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 RECIP. NAME: SCHWENCER, A. RECIPIENT AFFILIATION: Licensing Branch 2

SUBJECT: Clarifies use of quality verification instruction (QVI-09) by facility project visual exam acceptance criteria for reverification insp of welded structures. Revised Page 3.8-190, to be incorporated into amend to FSAR.

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Washington Public Power Supply System

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September 16, 1983
G02-83-840

Docket No. 50-397

Director of Nuclear Reactor Regulation
Attention: Mr. A. Schwencer, Chief
Licensing Branch No. 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Schwencer:

Subject: NUCLEAR PROJECT NO. 2
CLARIFICATIONS ON THE USE
OF PROJECT INSTRUCTION QVI-09

Reference: Letter, G02-83-249, G. D. Bouchee (SS) to A.
Schwencer (NRC), WNP-2 Project Visual Examination
Acceptance Criteria for Reverification Inspection
of Welded Structures (QVI-09, Revision 1), dated
March 23, 1983

On September 13, 1983, the Supply System and NRC met to discuss several licensing issues, including the use of Quality Verification Instruction QVI-09 by the WNP-2 Project. The purpose of this letter is to document clarifications relative to the use of that instruction. QVI-09 was formally transmitted to the NRC by the reference and is currently discussed in the WNP-2 FSAR in Section 3.8, p. 3.8-190.

The clarifications are:

- QVI-09 applies only to AISC scope.
- QVI-09 is unique to the WNP-2 Project.
- QVI-09 was only used for a limited, sample reinspection of structural steel welds for work completed, inspected and accepted before July 1980 for construction contracts 206, 215 and 233.

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1. The first part of the report is a general description of the project and its objectives. This section includes a brief history of the project and a statement of the problem being addressed. It also outlines the scope of the project and the methods that will be used to collect and analyze data.

2. The second part of the report is a detailed description of the data collection process. This section includes information about the sources of the data, the methods used to collect the data, and the steps taken to ensure the accuracy and reliability of the data. It also discusses any challenges that were encountered during the data collection process.

3. The third part of the report is a description of the data analysis process. This section includes information about the statistical methods used to analyze the data, the results of the analysis, and the conclusions that were drawn from the data. It also discusses any limitations of the analysis and the implications of the findings.

4. The fourth part of the report is a conclusion and a list of references. The conclusion summarizes the main findings of the project and discusses the implications of the results. The references list the sources of the data and the literature that was consulted during the project.

5. The fifth part of the report is an appendix containing additional information that was used in the project. This section includes a list of the data sources, a copy of the data collection instrument, and a copy of the data analysis software.

A. Schwencer

Page Two

September 16, 1983

CLARIFICATIONS ON THE USE OF PROJECT INSTRUCTION QVI-09

- The scope of hardware for which QVI-09 was applied within contracts 206, 215 and 233 includes: radial and structural framing systems, steam tunnel beams, and pipe supports (AISC scope).
- QVI-09 was not applied to Categories C, D, or E welds.
- The technical justification for the use of QVI-09 is unique for WNP-2.
- The use of QVI-09, or other similar instruction/criteria, by other nuclear projects would need to be evaluated specific to that Project. (Other Supply System projects have not performed such an evaluation to date and would discuss such new criteria with the NRC before implementation.)
- The acceptance of the minor weld deficiencies allowed by QVI-09 precludes the potential for adding unnecessary, potentially damaging stresses that could result from weld repair/buildup.
- The repair of minor weld deficiencies allowed by QVI-09 would not necessarily enhance the safety function of affected components, systems or structures.

In addition, FSAR page 3.8-190 is being revised as shown on the attachment. This revision will be incorporated in an amendment to the FSAR.

Should you have questions on the above, please contact Mr. P. L. Powell, Manager, WNP-2 Licensing. We appreciate your assistance in resolving this issue.

Very truly yours,

Alan Sorensen

G. C. Sorensen, Acting Manager
Nuclear Safety and Regulatory Programs

DCT/tmh

Attachment: FSAR page 3.8-190

cc: R Auluck - NRC
WS Chin - BPA
A Toth - NRC Site

DRAFT

WNP-2

AMENDMENT NO. 30
June 1983

TABLE 3.8-9 (Continued) Page 3 of 8

<u>REFERENCE NUMBER</u>	<u>DESIGNATION</u>	<u>TITLE</u>	<u>EDITION</u>
18	AISC-69	Specification for the Design, Fabrica- tion, and Erection of Structural Steel for Buildings	Feb. 12, 1969
19	AISC-68	Specification for the Design of Light Gauge Cold-Formed Steel Structural Members	1968
20	AWS D1.1-72	Structural Welding Code	1972**
21	AWS D12.1-61	Recommended Practice for Welding Reinforc- ing Steel, Metal In- serts, and Connection in Reinforced Concrete Construction	1961

** As part of the WNP-2 Quality Verification Program, visual reinspection of selected structural steel welds, including radial and structural framing systems, steam tunnel beams, and pipe hangers (AISC scope only) was performed under Supply System procedure QVI-09, Attachment 2.*** This procedure included alternative acceptance criteria to AWS D1.1.

These alternative acceptance criteria were established by the Architect/Engineer and determined to be acceptable based on specific knowledge of the design and the significance of these types of minor deficiencies. The criteria were implemented in order to provide a conservative and practical basis for performing a reinspection of the structural steel. Sacrificial shield wall and pipe whip restraint weld reinspections were performed to AWS D1.1. y

*** Transmitted to NRC via letter G02-83-249, G. D. Bouchey to A. Schwencer, "WNP-2 Project Visual Examination Acceptance Criteria for Reverification Inspection of Welded Structures", dated March 23, 1983.

{ QVI-09 was not applied to Category C, D or E welds.
3.8-190