



The licensee took action to provide preheat for subsequent welds. The inspector witnessed parts of the nondestructive tests performed on the lifting device. He also made selected visual and dimensional examinations of the device and verified they conformed to the drawing No. LM 005/1. The inspector had no further questions concerning this matter at this time.

The inspector noted that workmen were grinding on a valve body to remove liquid penetrant test indications. These indications were found while testing the pipe to valve weld, MCC-101-6/12 FW 7, and documented on Peabody Testing Report PBT-PT-7420. The repairs were being carried out under an In Process Rework Notice (IPRN), No. W-652. The valves are ASME Code valves and should not have rejectable indication when they arrive in the field. Furthermore, if defects are noted in this type of equipment, a Nonconformance Report should be written. It was determined that these valves are not "Q" listed and normally beyond the purview of the NRC. However, the practice of dispositioning potentially harmful defects in ASME Code pressure boundary parts on IPRN in lieu of a Nonconformance Report was cause for further investigation.

A review of the IPRN log revealed that other similar, safety related components have been dispositioned using IPRN's. Specifically, IPRN No. W655, dispositioned 2 rejectable linear liquid penetrant test indications "outside the area of interest" (i.e., the base metal) on the nuclear Class I pipe weld DLA-107-1/16 FW 11.

The Project Special Provisions Notice, SF/PSPG-3.1, Revision 3, "Control of Nonconforming Items", paragraph 3.1.5, requires that, "If a deficiency to the code requirements is identified within the code boundary of an ASME item, it shall be controlled by the use of nonconformance reports". The failure to disposition nonconforming conditions on ASME III Code base materials in accordance with the foregoing Project Special Provision is contrary to 10 CFR 50, Appendix B Criterion V and an item of noncompliance. (352/81-01-04)

3. Licensee Action on Previous Inspection Findings

(Closed) Unresolved Item (352/79-11-05) Storage requirements for emergency diesel generators. Two aspects of generator storage were not adequately addressed in the storage instructions: (1) The energizing of alternator space heaters and (2) periodic test meggering of the windings.

A review of the electrical quality control records for maintenance and storage disclosed that periodic meggering of the fields and armatures of the generators is being accomplished. A computer card for each generator is printed out each test period. The meggering records were verified for emergency diesel generators 2AG501 and 2BG501 for the time periods