VIRGINIA ELECTRIC AND POWER COMPANY

RICHMOND, VIRGINIA 23261

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W. L. STEWART
VICE PRESIDENT
NUCLEAR OPERATIONS

November 9, 1984

Mr. James P. O'Reilly
Regional Administrator
Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, Suite 2900
Atlanta, Georgia 30323

Serial No. 606
NO/DJF:acm
Docket Nos. 50-338
50-339
License Nos. NPF-4
NPF-7

Dear Mr. O'Reilly:

We have reviewed your letter of October 4, 1984, in reference to the inspection conducted at North Anna Power Station between September 11, 1984 and September 13, 1984 and reported in IE Inspection Report Nos. 50-338/84-34 and 50-339/84-34. Per a telephone conversation on October 31, 1984, between Mr. David Fortin (Vepco) and Mr. Virgil Brownlee (NRC), an extension until November 9, 1984 was granted to respond to the inspection report. Our response to the specific infraction is attached.

We have determined that no proprietary information is contained in the report. Accordingly, the Virginia Electric and Power Company has no objection to this inspection report being made a matter of public disclosure. The information contained in the attached pages is true and accurate to the best of my knowledge and belief.

Very truly yours,

W. L. Stewart

Attachment

cc: Mr. Richard C. Lewis, Director
Division of Project and Resident Programs

Mr. James R. Miller, Chief
Operating Reactors Branch No. 3
Division of Licensing

Mr. M. W. Branch
NRC Resident Inspector
North Anna Power Station

RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT NOS. 50-338/84-34 AND 50-339/84-34

NRC COMMENT:

Paragraph (a)(1) of 10 CFR 50.55(a) requires structures and components be fabricated and inspected to quality standards commensurate with importance of the safety function. ANSI B31.7, paragraphs 1-725.5.3,-727.4,-727.4.2 and Project Operating Procedure 3.1.2, Rev. 2, paragraph 6.5.4 delineate the requirements for maintaining control of welding practices.

Contrary to the above, on September 11, 1984, control over welding was not being maintained in that filler metal stubs were observed scattered around the weld area, debris and water had been allowed to accumulate around the weld area and to a lesser degree inside the valve casing and adjacent piping being welded; lack of fusion and severely discolored/oxidized weld metal was observed on the root of weld FW-4A even though it had been accepted by QC on September 9, 1984.

This is a Severity Level IV violation (Supplement 1).

RESPONSE:

(1) ADMISSION OR DENIAL OF THE ALLEGED VIOLATION:

This violation is correct with regard to the loss of area control. However, the statement concerning the lack of fusion and discoloration on the root of weld FW-4A is not correct. At the time of the inspection, the weld had been completed to the second hot pass. The lack of fusion and discoloration are not unusual during the hot passes and were corrected as prescribed by the governing welding process procedure. In addition, the QC acceptance signature mentioned in the NRC comment was only for the "fit-up" of the valve to the piping. The root pass and subsequent hot passes are normally not inspected if, as in this case, a final radiograph of the entire weld is to be performed.

(2) REASONS FOR VIOLATION:

The reason for the failures to adhere to the welding control practices was personnel error. This was further complicated by the adverse working conditions surrounding the activity.

(3) CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED:

The following corrective actions were completed:

a) Filler metal stubs were found (fire weld stubs), accounted for and properly disposed of.

b) An inspection of other areas in which welding was being performed was conducted with no further discrepancies noted.

c) The water and debris was removed from the area prior to conducting any further welding activity.

d) The visual defects noted were removed by the normal corrective cleaning procedure.

e) The weld was completed, radiographed and found to be acceptable.

f) During the welding process, the QC surveillance activities were increased to at least once per day to verify that the housekeeping requirements were being met, the weld material was being controlled and the welding operation was being performed in accordance with approved procedures. The results of these daily inspections were satisfactory.

g) All pipefitter craftsmen were reinstructed on the requirements in weld material control.

(4) CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

The events leading to this violation are considered to be an isolated occurrence. Therefore, no further corrective actions are warranted.

(5) THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

No further corrective actions are required.