



2. Plant Tours (Unit Nos. 1 & 2)

Periodically during the inspection, tours were made of the Unit Nos. 1 and 2 primary reactor containments, the reactor buildings, the control structure, and surrounding yards and shops. The inspector examined completed work, work in-progress, quality control activities, and equipment storage, handling, and maintenance. He discussed the technical aspects of the work with craftsmen, supervisors, and engineers to assure work was being performed in accordance with requirements.

During a tour of the control structure, the inspector observed a cable tray (1AG015), gutter (1CG002), and conduit (1CH036) installation in the cable spreading room that may not satisfy established separation criteria. The cable tray and gutter will house different divisions of 1E cables. They are currently 1" apart vertically. A cable exits from the top of the gutter and enters the conduit. This will put the cable between enclosed raceways, the cable tray and gutter. The cable will travel approximately 6" in air before entering the open end of the conduit. This kind of installation does not appear to be permitted by IEEE-384 or the licensee's specification. The licensee currently plans to verify cable separation compliance by final inspections. This item is unresolved pending the establishment of methods to make this and similar installations acceptable (352/82-03-01).

The remote shutdown panel 10C201 has an open bottom which provides communication between panel sections and divisions. This does not appear to satisfy IEEE-384, paragraph 5.6.6 and 10CFR50, Appendices A and R, for fire separation. This item is unresolved pending verification that the appropriate fire protection design criteria have been satisfied. (352/82-03-02)

3. Previous Inspection Findings

(Open) Noncompliance (81-16-01)

Reference: Inspection Reports 81-16 and 81-17

The main steam isolation valve body castings do not appear to satisfy the ASME Draft Code for Pumps and Valves (DCPV). The issues involved and updated information are as follows:

- (1) The welding procedure was not qualified for the post weld heat treatment (PWHT) temperature range used. The DCPV, Section 314.1.6(c) requires that repair welding procedures be qualified in accordance with the ASME IX Code. The ASME IX Code, Section Q-11, paragraph V-6, requires that the welding procedure be requalified if there is, "a change in the heat treating temperature..." The Qu ker Alloy Procedure, QAP-49D, for repair welding was qualified for a minimum PWHT temperature of 1100°F. That procedure also limits PWHT temperature to a maximum of 1300°F. The valve casting repair welds were PWHT/tampered at 1340°F.

- (2) Nondestructive testing was performed before heat treatment. The DCPV, Section 314, requires, "Non-destructive examinations... shall be performed after any heat treatments required by the material specification." The valve was normalized on 12/20/71, radiographed on 1/18/72, and tempered on 2/12/72.

The foregoing items are contrary to 10 CFR 50.55a and a violation.

- (3) Repairs and heat treatments were not performed sequentially in accordance with the procedure. The licensee produced an Audit Finding Sheet, AF No. 13, dated March 21, 1973, which shows that the licensee's audit program identified that Quaker Alloy Casting Company's repair welding procedure was not qualified for the thickness range for which it was being used. Based on this finding and subsequent to fabrication, the casting manufacturer appended a Procedure Qualification Record (PQR) to "Repair Welding Procedure for Carbon Steel Castings", QAP 49D. This would mean that the May 7, 1971, revision was in effect at the time of manufacture. The sequential requirements were not imposed in this revision. This matter is resolved.
- (4) Because of the number and apparent severity of the unresolved items associated with this finding, it appeared that there was a significant breakdown in the licensee's quality assurance program. It does not appear now that this is the case with the satisfactory resolution of all but two items. This matter is resolved.

(Open) Noncompliance (352/81-17-02)

The review of Quality Control Inspection Record C-1416-W-1 disclosed that hold point inspections of full penetration groove weld preheat and interpass temperature, paragraph 2.4.a had not been performed for welds FPGW 17, 18, 19, 32, 33, 36, 37, 38, 43, 44, 45, 46, and 47. Project Special Provision Notice PSP G-6.1, Revision 3, "Quality Control Inspection Plans", paragraph 3.1.5, states that inspection hold points are mandatory and work shall not proceed beyond where the designated activity is no longer inspectable. This is a violation.

#### 4. Licensee's Action on IE Bulletins

The inspector reviewed the licensee's program for processing IE Bulletins. He examined the documentation supporting the status and/or completion by Philadelphia Electric Company of actions to satisfy the NRC requirements. He sampled various documents to verify compliance with the licensee's procedure for processing IE Bulletins, Appendix X of the Quality Assurance Plan.