



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV
611 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TEXAS 76011

AUG 31 1987

MEMORANDUM FOR: Robert D. Martin, Regional Administrator
FROM: D. R. Hunter, Chief, Reactor Project Section B
SUBJECT: ASME CODE HYDROSTATIC TEST OF RCS PIPE SUBASSEMBLIES

PURPOSE:

As a followup to our discussion on August 26, 1987, in your office, I indicated that I did not fully understand certain conclusions stated in the Arlotto Report. I indicated that I would perform a review of the issues concerning the deferral of the ASME Code hydrostatic test of the Loop 3 cold leg pipe subassembly at CPSES. The Arlotto conclusions did not fully address the issue, as I understand the matter, from my close involvement at the time of the Region IV inspection efforts (NRC IR 50-445 85-07; 50-446/85-05, draft and final reports.) The conclusions made by the Arlotto report did not support the thought process in 1985 when the inspection effort was performed.

I reviewed a number of reference documents in order to better understand the Arlotto report ~~and~~ conclusions regarding Issue 5 that, "no direct safety significance" and that after considering "worst case" that "recommendations are unnecessary."

BACKGROUND

As a matter of background, Region IV performed inspection of certain activities at CPSES in June 1985 in order to better understand scope of the safety and

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quality issues. The compliance with the ASME Code had not been specifically looked at during previous NRC/TRT activities. It was deemed to be extremely important to review this area. Del Norman was selected to look at this particular area. Based on the NRC inspection activities in mid-June 1985, we found that the licensee had not apparently met the ASME Code requirements relating to the signing of the Code Data Report (NPP-1) and the application of the ASME Code stamp to the hardware prior to the performance of the hydrostatic test. We found little or no plans or correspondence to indicate the responsibilities had been transferred to the installer or that the shop welds or weld repairs were to be observed/inspected during the hydrostatic test. Further, through records review and interviews (including the NRC SRI, Dennis Kelley) we could not establish whether the required inspections were performed in absence of the program, procedures, checklists, or instructions. ~~(or practices.)~~

In fairness to the NRC, the apparent lack of records associated with the specific subassembly was included in the NRC inspection report as URI (445/8507-07; 446/85-05-09.) At that time, the licensee was, as a general rule, given the "benefit of the doubt" and allowed time to recover records needed to show "quality" of an activity in question. However, we had no real assurance the inspections were performed.

On August 27, 1987, I called the C-SES site to establish the status of the URI and confirmed that the item is still open. The NRC apparently has not ~~yet~~ brought this issue to a close after over 2 years have lapsed since the

inspection exit with the licensee. Notwithstanding, the licensee may have performed a planned, comprehensive audit/review of this matter in the interim period and taken adequate actions.

ARLOTTO REPORT

During the review of the Arlotto report and reference documents, it became apparent that the team concentrated on only the narrow, limited matter - the deferral of the hydrostatic testing of the RCS loop 3 cold leg subassembly until the performance of the main RCS hydrostatic test. I cannot comment on why the issue was so limited in scope. The simple deferral of the hydrostatic testing was not the safety issue. However, as the events (the OIA report and reviews) evolved in time (the documentation provided to the Arlotto team from Region IV and no interviews conducted to clarify the issues or to fully understand the issues) it is not surprising that the scope was extremely narrow in this particular instance.

CONCERNS AND SEQUENCE

This is the sequence of events, as I understand them. My concerns were documented in a memorandum to Eric Johnson, dated August 12, 1986, including "Issue 5" in the Arlotto report. As requested by Mr. Johnson, I provided certain information in my August 12, 1986 memorandum, including the specific concern, the facts and regulatory basis, the safety significance, and the proposed disposition of the issue. I also provided a draft written request (under Mr. Johnson's signature) to HQ regarding the acceptability of deferring

the hydrostatic of the cold leg subassembly, the signing of the ASME Code data package (NPP-1) prior to completing the package, and the acceptance criteria and documentation requirements associated with the performance of the hydrostatic test by the manufacturer or the installer. This interpretation was needed because our inspection efforts placed the licensee's program, procedures, and practices (including the lack of records) in question.

Enclosure 1 of my August 12, 1986 memorandum contains the following information:

- Under Concern No. 1 - The information in the cold leg subassembly data package did not adequately address the code requirements-weld and base metal repair inspections performed during a hydrostatic test.
- Under Inspection Facts - The subassembly had been stamped and the hydrostatic test had not been performed. This was noted on the NPP-1 form. (Therefore we didn't know what to expect regarding records of repairs and/or inspections in the NPP-1 provided by the manufacturer.)
- Under Safety Significance - The failure to require these inspections during the performance of the ASME Code hydrostatic and the apparent failure to perform these activities leaves the ASME Code Class piping in question.

