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Georgia Power

the southern electric system

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United States Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 2900
101 Marietta Street, Northwest
Atlanta, Georgia 30323

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Reference: 50-424/84-30, 50-425/84-30

Attention: Mr. John A. Olshinski

The Georgia Power Company wishes to submit the following information concerning the violations discussed in your inspection report 50-424/84-30 and 50-425/84-30:

Violation 50-424, 425/84-30-01, "Failure to Incorporate Corrections in Revisions of Design Drawings" - Severity Level IV.

This violation identified three Drawing Change Notices which were not properly incorporated into design drawings. The specific discrepancies cited in the NRC inspection report include:

<u>Drawing Number</u>	<u>DCN Number</u>	<u>FCRB Number</u>
MO1G-S93-R5	11	5415
MO1G-S95-R5	29	7663
MO1G-S95-R5	19	6968

Georgia Power Company offers the following response pursuant to the criteria of 10 CFR 2.201:

1. Georgia Power Company acknowledges the violation as identified in the NRC inspection report with one point of clarification. Drawing Change Notice (DCN) 12 to drawing MO1G-S93-R5 rather than (DCN) 11 was not incorporated. DCN 11 was incorporated on revision 5.
2. In the cases of DCN No. 12 to drawing MO1G-S93-R5 and DCN No. 29 to drawing MO1G-S95-R5, failure to properly incorporate all changes in the design drawings is attributed to inadvertent oversight by the draftsmen and checkers.

In the case of DCN No. 19 to drawing MO1G-S95-R5, incomplete incorporation is attributed to a lack of clarity in the Field Change Request.

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3. Drawings M01G-S93 and M01G-S95 have been thoroughly reviewed and revised to fully incorporate the three DCN's in question. Revision 6 of M01G-S93 was issued on December 12, 1984. Revision 6 of M01G-S95 was issued on December 10, 1984.

In addition, all other DCN's incorporated under Revision 5 of the two respective drawings were reviewed to verify proper incorporation of all changes. No additional discrepancies were identified.

4. A system has been established to monitor the incorporation of DCN's on a continuing basis to maintain the proper quality level. We are also reviewing the root cause of lack of DCN incorporation in order to identify the proper controls to eliminate future errors.
5. All corrective actions relative to this violation will be accomplished upon completion of the training session mentioned above.

Violation 50-424, 425/84-30-02, "Failure to Follow Nonconformance Procedure" - Severity Level IV.

This violation identified a failure to secure a hold tag adjacent to the area of a cracked weld (P119 to P120) on pipe rack R0001 (R001 in the NRC inspection report is in error) in the Unit 1 Containment Building. Further, the toe of the weld had been ground while in QC hold status. Georgia Power Company offers the following response pursuant to the criteria of 10 CFR 2.201:

1. Georgia Power Company denies the alleged violation.

The cracked weld, P119 to P120, on pipe rack R0001 was discovered during the evening shift of October 31, 1984, and was placed on verbal hold by Pullman Power Products QC until the discrepancy could be evaluated and the required paperwork could be processed. This work was not completed before the shift ended; therefore, it was completed the following morning (November 1, 1984) by the next shift. A Deviation Report (No. 7078) was initiated for the cracked weld, P119 to P120, on pipe rack R0001 during the "A" shift of November 1, 1984. Hold tag No. 6791 was placed adjacent to the subject weld at that same time.

Prior to initiating the Deviation Report, very light grinding and an informational PT and MT was performed at the toe of the weld under the direction of Pullman Power Products QC to determine the significance and extent of the crack indication. This was necessary in order to accurately report the nonconformance to engineering through the Deviation Report. Light grinding of apparently nonconforming welds for information and evaluation purposes is allowed by the Pullman Power Products NDE procedures.

The restriction in Pullman Power Products procedure XV-2 against "further processing" of items on hold refers to production-oriented work and not to light grinding of crack indications performed under QC direction for the purpose of obtaining additional information for the Deviation Report.

Violation 50-424, 425/84-30-03, "Failure to Adequately Control Welding" - Severity Level IV.

This violation cites the following two examples of failure to establish adequate measures to control welding:

1. Welder RC1 listed in quality records for final fit-up of the original B1 to B2 weld on Rack R0003 (R003 in the NRC inspection report is in error) had not been employed on the site at the February 1, 1984, fit-up date.
2. Quality data for the P119 to B3 weld on Rack R0001 (R001 in the NRC inspection report is in error) indicated that 3/32-inch diameter E7018 electrodes from lot JJ009 had been used for final fit-up on May 15, 1984, and the completed weld accepted on September 11, 1984. No electrodes with this control number had been received on the site.

Georgia Power Company offers the following response pursuant to the criteria of 10 CFR 2.201:

1. Georgia Power Company denies the alleged violation.

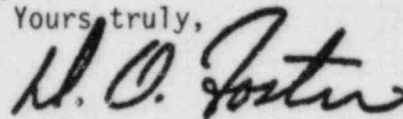
Following the NRC inspection, Georgia Power Company and Pullman Power Products conducted a thorough review of the quality assurance records referenced in the NRC inspection report as well as other documentation relative to the work involved in the two examples above. The records reviewed were those contained in the Georgia Power Company quality assurance records vault. The results of this review is detailed below for each of the cited examples.

- a. The process sheet for pipe rack R0003 was closely examined. The entry on the process sheet for the B1 to B2 groove weld clearly shows that the fit-up was performed on February 1, 1984, by welder RZ1 rather than RC1 as cited in the NRC inspection report. The welding material issuance record for this work was also examined. The rod ticket clearly shows that the welding electrodes were issued to welder RZ1 on January 31, 1984. For added assurance, the weld itself was examined and found to be stamped with welder symbol RZ1. A review of the qualification records for welder RZ1 determined that he was fully qualified to perform this work.
- b. The process sheet for pipe rack R0001 was closely examined. The entry for the P119 to B3 weld shows that the work was

performed on May 15, 1984, by welder PG3. The rod ticket associated with this work clearly shows that two pounds of 3/32 inch E7018 electrodes from control no. JJ099, rather than JJ009 as cited in the NRC inspection report, were issued to welder PG3 on May 14, 1984. The certified materials test report for electrode control no. JJ099 was examined and it was determined that this material was properly qualified.

These responses contain no proprietary information and may be placed in the NRC Public Document Room.

Yours truly,



D. O. Foster

REF/DOF/tdm

Attachments

xc: U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, D. C. 20555

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J. T. Beckham	W. T. Nickerson	E. L. Blake, Jr.
R. A. Thomas	D. R. Altman	(Shaw, et. al.)
D. E. Dutton	D. L. Kinnsch (BPC)	J. E. Joiner
W. F. Sanders (NRC)	J. L. Vota (W)	(Troutman, et. al.)
R. H. Pinson	L. T. Gucwa	D. C. Teper (GANE)
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