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FLORIDA POWER & LIGHT COMPANY

July 16, 1979
L-79-192

Mr. C. E. Murphy, Chief
Reactor Construction and Engineering Support Branch
U. S. Nuclear Regulatory Commission
101 Marietta Street, N. W., Suite 3100
Atlanta, Georgia 30303

Dear Mr. Murphy:

Re: RII:NE
50-389/79-07

Florida Power and Light Company has reviewed the subject inspection report and our response is attached. There is no proprietary information contained in the report.

Very truly yours,

Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU:MV:cf

Attachment

cc: James P. O'Reilly, Office of Inspection and Enforcement
Harold F. Reis, Esquire

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ATTACHMENT

R11:NE
50-389/79-07

A. DEFICIENCY: Incomplete Procedure Qualification Records

Contrary to Paragraph QW201.2 of ASME Section IX, on May 16, 1979 certain required specific facts (essential/nonessential variables) were found recorded in PQR's in terms of ranges or had been omitted. These variables included amps and volts, gas cup size, purge, shield gas flow, preheat, joint design and where a combination of weld processes were involved, the weld metal thickness deposited by each process was not specified.

RESPONSE: The following corrective actions have been taken to resolve the above deficiency:

The variables shown on existing PQR's are in fact actuals. The manner in which they are shown causes them to appear to be ranges. A generic letter of information will be issued for all PQR's that have been qualified for PSL-2 Construction. The letter will state that all variables recorded are actuals and not ranges as they appear.

In the future, all new PQR's will record the variables as required in Section IX Paragraph QW 201.2 of the ASME B&PV Code.

The inspector included in the above deficiency the requirement to specify on the PQR the weld metal thickness deposited by each process when a combination of weld processes is used. FPL has reviewed article IV of Section IX and can find no evidence that deposited weld metal thickness is considered an essential variable. Non essential variables are not required to be recorded in the PQR, only in the WPS per paragraph QW-201.2 of Section IX.

B. INFRACTION: Instructions, Procedures and Drawings - Failure to Follow Procedure.

Contrary to Section 5 of the FPL TQAR which specifies that activities affecting quality shall be accomplished in accordance with instructions, procedures or drawings, the inspector identified two instances where either code or procedural requirements were not being followed.

(1) Radiographs of welder performance qualification test coupons were not being appropriately identified and the acceptable/rejectable type indications found in the welds were not being recorded on the form in accordance with Radiographic Procedure QI 9.3, Revision 1.

RII:NE
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RESPONSE: The following corrective actions have been taken to resolve the above noncompliance:

It should be noted that even though our system for identifying nonpermanent radiographs was not defined by CPLQI 9.3 Rev. 1, a system was established and demonstrated to be working at the time of the inspection. This situation has been corrected in accordance with CPL:QI 6.1 by the issuance of Temporary Change No. SL-66 which simply incorporates the established practice into our procedure. The change required that film which is not to be retained be identified with a shooting sequence number and the date with a work sheet for positive temporary identification.

The audit report stated that "Acceptable/rejectable type indications found in the welds were not being recorded on the form." It should be noted that our personnel have always recorded rejectable indications on their reports. To address this concern, we have issued Memo No. SLQ-79-349 to all radiographic personnel informing them that they are to identify all relevant indications on their reader sheets prior to evaluating them. As there is no ASME B&PV Code requirement that acceptable indications be identified and the form itself was designed only to list rejectable indications, our personnel did not list acceptable indications they found. We believe our people followed CPL:QI 9.3 Rev. 1 requirements as they existed at the time of the inspection.

(2) Paragraph QW-303.6 of ASME Section IX specifies that "Welders who make fillet-welds on a pipe or tube less than 2-7/8 inches outside diameter must pass the pipe fillet weld test per QW-452.4," (e.g., macro and fracture tests). On May 17, welder performance qualification record (PQR) for a fillet-weld test on WPS-43F, performed using a 1/2 inch pipe, showed results for the fracture test only while the macro test portion had been omitted and marked "N/A".

RESPONSE: The following corrective actions have been taken to resolve the above noncompliances:

On September 19, 1978 Mr. J. E. Lamb, Clock #13/534, Weld Symbol PQK (which is the welder in question) made a performance welding qualification using WPS-43A.

This performance was with small diameter pipe (1/2"Ø x .109" th) and satisfactorily passed in accordance with ASME Section IX QW-462.3A requirements. QW-303.6 states Welders who pass the required test for groove welds shall also be qualified for fillet welds. Therefore, the Performance Qualification Test in question was not required to be made. A new welder qualification record has been completed which shows that the welder is qualified to WPS-43F through his having qualified to WPS-43A. The old performance qualification record for WPS-43F will be marked void with a note showing that the welder is qualified through his WPS-43A qualification. In the future, when a fillet weld is qualified through a groove weld test, we will state this on the WPS form (e.g. WPS-43A qualifies WPS-43F).



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA ST., N.W., SUITE 3100
ATLANTA, GEORGIA 30303

In Reply Refer To:
RII:NE
50-389/79-07

JUN 21 1979

Florida Power and Light Company
Attn: R. E. Uhrig, Vice President
Advanced Systems and Technology
Post Office Box 529100
Miami, Florida 33152

Gentlemen:

This refers to the inspection conducted by N. Economos of this office on May 15-18, 1979 of activities authorized by NRC Construction Permit No. CPPR-144 for the St. Lucie facility, Unit 2, and to the discussion of our findings held with J. D. Kirk at the conclusion of the inspection.

Areas examined during the inspection and our findings are discussed in the enclosed inspection report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector.

We have examined actions you have taken with regard to previously reported unresolved items. The status of these items is discussed in the enclosed report.

Two new unresolved items resulted from this inspection and are discussed in the enclosed report. These items will be examined during subsequent inspections.

During the inspection, it was found that certain activities under your license appear to be in noncompliance with NRC requirements. These items and references to pertinent requirements are listed in the Notice of Violation enclosed herewith as Appendix A. This notice is sent to you pursuant to the provisions of Section 2.201 of the NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations. Section 2.201 requires you to submit to this office, within 20 days of your receipt of this notice, a written statement or explanation in reply including: (1) corrective steps which have been taken by you, and the results achieved; (2) corrective steps which will be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosed inspection report will be placed in the NRC's Public Document

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Room. If this report contains any information that you (or your contractor) believe to be proprietary, it is necessary that you make a written application within 20 days to this office to withhold such information from public disclosure. Any such application must include a full statement of the reasons on the basis of which it is claimed that the information is proprietary, and should be prepared so that proprietary information identified in the application is contained in a separate part of the document. If we do not hear from you in this regard within the specified period, the report will be placed in the Public Document Room.

Should you have any questions concerning this letter, we will be glad to discuss them with you.

Sincerely,



C. E. Murphy, Chief
Reactor Construction and
Engineering Support Branch

Enclosures:

1. Appendix A, Notice of Violation
2. Inspection Report No. 50-389/79-07

cc w/enclosures:

C. M. Wethy, Plant Manager
Post Office Box 128
Ft. Pierce, Florida 33450

Nat Weems, Assistant QA Manager
Post Office Box 128
Ft. Pierce, Florida 33450