



GULF STATES UTILITIES COMPANY

POWER PLANT STATION POST OFFICE BOX 290 ST. FRANCISVILLE, LOUISIANA 70775
AREA CODE 504 835-5194 340-8831

September 4, 1992

RBG- 37,453
File Nos. G9.5, G15.4.1

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

Gentlemen:

River Bend Station - Unit 1
Docket No. 50-458/92-21

Pursuant to 10CFR2.201, this letter provides Gulf States Utilities Company's (GSU) reply to the Notice of Violations in NRC Inspection Report No. 50-458/92-21. The inspection was conducted by Mr. W. M. McNeill on June 8-12, 1992, of activities authorized by NRC Operating License NPF-47 for River Bend Station - Unit 1 (RBS).

Should you have any questions, please contact Mr. L. A. England at (504) 381-4145.

Sincerely,

W. H. Odell
Manager - Oversight
River Bend Nuclear Group

LAE/PDG/FRC/AS/DLA/DNL/GM/pj

Attachments

cc: U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, TX 77011

NRC Resident Inspector
P.O. Box 1051
St. Francisville, LA 70775

9209140282 920904
PDR ADJCK 05000458
G PDR

JEO1

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

STATE OF LOUISIANA)
PARISH OF WEST FELICIANA)
In the Matter of)
GULF STATES UTILITIES COMPANY)
(River Bend Station - Unit 1)

Docket No. 50-458


AFFIDAVIT

W. H. Odell, being duly sworn, states that he is a Manager-Oversight for Gulf States Utilities Company; that he is authorized on the part of said company to sign and file with the Nuclear Regulatory Commission the documents attached hereto; and that all such documents are true and correct to the best of his knowledge, information and belief.



W. H. Odell

Subscribed and sworn to before me, a Notary Public in and for the State and Parish above named, this 4th day of September, 1992. My Commission expires with Life.



Claudia F. Hurst
Notary Public in and for
West Feliciana Parish, Louisiana

ATTACHMENT 1

REPLY TO NOTICE OF VIOLATION 50-458/9221-01 LEVEL IV

REFERENCE

Notice of Violation - Letter from A. B. Beach to J. C. Deddens, dated August 7, 1992.

VIOLATION

Criterion VII of Appendix B to 10 CFR Part 50 and the licensee's approved quality assurance program, Revision 4 dated August 1991, require that measures shall be established to assure that purchased material conforms to the procurement documents.

Reactor vessel feedwater nozzle safe-end replacement material was required by Purchase Order (PO) 91-J-73927 to be supplied in accordance with ASME Code Section III, Class 1, 1986 Edition.

A 12-inch, Schedule 80, SA-234 WPC elbow was required by PO 91-J-73927 to be supplied in accordance with ASME Code Section III, Class 1, 1986 Edition.

Contrary to the above, on June 10, 1992, the inspector observed two instances where the established measures did not assure that purchased materials conformed to the procurement documents.

1. The reactor vessel feedwater nozzle safe-end replacement material was subsequently received and accepted, although the mechanical testing of the material performed by the manufacturer did not conform to the applicable specimen location requirements for quenched and tempered materials contained in paragraph NB-2223 of the ASME Code Section III, Class 1.
2. The elbow material was subsequently received and accepted, although the elbow contained areas where the wall thickness was below minimum ASME Code requirements.

REASON FOR THE VIOLATION

As part of the repair of a feedwater nozzle to safe-end weld during the fourth refueling outage (RF4), Gulf States Utilities Company (GSU) purchased a feedwater nozzle safe-end and a feedwater piping elbow. Both parts were purchased under GSU Purchase Order (PO) 91-J-73927 from a supplier holding a valid ASME certificate of authorization. Both parts were specified, among other requirements, to meet ASME Code Section III, Class 1, 1986 Edition. In addition to the PO requirements, the supplier was audited on April 30 through May 2, 1991. The audit included a review of the suppliers controls over sub-tier suppliers. This audit ensured that sub-tier suppliers were properly audited under the primary supplier's QA program. When the materials were shipped to GSU, the supplier did provide a certificate of conformance that certified the materials to meet the specified requirements including ASME III, 1986 Edition and ASME II, 1986 Edition.

Based on standard receipt inspection and certification by an ASME certificate holder, the subject materials were accepted by GSU. The minimum wall thickness violation for the elbow was not identified at receipt inspection because no wall thickness

measurements were required. GSU relied on the supplier to certify these requirements. However, the supplier failed to ensure that wall thickness requirements were met. Subsequent thickness measurements performed by GSU found that certification was in error.

In a similar manner, the safe-end was accepted at receipt inspection based upon certification by the ASME certificate holder that the material met specified requirements. The certification that GSU relied on was subsequently found to be in error as described in the notice of violation.

