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REGION V IRE

U. S. Nuclear Regulatory Commission
Region V
1450 Maria Lane - Suite 210
Walnut Creek, CA 94596-5368

IE HQ FILE COPY

Attention: Mr. D. F. Kirsch, Acting Director
Division of Reactor Safety and Projects

Subject: Response to Notice of Violation 50-528/84-15/01
(Post-weld Welder Qualification)
File: 84-019-026; D.4.33.2

References: (1) Exit Meeting conducted December 7, 1984, for NRC Inspection
of December 3 - 7, 1984.
(2) Meeting between W. E. Ide and J. Martin on October 24, 1984,
in Phoenix, AZ.
(3) Letter from E. E. Van Brunt, Jr. to T. W. Bishop, ANPP-29924,
dated July 10, 1984.
(4) Meeting among representatives of NRC, ANPP, and Bechtel on
June 11, 1984, in Walnut Creek, CA.

Dear Sir:

The investigation of the post-weld welder qualification work is complete. It was conducted in two phases: (1) a review of Unit 1 ASME Weld records to ensure certified welders were used for the applications, and (2) a review of certification records for all welders including those qualified to AWS.

The results of the investigation are reported on Attachment "A".

Very truly yours,

E. E. Van Brunt, Jr.
APS Vice President
Nuclear Production
ANPP Project Director

EEVB/PJC/plk

Attachment: A & B

cc: See Page Two

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ATTACHMENT A

NOTICE OF VIOLATION 50-528/84-15/01
RESULTS OF POST-WELD WELDER QUALIFICATION INVESTIGATION
ARIZONA NUCLEAR POWER PROJECT
PVNGS UNIT 1

I. Review of Unit 1 ASME Weld Records

Approximately 32,190 Unit 1 ASME weld records were reviewed. This final review is summarized in Attachment "B" which is an update of the welder qualification deviations table.

- A. ANPP was asked to specifically address the welder P-number discrepancies (Item 5, Attachment "B") documented on NCR WX-1084. The following is a summary of the three nonconforming conditions reported.

1. Item 33 of NCR WX-1084 documents that welder P-947 made two 1/4-inch double-sided fillet welds for pipe support 1CH143H002 on or about April 8, 1980, using welding procedure P8, P1-T-Ag. These welds attached carbon steel lugs to a stainless steel pipe spool. At the time the welds were made, the welder was only qualified to welding procedure P1-AT-Lh.

The welder was qualified to procedure P8-AT-Ag on May 13, 1980, which allows use of procedure P8, P1-T-Ag. The discrepancy in completing the two fillet welds on hanger 1CH143H002 was not discovered until the welder qualifications review was conducted earlier this year. Since the welder had successfully upgraded his qualifications in May, 1980, the nonconforming condition was accepted as-is.

2. Item 67 of NCR WX-1084 documents that one of the two welders (P-1666) who welded a 10-inch diameter carbon steel dummy pipe to a 24-inch carbon steel pipe spool on or about August 6, 1981, was not qualified to use the G.T.A.W. process which was one of the two processes identified on the WR-5A. The other welder (P-1553) was qualified to use the G.T.A.W. process. Welder P-1666 was qualified to utilize the stick welding process which was also listed on the WR-5A. The Field Engineering investigation of this reported nonconformance concluded that welder P-1666 did not use the G.T.A.W. process. However, since welder P-1666 upgraded his qualifications on October 7, 1982, to include the G.T.A.W. process, the reported nonconformance was dispositioned "use-as-is" based on the welder's qualifications. To more clearly address the actual administrative error that occurred in failing to accurately define which process was actually used by each welder on the WR-5A, Item 67 will be redispotioned to accept this weld as-is based upon the fact that the welder did not utilize the G.T.A.W. process as reported.

3. Item 73 of NCR WX-1084 was incorrectly identified "use-as-is" on our summary of nonconforming conditions because of P-number discrepancies. The subject weld was cut out and the affected pipe support was changed from a welded restraint strap to a U-bolt after the affected N-5 Code Data Report was signed. Since the affected welding documentation is included as part of the N-5 Code Data Package, the subject nonconformance was accepted "use-as-is" based upon the fact that the weld was cut out and replaced as an ASME Section XI modification.

Therefore, only one nonconforming condition related to P-number discrepancies exists (Item 33 of NCR WX-1084) which was accepted-as-is based upon a post-weld qualification of the welder. Item 5 of Attachment "B" has been changed to one and the total reduced from 92 to 90.

- B. In addition, the NRC requested further information regarding the expiration of welder certifications. The following clarification is provided:

1. NCR WA-753 documents that welder P-2176 made two 1/4 inch ASME Section III single-sided fillet welds for pipe 1CH027HAAE on February 16, 1983. This welder's ASME certification expired on January 5, 1983. The welding procedure involved was P1-A-Lh and the welder in question held a valid AWS certification at the time the weld was made. The welder was requalified on May 18, 1983, and NCR WA-753 was dispositioned "use-as-is".
2. NCR WC-733 documents that welder P-1459 made socket welds for thermowells TW112CD, TW115 and TW112CB on April 5 and April 6, 1983, using welding procedure P8, P1-T (F-43). At the time the welder was qualified to use procedure P8, P1T (F-43) (LSTG) for fillet welds on plate but was not qualified for piping socket welds in diameters of pipe or tubing below 2 - 7/8-inch outside diameter. The welder upgraded his qualification on April 8, 1983, after the problem was found and NCR WC-733 was dispositioned "use-as-is" on April 14, 1983.

Based on the above information, it can be concluded that the skill of the welder can be demonstrated and that the welder certification was never expired for longer than five months.

II. Review of Welder Certification Records (Including AWS)

The second portion of the investigation was the review of welder certification records for accuracy and completeness. This review was conducted in accordance with Special Construction Inspection Plan No. 619.0. As a result of the certification review, three nonconformance reports were issued: WX-1209 documents discrepancies identified within the scope of SCIP 619.0; WX-1210 and WX-1214 document additional discrepancies which are outside the scope of the review.



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The review detected no errors in essential welder qualification variables which would jeopardize the original welder qualifications. These essential variables include weld process, material specification, electrical characteristics, filler material, weld material, heat treatment, and position. No physical rework of hardware is required. The disposition of discrepancies involve only the correction of erroneous paperwork.

The completed SCIP and the resulting NCR's are on file and available for review.

ATTACHMENT "B"

SUMMARY

WELDER QUALIFICATION DEVIATIONS

UNIT 1

TYPE OF NONCONFORMANCENUMBER OF WELDS INVOLVED

1. Thickness	51
2. Diameter	32
3. Expired Qualification	1
4. Not Qualified to ASME	5
5. Not Qualified for P-Number	1
6. Not Qualified to Weld Butt	0
7. Not Qualified for Process	0

TOTAL NUMBER OF NONCONFORMANCE ASME WELDS	90
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TOTAL NUMBER OF ASME WELDS (INCLUDING REPAIR AND REWORK)	32,190
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REVISED DECEMBER 11, 1984

