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MIDDLE SOUTH UTILITIES SYSTEM

October 17, 1984

W3P84-2858
Q-3-A35.07
3-A1.01.04

Mr. John T. Collins
Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76012

Dear Mr. Collins:

Subject: Waterford 3 SES
Docket No. 50-382
POTENTIALLY REPORTABLE DEFICIENCY NO. 179
LP&L (Maintenance) Welding Program Deficiencies
Interim Report

References: 1. Telecon - C.N. Hooper (LP&L) to W.A. Crossman (NRC) on September 7, 1984.

2. Telecon - G.E. Wuller (LP&L) to L.E. Martin (NRC) on October 9, 1984.

In accordance with 10CFR50.55(e), LP&L provided telephone notification on September 7 (reference 1) to the NRC of the subject PRD-179 regarding welding program deficiencies. Reference 2 requested an extension for the PRD-179 report.

The following is the initial report, provided as an interim report due to the currently indeterminate safety significance of the deficiency:

Introduction

This interim report is submitted pursuant to 10CFR50.55(e). It describes deficiencies identified through an Operations Quality Assurance Audit of the LP&L (Maintenance) Welding Program.

Description

During an Operations Quality Assurance Audit some programmatic deficiencies were identified in the Waterford 3 Maintenance Department Welding Program.

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The Quality Assurance Audit included a sample of welder qualification documentation which was reviewed for code compliance and some instances were identified where documentation of welder past history was insufficient. It was also found that LP&L purchased/contracted testing and test evaluation services from vendors/ subcontractors not listed on the LP&L Qualified Suppliers List. In addition, the welder qualification procedure did not include all variables specified in Section IX and the procedure did not explicitly specify the method of controlling welder activities within the welder qualification limits, such as thickness ranges, pipe diameter limits, and position limits.

Safety Implications

The LP&L Maintenance Welding Program inadequacies render the quality of welds performed on systems necessary for safe shutdown or mitigation of an accident indeterminate.

Corrective Actions

The Waterford 3 Maintenance Department has compiled a listing of 232 welds performed by LP&L welders and it was determined that approximately 75 of the welds are in safety-related systems. Plant Staff is presently performing an evaluation of weld documentation to determine if rework is necessary. Plant Engineering is currently in the process of reviewing and updating procedures as applicable to verify qualification of all affected procedures. The subcontractors/QSL problem was determined to be an administrative problem and has since been resolved and evaluated as non-significant.

The significance of the potentially reportable deficiency will be determined upon the evaluation which is scheduled to be completed by the end of October at which time a written report will be submitted to the NRC.

Very truly yours,

K W Cook

K.W. Cook
Nuclear Support & Licensing Manager

KWC:BGM:GEW:sms

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