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Georgia Power

the southern electric system

NED-84-447

August 21, 1984

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 2900
101 Marietta Street, NW
Atlanta, Georgia 30323

REFERENCE:
RII: HCD
50-366
Inspection Report
84-27

ATTENTION: Mr. James P. O'Reilly

GENTLEMEN:

The following information is submitted in response to Inspection Report 84-27, which concerns the examination conducted by Mr. B. R. Crowley of your office from July 10 to July 13, 1984. One apparent violation was identified.

VIOLATION:

"10 CFR 50, Appendix B. Criterion IX, as implemented by Section 9 of the Hatch Nuclear Plant Quality Assurance Manual, requires that measures be established to assure that special processes, including welding and nondestructive testing are accomplished using qualified procedures in accordance with applicable codes. AWS Code D1.1, the applicable code for welding and inspection of structural steel welds, requires that weld undercut be limited to 0.01 inches maximum for certain applications.

Contrary to the above requirements, special processes were not accomplished in accordance with applicable codes in that on June 22, 1984, visual inspection procedure 1918-V-N001, the applicable procedure for visual inspection of AWS welds, allowed 1/32" maximum undercut for all AWS welds resulting in 133 welds being inspected and accepted to an incorrect acceptance standard. Two of the 133 welds required re-work to bring within requirements.

This is a Severity Level V violation (Supplement I)."

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RESPONSE:

Admission or denial of alleged violation: The violation occurred.

Reason for the violation: In a January, 1984 NRC inspection, Follow-up Item 366/84-03-03 was identified as a result of a discrepancy between the Recirculation Piping Replacement Project (RPRP) specification and the Newport News Industrial (NNI) visual inspection procedure. The RPRP specification required that structural welds be accomplished in accordance with AWS D1.1-1977, which has very stringent undercut requirements (0.010" maximum) for welds where the primary tensile stress is transverse to the weld. The NNI procedure allowed 1/32" maximum undercut for all AWS welds. In response to this item, the NNI general welding procedure was revised to reflect the more stringent requirements, but the visual inspection procedure was not revised. RPRP personnel were aware of the need to revise the visual inspection procedure; however, the revision was withheld because the Architect-Engineer (AE) had been requested to review the undercut requirements for applicability to the work in progress. The AE review resulted in a relaxation of the weld undercut requirements (0.010-1/32", depending on material thickness) based on a later edition of the AWS code.

After the AE review, RPRP personnel failed to revise the affected procedure in a timely manner. They had previously failed to document the decision to continue welding with the knowledge that reinspection could be necessary and did not document the plan of action for reinspection.

Corrective steps which have been taken and the results achieved: The NNI procedure on visual inspection was revised to address the new weld undercut requirements. As a result of this change, 133 welds required reinspection to assure compliance with the new acceptance criteria. Of the 133 welds requiring reinspection, 131 were found acceptable. The other 2 welds required repairs which were made, reinspected, and accepted.

Corrective steps which will be taken to avoid future violations: A review of the RPRP Specification, Revision 10, has been performed. The specification was compared to the applicable NNI procedures to ensure that required information was accurately incorporated into these documents. No areas of non-compliance were found. This review was completed on July 23, 1984.

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RESPONSE: (Continued)

Date when full compliance will be achieved: Full compliance was achieved on June 29, 1984, when the NNI visual inspection procedure was updated with the correct undercut acceptance criteria and the reinspection and repair of affected structural welds was completed.

Please contact this office if there are any questions.

Very truly yours,

L. T. Guwa

L. T. Guwa

JH/mb

xc: J. T. Beckham, Jr.
H. C. Nix, Jr.
Senior Resident Inspector