In both cases, the cause of the violation was the failure of the ASME certificate holder to ensure conformance to specified requirements and thus to issue a valid certification for the material. GSU relied on this certification and confidence gained through audit of the supplier to show compliance with specified ASME requirements.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

Once the minimum wall violation on the elbow was identified by GSU, the elbow was returned to the supplier for repair. The elbow was not used in the repair of the feedwater nozzle to safe-end weld. Currently, the repaired elbow has not been accepted by GSU. GSU issued a 10 CFR 21 report on June 18, 1992 reporting the minimum wall violation.

The safe-end material was accepted by GSU and used in the repair of the feedwater nozzle to safe-end weld. The acceptance was based on additional mechanical testing performed by the supplier. This additional testing was reviewed to ensure conformance to ASME Code requirements prior to installation.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER FINDINGS

GSU will continue to ensure conformance to ASME Code requirements by specifying that materials meet applicable code requirements and that ASME materials are supplied by qualified and audited ASME certificate holders. In addition, the engineering procedure for establishing technical and quality requirements in procurement documents (EOP-EQ-01) will be revised to provide the following specific guidance when procuring ASME large bore (2-1/2" and larger) elbows. This guidance will ensure that the following directions are established in POs for these elbows:

1. The ASME supplier shall verify the wall thickness on the outer radius of the bends.
2. The supplier is to furnish evidence of compliance with this requirement either through a statement which attests to the verification of acceptable wall thickness for the elbows or through wall thickness reports for the elbows.
3. QC is to verify that the supplier has furnished evidence that wall thickness verifications have been acceptably performed on the elbows provided. In lieu of this acceptable evidence, QC shall perform on site verifications of the wall thickness on the outer radius of the bends.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The safe-end has been found to be in compliance with ASME requirements and has been installed. The replacement elbow was repaired, but has not been found to be in compliance with ASME requirements, and thus has been rejected by GSU. The materials actually used in the repair of the feedwater nozzle to safe-end weld are in conformance with requirements related to those identified in the notice of violation.

ATTACHMENT 2

REPLY TO NOTICE OF VIOLATION 50-458/9221-02 LEVEL IV

REFERENCE

Notice of Violation - Letter from A. B. Beach to J. C. Deddens, dated August 7, 1992.

VIOLATION

Criterion IX of Appendix B to 10 CFR Part 50 and the licensee's approved quality assurance program description, Revision 4 dated August 1991, require that measures shall be established to assure that special processes, including welding, are controlled and accomplished using qualified procedures in accordance with applicable codes.

Procedure No. RBNP-042, "River Bend Station ASME Section XI Program Organization, and Responsibilities," Revision 4, paragraph 5.6.1 requires that welding procedure specifications be qualified in accordance with the requirements of ASME Code Section IX.

Contrary to the above, on June 8, 1992, the inspector observed that the welding procedure specification (WPS) for welding the reactor vessel feedwater nozzle safe-end replacement material, WPS-W3-16-AGT, Revision 0, was not qualified in accordance with the requirements of ASME Code Section IX. Specifically, supplementary essential variables QW-405.2 and QW-409.1, pertaining respectively, to a change in position to the vertical position uphill progression and an increase in heat input over that qualified, were not supported by appropriate procedure qualification records.

REASON FOR THE VIOLATION

Welding procedure specification WPS-W3-16-AGT, Revision 0, was qualified in both the 1G (downflat) and 3G (vertical-up) positions with impacts (supplementary essential variable). The maximum heat input from the different positions qualified were different values with the downflat 1G position qualification having the maximum heat input. Paragraph QW-409.1 of ASME Section IX discusses "an increase in heat input" not a change in position. This maximum heat input from the 1G position was used to establish the welding parameters set in Revision 0 of WPS-W3-16-AGT. However, further discussion with several ASME Section IX code committee members has led to the conclusion that the 3G (vertical-up) position must be used for maximum heat input.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

An additional procedure qualification record (PQR) was performed in the 3G (vertical-up) position qualifying the maximum joules heat input that was originally qualified in the 1G (downflat) position. This additional qualification was added to WPS-W3-16-AGT and issued as Revision 3 on June 12, 1992. This PQR with the maximum heat input in the 3G position verified that the impact tests met Code requirements.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER FINDINGS

Corrective steps have been taken by qualifying additional PQRs to the WPS. This places the WPS in full compliance with ASME Code Section IX requirements. All other WPSs with impacts within the ASME System have been reviewed to assure compliance to the Code requirements.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance with Code requirements was achieved by Revision 3 to WPS-W3-16-AGT on June 12, 1992.