

Washington Public Power Supply System

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Docket 50-397

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April 16, 1982
G02-82-385

Mr. R. H. Engelken
U.S. Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 260
Walnut Creek, California 94596

Subject: NUCLEAR PROJECT NO. 2 - CPPR-93
REVISED RESPONSES TO NRC NOTICE OF VIOLATIONS
79-10/01, 79-10/03, 80-09/09, AND 80-08/22

References: a) G02-80-120, dated June 11, 1980
b) G02-80-209, dated September 19, 1980
c) G02-82-319, dated March 11, 1982

Reference a) transmitted the Supply System's response to Notice of Violation 79-10/01 and 79-10/03. Reference b) transmitted the Supply System's response to 80-08/09 and 80-08/22. Reference c) transmitted the Supply System's revised response to 79-10/01, 79-10/03, 80-08/09, and 80-08/22.

Subsequent to the transmittal of these replies, organizational and procedural changes at WNP-2 have occurred which require submittal of revised responses for these four (4) violations. The Supply System committed to provide these responses in NRC Inspection Report 81-22. Attachment 1 completes that commitment.

If there are any questions regarding this letter, please contact Roger Johnson, WNP-2 Project QA Manager, (509) 377-2501, extension 2712.

R. G. Matlock

R. G. Matlock
Program Director, WNP-2

LCF/kd

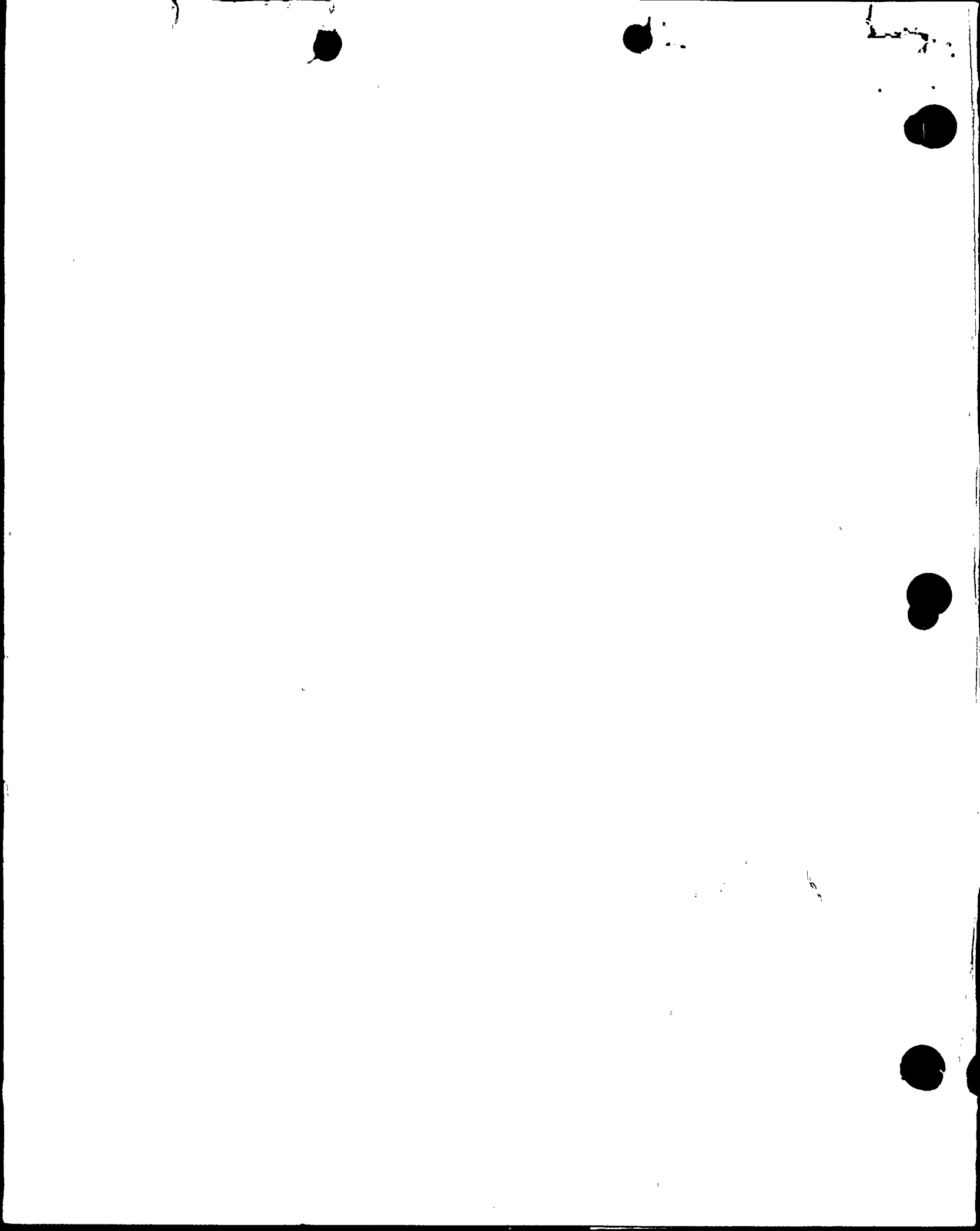
