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**Detroit
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October 17, 1984
EF2-69658

Mr. James G. Keppler
Regional Administrator
Region III
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

Reference: (1) Fermi 2
NRC Docket No. 50-341

(2) Letter, D. A. Wells to J. G. Keppler,
October 10, 1983, EF2-65287

Subject: Final Evaluation of 10CFR50.55(e) Item 100
"Unacceptable Contractor Practice Regarding
Ultrasonic Testing of Flued Head Structures"

Detroit Edison has completed its investigation of Item 100 and has determined that it is not reportable under 10CFR50.55(e). This item concerned unacceptable contractor practices regarding the ultrasonic testing of flued head structures. Item 100 was originally reported as a potential deficiency on September 19, 1983, and was subsequently documented in Reference (2).

Investigation by Wismer and Becker Quality Assurance and their Level III nondestructive testing examiner (NDE) determined the ultrasonic test problems were limited to flued head structure anchor blocks to which plate had been added to strengthen the structures. Detroit Edison Quality Assurance concurred with this conclusion. The specific problems identified were:

- o The 1-1/2 inch anchor block welds (with plate added) had been examined using an angle beam transducer. The angle beam transducer was found not to provide 100% coverage on this size anchor block weld due to the added plate.

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- o No evidence could be found qualifying the 3-1/2 inch anchor calibration block as an equivalent ASME calibration block. This anchor calibration block had been used in the examination of some of the 3-1/2 inch anchor block welds.
- o The ultrasonic examinations on several flued head anchor blocks were incomplete and tests were not performed on all of the anchor block welds.

At the time this item was reported in Reference (2), the work on the flued head structure anchor blocks had not been completed. Because of other priorities, work on these structures was deferred for over a year. Since work and testing was not complete, the Wismer and Becker NDE Level III examiner and Quality Assurance review of the documentation for final acceptance had not been accomplished. This review would have detected any rejected welds not repaired, work not completed, or the use of inappropriate testing techniques. Detroit Edison has concluded that the delay between start and completion of the work on flued head structures and the NDE Level III and QA reviews of ultrasonic testing does not constitute a significant breakdown in the quality assurance program. Therefore, this item is not reportable under 10CFR50.55(e).

The actions taken to resolve the specific concerns identified were:

- o New ultrasonic test technique sheets were developed to qualify the 0° transducer ultrasonic testing techniques for the flued head structure anchor block welds with the additional plate. This technique afforded 100% coverage for the modified flued head structures.
- o The insitu 3-1/2 inch anchor calibration block has been qualified as an equivalent ASME calibration block. Any examinations conducted using this 3-1/2 inch anchor calibration block, prior to its qualification, are acceptable.
- o An insitu anchor calibration block was qualified for the 1-1/2 inch block welds. All previously examined flued head structure anchor blocks, which contained the additional plate, were re-examined using this insitu anchor calibration block and the 0° transducer technique.

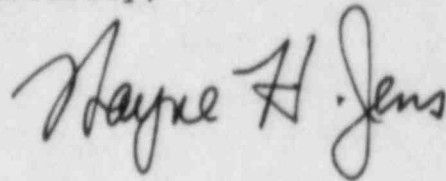
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- o The Wismer and Becker NDE Level III examiner and their Quality Assurance reviewed and accepted ultrasonic test reports of flued head structure anchor block field welds.
- o Detroit Edison Nuclear Quality Assurance performed a final review of ultrasonic test reports, weld repair forms and travelers that documented action taken. This review is documented on a final surveillance report QSR No. S-QS-84065.

During ultrasonic testing of field welds on flued head structures, a shop weld was inadvertently ultrasonically examined and found to be rejectable. This item is potentially reportable under 10CFR50.55(e) and is being tracked as Item 139.

If you have questions concerning this matter, please contact Mr. Lewis Bregni, (313-586-5083.)

Sincerely,



cc: Mr. P. M. Byron
Mr. R. C. DeYoung
Mr. R. C. Knop