

NRC REGION
ATLANTA, GEORGIA

SEP 17 09:08

September 15, 1980
L-80-303

Mr. James P. O'Reilly, Director, Region II
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Re: RII:RMC
50/250/80-18
50/251/80-18

On September 8, 1980 (L-80-293), Florida Power & Light Company described the corrective action which will be taken in response to the subject inspection. We stated that complete reinspections will be performed of the discrepant items. This letter provides the additional corrective action necessary to resolve the inspection finding.

Florida Power & Light Company plans to compare the supports that were identified during the IE Bulletin 79-14 program with the supports that were inspected during the IE Bulletin 79-02 program. The purpose of this comparison is to confirm that all supports requiring inspection in accordance with IE Bulletin 79-02 have been inspected. This activity will be completed prior to January 1, 1981. A procedure for accomplishing the activity will be written by September 22, 1980. Since the Turkey Point Unit 4 refueling outage will begin on approximately November 10, 1980, the comparison will begin with systems inside Unit 4 containment.

In response to the discrepancies that are concerned with IE Bulletin 79-02 documentation, an engineering examination of the documentation developed during the May-June, 1979 Unit 4 refueling outage will be conducted prior to January 1, 1981. FPL believes the concern is limited to the first inspection, i.e., the May-June inspection, because of; (1) procedural changes (see Attachment A for chronological history of inspection procedure changes and Attachment B for history of QC procedural changes), (2) improved training due to experience gained during the May-June outage and the use of training mock-ups, (3) the assignment of Level II QC inspectors to evaluate the documentation as it left the field (see Attachment B), and (4) the results from a subsequent FPL audit (TPQ-80-033 dated April 8, 1980). A procedure for conducting the engineering examination of the IE Bulletin 79-02 May-June, 1979 documentation will be written by October 15, 1980. If after an examination of 35% of the total May-June documentation, the number of unacceptable deviations is less than 5% at a

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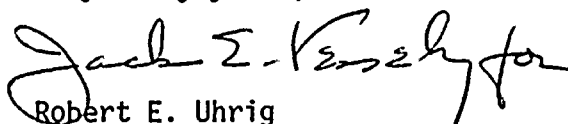
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95% confidence level, the examination program will be terminated.

Unacceptable deviations identified in the IE Bulletin 79-14 and 79-02 comparisons, and the engineering examination of the 79-02 documentation will result in inspections of the specific discrepant items. Inspections and repairs on systems which are inaccessible during normal operation will be conducted during scheduled outages.

Future QC training for the remaining IE Bulletin 79-02 and 79-14 work will emphasize the need to follow procedures.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Robert E. Uhrig", written in a cursive style.

Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/RAK/ah

Attachments

cc: Harold F. Reis, Esquire

ATTACHMENT A

Re: RII:RMC
50-250/80-18
50-251/80-18

The following revisions were made to Bechtel Repair Procedure 5177-098-P-1 during the course of the IE Bulletin 79-02 work:

REVISION 0, 5/5/79

Issued for Use.

REVISION 1, 5/10/79

Revised reference document from CPL: W110.24 to CPL: Q110.24.

Revised to allow alternate hole location in cases where rebar was encountered during core drilling operations.

Revised to reference NCR disposition for hole depth and anchor location, spacing, type, length and diameter.

Revised to reference Bechtel welding procedure number.

Revised to clarify bolt projection. Instead of "The bolt projection shall provide a minimum of 2 threads per nut.", the words "per nut" were revised to read "past the nut".

REVISION 2, 5/18/79

Revised to reference the use of deficiency reports in addition to nonconformance reports.

Revised to require submission of cut rebar records to engineering for evaluation.

Added requirement to maintain records of deficiency reports.

Added torque values for Hilti Kwik-Bolts.

Revised Figure 1 to show required weld dimensions for base plate repair.

REVISION 3, 10/29/79

Added provision to permit relocation of small pipe supports up to 2 feet along the axis of the pipe.

REVISION 4, 10/19/79

Deleted requirement to give Inspection Reports and Deficiency Reports to Bechtel,

Lead Resident Engineer for evaluation.
(Rev. 4 only requires NCR's to be forwarded.)

Added provision to permit relocation of large pipe supports in accordance with Spec. 5177-M-56 (after verification of design location).

Added piping Specs. 5177-M-56 and 5177-M-53 as reference documents.

Deleted requirement to send final copies of Procurement documentation wrench calibration records, as-builts, and deficiency reports to Project Engineer.

Governing document for welding and weld examination was changed to Spec. 5177-M-53 (welding was formerly controlled by Bechtel Welding Procedure P1-A-Lh; weld examination was formerly as per ANSI B31.1).

REVISION 5, 12/18/79

Added option to extend existing base plates "with plate stiffener, if needed".

REVISION 6, 2/28/80

Revised torque values for Hilti-Kwik bolts for lower allowable torques per manufacturer test results.

REVISION 7, 8/28/80

Added torque value for $\frac{1}{4}$ inch diameter Hilti-Kwik bolt to allow field use of this size bolt.

ATTACHMENT B

Re: RII:RMC
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Quality Instruction 10.24, "Inspection and Testing of Concrete Expansion Anchors for Installed Pipe Supports," was revised on October 30, 1979 prior to the next I. E. Bulletin 79-02 Anchor Bolt Inspection/Repair Program. The revisions were of two general types:

- 1) Refinements, based upon field experience during the first unit work, which defined how to accomplish the inspection task.
- 2) The inclusion of a paper review by Senior Level II QC inspectors to identify inconsistent data and the inclusion of acceptance criteria for QC to perform an accept/reject review. These changes are reflected in the new/revised Attachments #2, 3, 4, & 5 to QI 10.24 Rev. 1 dated 10/31/79.

The changes that were made in Rev. 1 of QI 10.24 resulted in the Quality Control Department making a major change in the processing of Inspection Reports for subsequent I. E. Bulletin 79-02 work.

Upon completion of an inspection in the field the Inspection Record was routed to a Level II - 79-02 evaluator, who performed an indepth review of the Inspection Report for completeness, acceptability and legibility. The Level II inspector was responsible for determining the acceptability or rejectability of the Inspection Report, which resulted in one of the following three conditions:

1. As-found condition is acceptable and no further work is required.
2. As-found condition is unacceptable and a discrepancy report is generated.
3. Inspection Report is incomplete or inconsistent and the report sent back to the field for completion of inspection.

This screening process by the Senior Level II inspector identified inconsistent data at a time frame that the questions could be easily resolved resulting in better quality Inspection Reports.

A further review was performed on the completed Isometric Drawing packages, which included all Inspection Reports and Discrepancy Reports, by a Level II - 79-02 Evaluator to further assure the completeness and acceptability of the inspection process prior to transmittal to the QA vault.