Attachment: As stated

cc: W.S. Chin, BPA - Site
R.A. Feil, NRC Resident Inspector - Site
A. Forrest, Burns and Roe - HAPO
N.D. Lewis, NRC
J. Plunkett, NUS Corp.
R.E. Snaith, Burns and Roe - NY
V. Stello, NRC
RMSF - 917Y

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ATTACHMENT 1

Notice of Violation in letter from R. H. Engelken to R. L. Ferguson, dated August 15, 1980

Appendix A, Item B.3 (80-08/22)

Notice of Violation: Piping isometric drawings SW-290-11.20 and SW-297-8.17 identify that these spools are subject to the requirements of the ASME Boiler and Pressure Vessel Code, 1971 Edition, Section III, Class III and were identified as Quality Class I. The examination requirements and acceptance criteria for welds in ASME Section III, Class III piping, pumps and valves are specified in paragraph ND-5220.

Contrary to the above requirements, the governing acceptance standard identified in Northwest Industrial XRay Liquid Penetrant Examination Reports Nos. 230 and 244, dated July 31, 1975 and August 20, 1975, respectively, was ASME Section VIII. The liquid penetrant examination reports indicated that the results of these examinations performed on pipe spools SW-290-11.20 and SW-297-8.17 were evaluated to the acceptance standards of ASME Section VIII. These standards are less stringent than those required by ASME Section III.

This is a deficiency.

