be written because the hanger was discarded. Tr. 11,783-84. Mr. Stembridge had been appointed foreman shortly before the incident occurred. Tr. 11,781 (Baker). However, as a result of his violation of procedure, he has been stripped of his supervisory responsibilities and demoted back to a craftsman position with the understanding that he has no chance of ever becoming a supervisor again. Tr. 11,786-87 (Baker). The only reason Mr. Stembridge was not terminated was because his work record had been exemplary until that point. Id.

E.29. The Staff has not succeeded in contacting Mr. Andrews, who is no longer employed at CPSES, Staff Testimony at 29 (Taylor), and thus cannot confirm at this time Mrs. Stiner's charge against him. The Staff