- ° Under Disposition of the Issue - Ensure the timely followup of this specific concern by the NRC and the Applicant in a planned, systematic, and complete manner, as appropriate.

Enclosure 8 of my August 12, 1986 memorandum contains the following information:

- ° Guidance concerning the acceptability of the performance of hydrostatic testing of piping subassemblies after installation into the system by the fabricator. Include the question of signing the NPP-1 Form and stamp application prior to the hydrostatic test. Also address the responsibility of the manufacturer's ANI.
- ° Guidance regarding the acceptance criteria and documentation requirements during the performance of the systems hydrostatic test by the manufacturer (shop) or the installer (field.)

It is important to note that, as far as my review could identify, my concerns were not provided to the Arlotto team. Since I wasn't interviewed, there was no way for Arlotto or me to realize that the safety issue as I saw it really wasn't being addressed. This matter (Issue 5) was noted as removed from the NRC Inspection Report 50-445/85-07; 50-446/85-05, without being answered, in an interview by OIA in April 1986, pages 65-72 (Attachment C to the OIA Report.)

INSPECTOR'S CONCERN

A review of the interview of an inspector by OIA, pages 23-24, (Attachment G of the OIA Report) states that the method of performing the hydrostatic test was questioned; however, the records reviewed indicated that the welds and weld repairs may not have been checked as required by the ASME Code.

Further, as requested, the inspector provided his concerns to Mr. Martin/John Davis in early 1987. This information was provided under cover letter to Mr. Davis on January 20, 1987, by Mr. Martin. A review of this information (CPRRG-15, Enclosure 5) and discussions with the inspector revealed, again, the basic safety question was not "adequately" addressed. It is extremely important to realize that the B&R quality assurance procedure (CP-QAP-12.2, Revision 8, paragraph 2.4) addressed vendor components; however, the procedure did not mention piping subassemblies. Again, our inspection effort did not reveal requirements to inspect shop welds or base metal repairs (none noted) and included our discussion with Mr. Dennis Kelley (SRI) who had witnessed part of the hydrostatic test. During the inspection, contacts included the B&R QA Manager, the B&R site QA Manager, and a number of other QA ^{and} B&R technical people. ^{After} about a week of NRC inspection effort the licensee could not explain the situation or present the procedures, checklists, records, or interviews to alleviate our concern ^{regarding} ^{not so} meeting the basic ASME Code requirements.

GENERAL

The Arlotto Report does not adequately address two significant concerns relative to this issue. In the first place the matter does have a direct safety significance since there was little or no evidence (written or oral), regarding the deferred hydrostatic test, that the licensee (or the contractor) understood the ASME Code requirements nor accomplished the required inspections either intentionally or incidentally against some preplanned acceptance criteria (ASME Code requirements). In the second place, under Task 2, section 3.5, of the Arlotto report, the statement is made in part, that considering the "worst case, not hydrostatically test, was subsequently installed...ruptured due to overstress. Therefore, worst case has no safety significance...recommendations are unnecessary." This statement *appears to be* naive at best, and would have been better left out of the report.

CLOSING

Bob, in March 1986, I had indicated to you that, in my opinion, a real problem existed in the DRSP in that findings were not being aggressively pursued. I continue to believe that findings in 1984-1985 were not being handled adequately. This may be a specific example of how significant findings were not being pursued.

May I request that the specific issue regarding the RCS ASME Code hydrostatic

test be reviewed and interviews be conducted with the appropriate persons to ensure the specific safety issue is appropriately addressed. Further, other concerns related to inspections conducted (including NRC IR No. 50-445/85-07; 50-446/85-05) may need addressed. These concerns should be obtained through the reviews and interviews.

REFERENCE DOCUMENTS

Arlotto Report, dated 3/12/87 (CPRRG)

Issue #5 (Appendix A, pgs 3-14 and 3-15; Appendix B, pgs 60-62)

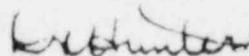
CPRRG-15, Enclosure 5

OIA Report 86-10, dated November 1986

Attachment C

Attachment G

Memorandum For: Eric H. Johnson from D. R. Hunter,
dated August 12, 1986 (Concerns relating
specifically to NRC IR 50-445/85-07;
50-446/85-05, dated February 3, 1986)


D. R. Hunter