

**Washington Public Power Supply System**

P.O. Box 968 3000 George Washington Way Richland, Washington 99352 (509) 372-5000  
Docket No. 50-397

RECEIVED  
NRC

REGION VICE

January 20, 1982  
602-82-87

Mr. B. H. Faulkenberry  
Chief, Reactor Construction  
U.S. Nuclear Regulatory Commission  
Region V  
1450 Maria Lane, Suite 210  
Walnut Creek, California 94596

Subject: NUCLEAR PROJECT NO. 2  
NRC INSPECTION OF OCTOBER 1981  
CONSTRUCTION PERMIT NO. CPPR-93

Reference: Letter from B. H. Faulkenberry to R. G. Matlock, dated  
December 21, 1981, NRC Inspection at WNP-2 Site - 1981  
Report No. 50-397/81-21

The reference letter delineated the results of the October, 1981 inspection of activities authorized by NRC Construction Permit No. CPPR-93. Further, the reference identified certain activities which were not conducted in full compliance with PSAR requirements set forth in the Notice of Violation enclosed as Appendix A. This item of non-compliance has been categorized into a level as described in Supplement II of the Federal Register dated October 7, 1980 (45FR66754) as the Interim Enforcement Policy.

The specific finding, as identified, and the Supply System's response is provided herewith as Appendix A.

  
R. G. Matlock  
WNP-2 Program Director

RTJ/kd

Attachment: Appendix A

cc: W. S. Chin, BPA - Site  
R. A. Feil, NRC Residnet Inspector, WNP-2  
A. Forrest, Burns and Roe - HAP0  
N. D. Lewis, NRC  
J. Plunkett, NUS Corp.  
R. E. Snaith, Burns and Roe - NY  
V. Stello, NRC  
EDC WNP-2 Files

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STATE OF WASHINGTON)  
COUNTY OF BENTON )

R. G. Matlock, Being first duly sworn, deposes and says: That he is the Program Director, WNP-2, for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that he is authorized to submit the foregoing on behalf of said applicant; that he has read the foregoing and knows the contents thereof; and believes the same to be true to the best of his knowledge.

DATED JAN 20, 1982

*R. G. Matlock*  
R. G. Matlock

On this day personally appeared before me R. G. Matlock to me known to be the individual who executed the foregoing instrument and acknowledged that he signed the same as his free act and deed for the uses and purposes therein mentioned.

GIVEN under my hand and seal this 20<sup>th</sup> day of January 1982

*Oran Waver*  
Notary Public in and for the State  
of Washington  
Residing at *Kennewick*



## APPENDIX A

As a result of the inspection conducted during October 1981, and in accordance with the Interim Enforcement Policy, 45, FR 66754 (October 7, 1980), the following violation was identified:

10CFR50, Appendix B, Criterion V, states, in part, that: "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these..."

Section D.2.5.5 of the PSAR for the Washington Nuclear Project Unit No. 2 describes that measures would be established to comply with the above requirement.

Burns and Roe Engineering instruction to Bechtel, in specification change document PED-215-W-A804 required that piping walkdown inspection for arc strikes shall include participation by an AWS certified QC Inspector and a Field Welding Engineer. It also required that upon inspection and evaluation by these individuals, any unacceptable defects shall be removed by grinding and the ground area be subject to liquid penetrant examination in accordance with applicable Codes and Standards. The applicable ASME Code Section III, Part 2500 includes varying requirements for liquid penetrant testing, depending upon the class (1, 2, or 3) and the product form (plate, casting, welded pipe, seamless pipe).

Contrary to the above requirements, on October 29, 1981 the following circumstances persisted:

### FINDING A

Bechtel Quality Control Inspection Records (series P-1.10 walkdown inspections) for the period of August 1981 to October 1981 included no requirements for liquid penetrant testing, and showed that liquid penetrant testing had not been performed for arc strike inspection, evaluation, and removal for System 58.0 (Service Water System). Neither the Quality Control Inspector nor the Supervisor could identify the ASME requirements for liquid penetrant testing when they were first interviewed by the inspector.

This is a Severity 5 violation (Supplement II)..

### SUPPLY SYSTEM RESPONSE

- A. Corrective Steps Taken And Results Achieved - A Bechtel Quality Control field form (QCF-4000) was generated for use as an attachment to the referenced Quality Control Inspection Records (series P-1.10). This supplementary record provided the necessary guidance for determining when liquid penetrant testing was required, based on ASME class and type of material (i.e. forgings, tube and fittings welded with filler metal, cast products, and tube and fittings without filler metal). Arc strike inspections previously performed were evaluated to this supplemental instruction and it was determined that previous inspections had, in fact, been properly performed.

THE  
FEDERAL  
BUREAU OF  
INVESTIGATION  
OF THE  
DEPARTMENT OF JUSTICE  
WASHINGTON, D. C.

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SUPPLY SYSTEM RESPONSE (Continued)

- B. Corrective Steps Which Will Be Taken To Avoid Further Items Of Noncompliance - Burns and Roe Engineering instruction to Bechtel (Project Engineering Directive - 215-W-A804) was superseded on November 30, 1981 by PED-215-W-B199. This engineering direction more clearly defines the Nondestructive Examination requirements to be employed in the Welding Arc-Strike Removal Program. This directive also now requires that "examination shall be performed by ... personnel ... that have been trained specifically in arc strike evaluation by the Engineer." This training program is currently in progress and will provide instruction to Bechtel and other site contractor inspection personnel.
- C. Date Of Full Compliance - Form QCF-4000, Supplementary Arc Strike Removal Record, was included as an attachment to the Quality Control Inspection Record for use with PED-215-W-A804 and applicable training to inspection personnel was completed November 11, 1981.

Subsequently, the engineering direction which formed the basis for the noncompliance, was superseded by PED-215-W-B199 on November 30, 1981.

FINDING B

A qualified Field Welding Engineer did not accompany the Bechtel QC Inspector during arc strike evaluations. Quality records for the period August 1981 to October 1981 included no decision to grind and accept arc strikes. Examples where arc strikes had existed can be found on piping shown by isometric drawing numbers SW(7)312-1, SW(17)300-1.3, SW(27)308-1.2, SW(29)298-1.3 and 4, 6, SW(80)091-6.13-1, and SW(100)013-1.8.

This is a Severity Level V violation (Supplement II).

SUPPLY SYSTEM RESPONSE

- A. Corrective Steps Taken And Results Achieved - Although a Field Welding Engineer did not accompany the Bechtel QC Inspector during initial arc strike evaluation, all unacceptable defects noted by the QC Inspector were documented on Bechtel Nonconformance Reports and dispositions were provided by Field Welding Engineering after their evaluation of the defect. In addition, a Field Welding Engineer was assigned to accompany the Bechtel QC Inspector during arc strike evaluations performed after the above deficiency was noted, as required by PED 215-W-A804.

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SUPPLY SYSTEM RESPONSE (Continued)

A. (Continued)

The referenced Quality Control Inspection Records include as an attachment a "mark-up" of the applicable piping isometric drawing. All arc strikes detected are noted on this drawing along with the inspectors comments regarding acceptability or required rework. The Quality Control Inspector performing the inspection was qualified in accordance with the engineering direction in effect at the time the deficiency was noted (i.e. AWS QCI Certified Welding Inspector).

B. Corrective Steps Which Will Be Taken To Avoid Further Items Of Noncompliance - The noted requirement contained in Project Engineering Directive 215-W-A804 was deleted by PED-215-W-B199 which was issued November 30, 1981.

C. Date Of Full Compliance - Full compliance was achieved on October 29, 1981, when the deficiency was noted.