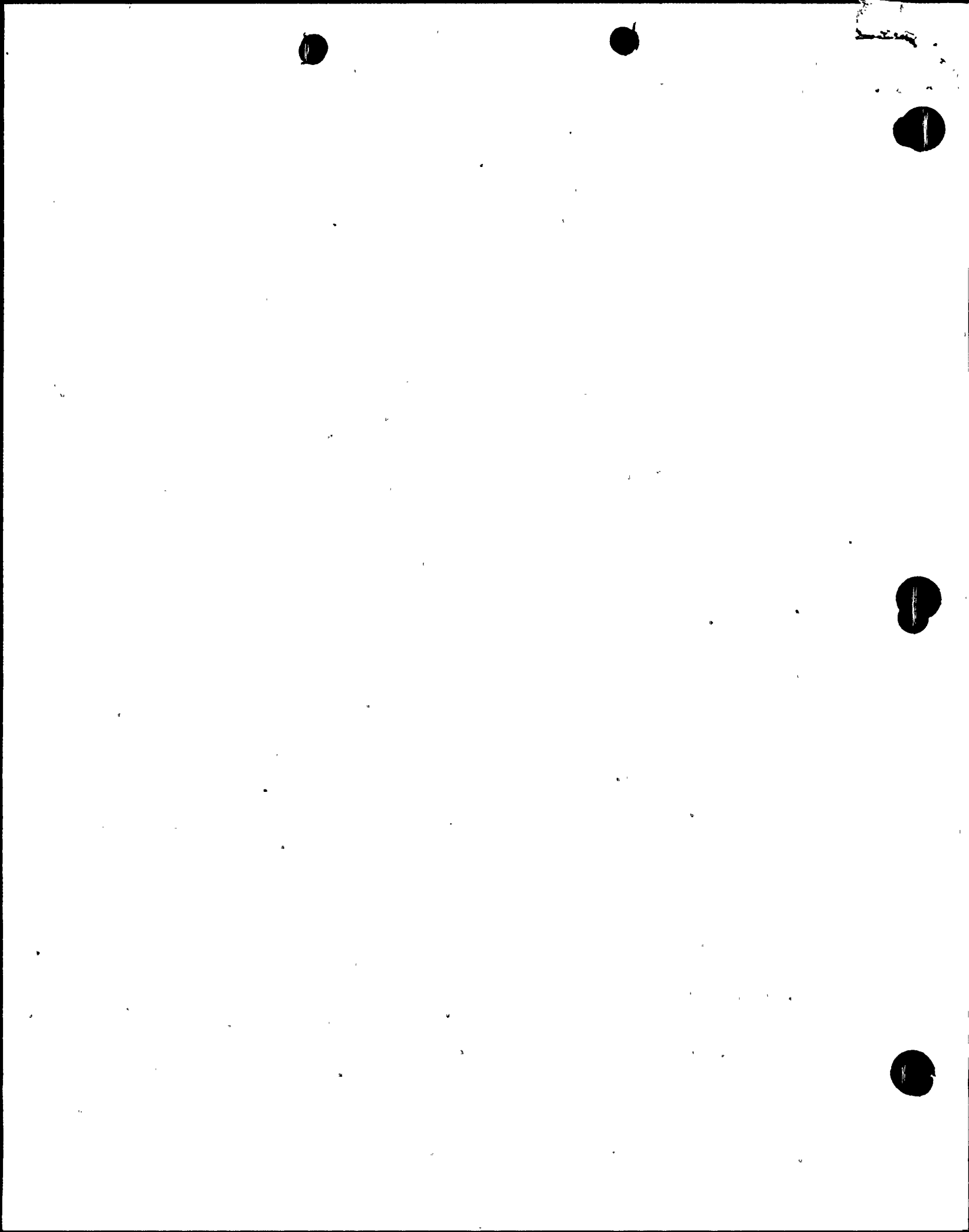
Summary

Due to Bechtel Power Corporation assuming Contract 215 (WBG) System Completion work and associated procedure changes, it is necessary to revise our response.

Actions to Correct Deficiency:

Old Response: Inspection Report No. 6047 was written to document the discrepancy. WBG will review all completed liquid penetrant reports and segregate those reports with the incorrect acceptance standard and document any additional discrepancies on Inspection Reports. These discrepant liquid penetrant reports will be reviewed against the ASME Section III requirements and appropriately dispositioned.

New Response: NCR 6946 has been written to document this discrepancy and has been sent to the Architect Engineer (AE) for disposition. Of the 344 welds identified to date as being examined to ASME VIII requirements, only 8 are ASME Code. The balance of the welds are ANSI B.31.1 and have been dispositioned "accept-as-is" by the AE. Six (6) of the 8 ASME welds have been re-examined using Section III NDE requirements. All of the welds re-examined were found to be acceptable.



Actions to Correct Deficiency:

New Response: (Continued)

The 2 remaining ASME Code welds have signed N-5 data reports on file.

WBG will review all completed liquid penetrant reports and segregate those reports with the incorrect acceptance standard and document any additional discrepancies on inspection reports. These discrepant liquid penetrant reports will be reviewed against the ASME Section III requirements and appropriately dispositioned.

Action to Prevent Recurrence:

Old Reponse: The acceptance criteria for liquid penetrant examinations are delineated in QAP-16. These acceptance criteria conform to ASME Section III requirements, even though QAP-16 references ASME Section VIII in addition to ASME Section III. QAP-16 will be revised to delete reference to ASME Section VIII.

New Response: All future liquid penetrant examinations will be performed by a Bechtel approved subcontractor, using procedures approved by Bechtel Level III NDE personnel. All ASME liquid penetrant examinations for a joint are specified on a Quality Control Inspection Record (QCIR) and is reviewed and approved prior to release for work by Bechtel's Lead Welding Quality Control Engineer in accordance with Bechtel QCI 14631/W-1.00. Also, after the examination is performed, all ASME liquid penetrant reports (QCIR) are reviewed and signed by Bechtel's ANI.

Date of Full Compliance:

Old Response: December 1, 1980

New Response: 90 days prior to Fuel Load

