In your response you [illegible] issue with Violation A and portions of Violations C and D. We have evaluated your responses, re-reviewed our original findings, and held additional discussions onsite regarding Violation A. We conclude the citations are valid, therefore, none of the violations are withdrawn.

Regarding Violation A, our understanding of your corrective action is stated in Attachment A. Attachment A also discusses our basis as to why item b (2) remains a violation. With regard to Violation C (3), we note that your April 18, 1986, response described proposed corrective actions, even though you disputed the citation. We will review these actions during a future inspection. We request that you respond, within 30 days of the date of this letter following the instructions of the original Notice of Violation to Citation D(2). Also, with regard to Violation A please inform us of the date by which your corrective action will be implemented.

Sincerely,

Original Signed By:

Harry B. Kister, Chief
Projects Branch No. 1
Division of Reactor Projects

OFFICIAL RECORD COPY Letter OYC

IE01

JUL 2 1 1986

Docket No. 50-219

GPU Nuclear Corporation
ATTN: Mr. P. B. Fiedler
Vice President and Director
Oyster Creek Nuclear Generating Station
P. O. Box 388
Forked River, NJ 08731

Gentlemen:

Subject: Inspection 50-219/85-35

This letter acknowledges receipt of your letter dated April 18, 1986 that responded to the findings identified in our inspection report 50-219/85-35. Your corrective and preventive actions will be reviewed in a subsequent inspection.

In your response you took issue with Violation A and portions of Violations C and D. We have evaluated your responses, re-reviewed our original findings, and held additional discussions onsite regarding Violation A. We conclude the citations are valid, therefore, none of the violations are withdrawn.

Regarding Violation A, our understanding of your corrective action is stated in Attachment A. Attachment A also discusses our basis as to why item D (2) remains a violation. With regard to Violation C (3), we note that your April 18, 1986, response described proposed corrective actions, even though you disputed the citation. We will review these actions during a future inspection. We request that you respond, within 30 days of the date of this letter following the instructions of the original Notice of Violation to Citation D(2). Also, with regard to Violation A please inform us of the date by which your corrective action will be implemented.

Sincerely,

Original Signed By:

Harry B. Kister, Chief
Projects Branch No. 1
Division of Reactor Projects

OFFICIAL RECORD COPY Letter OYC

IE01

cc w/encl:
M. Laggart, BWR Licensing Manager
Licensing Manager, Oyster Creek
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
State of New Jersey

bcc w/encl:
Region I Docket Room (with concurrences)
Management Assistant, DRMA (w/o encl)
Section Chief, DRP
Robert J. Bores, DRSS

RI:DRP Bateman	RI:DRP Blough	RI:DRS Wiggins	RI:DRP Kister
7/17/86	7/17/86	7/17/86	7/18/86

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07/17/86 IE01

Attachment A

Violation A: This violation was for a partially inadequate corporate welding program. The details section of the report explained that your program is designed to meet the requirements of Section IX but does not address important aspects of AWS D1.1, namely, the AWS essential variable of weld joint geometry. In your response you stated your program was not intended to contain all requirements defined in AWS D1.1 and that you feel your program is adequate to meet the requirements of both ASME Section IX and AWS D1.1. You also reiterated your position that joint geometry is a non-essential variable by ASME Section IX, thereby, making it a non-essential variable for AWS D1.1 work done under the controls of the GPUN welding program.

The facts relating to the particular weld indicated your program did not address AWS D1.1 nor ASME IX QW-202.2(b) requirements for partial penetration welds. The NRC agrees that an ASME Section IX program, such as the GPUN program, can be used to accomplish AWS D1.1 work as long as the requirements of AWS D1.1 are met. In this case they were not met because your program did not control the effective throat for the partial penetration weld. Additionally, the GPUN welding program does not address skewed tee joint welds which could become a problem area.

These matters were further discussed with you during NRC Inspection 86-19. During these discussions, you pointed out that you felt it was the engineers' responsibility to address these problems. The NRC agrees that engineering should be aware of the options available to them through the welding program when a weld joint is designed. However, the welding program should address the basic minimum requirements of the applicable codes it is designed to address. The NRC will follow up the engineering aspects of this problem in a subsequent inspection. At the conclusion of discussions between the NRC inspectors and your welding personnel, it was our understanding that you intend to revise Section 4.10 of the GPUN Welding Standard as follows:

-- Paragraph 4.10.1.2 will be revised to address AWS D1.1 minimum effective throat requirements for partial penetration welds, and

-- A new paragraph, 4.10.1.5, will be added to address skewed tee joint welds to include control of effective throat of skewed tee joint fillet welds as presented in Appendix B of AWS D1.1.

Violation D.(2): This portion of the violation identified failure of QC to identify inadequate partial penetration welds. Your response stated you did not concur with this finding because neither the weld package nor the engineering documentation specified criteria to which an inspection could be performed. As stated in the details of Inspection Report 85-35, the Structural Weld Record Sheets for the welds in question indicated they had been inspected and accepted by QC. By virtue of the fact that you now state

there were no inspection criteria, one would question the significance of the QC signatures on the weld package.

It is important that QC inspection personnel be trained, experienced, and knowledgeable in the disciplines they inspect. It is apparent in this example that this was not the case. An inspector familiar with AWS D1.1 welding and associated inspection criteria would have identified the inadequate weld penetration as a deficiency and not accepted the weld. The function of a QC organization is, in part, to identify unacceptable conditions. To be effective in this area, a QC program should not be designed such that effective inspection can only be accomplished when specific inspection criteria are given.