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 50-362 San Onofre Nuclear Station, Unit 3, Southern Californ 05000362
 AUTH. NAME AUTHUR AFFILIATION
 PAPAY, L.T. Southern California Edison Co.
 RECIP. NAME RECIPIENT AFFILIATION
 ENGELKEN, R.H. Region 5, San Francisco, Office of the Director

SUBJECT: Forwards interim deficiency rept re noncompliance by
 suppliers of ASME bolting matl. Final rept will be submitted
 by 810316.

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 TITLE: Construction Deficiency Report (10CFR50.55E)

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L. T. PAPAY
VICE PRESIDENT

TELEPHONE
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January 28, 1981

Mr. R. H. Engelken, Director
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Region V
Suite 202, Walnut Creek Plaza
1990 North California Boulevard
Walnut Creek, California 94506

Dear Mr. Engelken:

Subject: Docket Nos. 50-361 and 50-362
San Onofre Nuclear Generating Station, Units 2 and 3

In a letter to your office dated December 29, 1980, we identified a condition which we consider to be potentially reportable in accordance with 10CFR50.55(e). The condition involves a question regarding compliance with the ASME Boiler and Pressure Vessel Code, Section III, NCA-3867.4(e).

Enclosed in accordance with 10CFR50.55(e) are twenty-five (25) copies of an Interim Report entitled, "Interim Report on ASME Code Noncompliance on Bolting Material, San Onofre Nuclear Generating Station, Units 2 and 3."

We are conducting an investigation of this condition and will submit, on or before March 16, 1981, a final report on the full extent of the condition and the corrective action taken.

If you have any questions regarding this report, we would be pleased to discuss them with you at your convenience.

Very truly yours,

[Handwritten signature]

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Enclosures

cc: Victor Stello (NRC, Director I&E)
R. J. Pate (NRC, San Onofre Units 2 and 3)

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INTERIM REPORT ON ASME BOLTING MATERIAL

San Onofre Nuclear Generating Station, Units 2 and 3

INTRODUCTION

This interim report is submitted pursuant to 10CFR50.55(e)(3). It describes a condition discovered during audits conducted by Bechtel Product Supplier Quality (PSQ) personnel of ASME bolting material suppliers. This interim report includes a description of the condition, a summary of the actions underway to complete an analysis of safety implications, and a summary of corrective actions to date. By letter dated December 29, 1980 Edison confirmed notification to the NRC of this potentially reportable condition.

BACKGROUND

On December 10, 1980, the San Onofre Units 2 and 3 Project received notification from the Manager, PSQ, that the material manufacturers and material suppliers of ASME Section III Bolting Material, as listed in the current Bechtel Evaluated Suppliers List, are suspended until further notice from furnishing NCA 3800 bolting material which is not size excluded by Code (in excess of 1" diameter). Conversation with PSQ determined that of the audits of six (6) suppliers conducted as of December 9, 1980, five (5) of the suppliers were found to be in noncompliance with the Code. Specifically, these suppliers were verifying chemical composition of purchased stock material by performing tests of samples from each heat or lot rather than performing a verification of each piece of bar stock furnished by the material manufacturer as required by paragraph NCA-3867.4e of Section III of the ASME Code.

DISCUSSION

The following discussion is responsive to 10CFR50.55(e)(3).

Description of Deficiency

Certain material manufacturers and material suppliers of ASME Section III Bolting Material have been found in noncompliance with paragraph NCA-3867.4a of Section III of the ASME Code. These suppliers are verifying chemical composition of purchased stock material by performing tests of samples from each heat or lot rather than performing a verification of each piece furnished by the stock material manufacturer.

Analysis of Safety Implications

The analysis of the safety implications of this ASME Code non-compliance is not complete. As discussed in CORRECTIVE ACTION, below, we are in the process of obtaining and correlating all necessary data to complete the analysis.

CORRECTIVE ACTION

Corrective actions which have been taken or are in progress are summarized as follows:

- a. A hold was placed on all the subject ASME bolting material in stock.
- b. A review of the ASME bolt material field installation documentation has been completed by Field Engineering and Quality Assurance. The supplier(s) will be requested to provide evidence that bolting material manufactured from these heat lots conforms to paragraph NCA 3867.4(e).
- c. Letters have been issued to all suppliers of equipment which contains ASME bolting material. The letter informs the supplier of the situation; requests that they determine if bolting material in excess of 1" was included in their equipment and if so, to identify the supplier. The suppliers will be requested to provide evidence that this bolting material conforms to paragraph NCA 3867.4(e).
- d. A Code case requesting more specific determination of the requirements in paragraph NCA 3867.4(e) has been submitted to ASME.

A final report will be submitted by March 16, 1981.

QUESTIONS AND ANSWERS - REFERENCE

W.E. CAMPBELL MEMO

1. QUESTION - COULD YOU PROVIDE A COPY OF 12/29/80 LETTER?

ANSWER - A COPY OF THIS LETTER IS ENCLOSED.

2. QUESTION - CAN YOU TELL ME WHICH YEAR ASME SECTION III AND ADDENDA THE TWO SAN DIEGO 2/3 UNITS ARE COMMITTED TO?

ANSWER - YEAR - 1974
ADDENDA - SUMMER 1974

3. QUESTION - DOES THE PROCUREMENT TO THE "MATERIAL SUPPLIED" DOCUMENTS FOR THE SUBJECT BOLTING MATERIAL REFER TO (A) 10CFR PART 21 OR (B) ASME SECTION III?

ANSWER - IN PURCHASE ORDER PD V4155D31 TO TEXAS BOLT CO., HOUSTON, TEXAS, THE ASME SECTION III ~~1974~~ 1974 CODE AND SUMMER 1974 ADDENDA WERE IMPOSED. ALSO IN CHANGE ORDER NO. 22 TO THIS PURCHASE ORDER 10CFR PART 21 WAS IMPOSED.

4. QUESTION - CAN YOU PROVIDE ME ANY ADDITIONAL INFORMATION IN REGARD TO THE "CODE CASE" THAT IS MENTIONED IN PARAGRAPH d OF THE ENCLOSURE?

ANSWER - CODE CASE N242

NOTE: THE MARCH 13, 1981 LETTER FROM SCE IS SUBMITTED FOR YOUR INFORMATION.