

UNRECORDED
VIRGINIA ELECTRIC AND POWER COMPANY

RICHMOND, VIRGINIA 23261

31 APR 13 AM 11:30

April 7, 1981

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

Serial No. 203
NO/RMT:ms
Docket Nos. 50-280
50-281
License Nos. DPR-32
DPR-37

Dear Mr. O'Reilly:

We have reviewed your letter of March 13, 1981 in reference to the inspection conducted at Surry Power Station between February 9-12, 1981, and reported in IE Inspection Report Nos. 50-280/81-06 and 50-281/81-06. Our response to the specific infraction is attached.

We have determined that no proprietary information is contained in the reports. Accordingly, the Virginia Electric and Power Company has no objection to these inspection reports being made a matter of public disclosure. The information contained in the attached pages is true and accurate to the best of my knowledge and belief.

Very truly yours,

B. R. Sylvia
B. R. Sylvia
Manager - Nuclear
Operations and Maintenance

Attachment

City of Richmond
Commonwealth of Virginia
Acknowledged before me this 7th day of April, 1981

Ann C. McRee
Notary Public

My Commission expires: 2-26, 1985

SEAL

cc: Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 3
Division of Licensing

8105070429

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SURRY POWER STATION RESPONSE TO
NOTICE OF VIOLATION APPENDED TO INSPECTION
REPORT 50-280/81-06 - 50-281/81-06

NRC COMMENT

10 CFR 50, Appendix Criterion IX as implemented by Topical Report VEP-1-3A Section 17.2.9 requires in part that measures shall be established to assure that special processes are controlled and accomplished in accordance with applicable codes, standards, specifications, criteria, and other special requirements aimed at assuring adequate fillet throat for piping fillet welds are depicted in the applicable code (USAS B31.1-1967 edition).

Contrary to the above, of February 11, 1981, adequate measures had not been established to assure proper measurement in that a QC inspector, whose function included verification of piping fillet weld sizes, could not demonstrate the fillet weld size measurement process.

This is a Severity Level V Violation (Supplement II.E.).

VEPCO RESPONSE

1. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION;

The violation is not correct as stated.

2. THE REASONS FOR THE VIOLATION IF ADMITTED;

Although exception has been taken to the alleged violation, the following description of circumstances is provided. It is felt that there was a misunderstanding rather than an inadequate knowledge of inspection criteria. The QC inspector in question stated that he thought the NRC inspector was asking a general question about the use of the fillet gauge rather than a specific question about the acceptance criteria of B31.1. The question that was asked by the NRC inspector was whether or not the fillet gauge had to touch the center of weld. The QC inspector responded by stating it was not necessary in all cases. It should be noted that the piping systems are inspected to B31.1 and the structural welds inspected the AWS D1.1. AWS D1.1 allows 1/16 inch clearance between the center of the weld and fillet gauge. Both QC inspectors stated that they had the impression that they were only demonstrating the use of the fillet gauge and were not actually conducting an inspection to any particular acceptance criteria. The situation is considered to be a misunderstanding between the NRC inspector and the QC inspector. The QC inspector in question was re-examined and was able to adequately demonstrate knowledge of the measurement process.

3. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED;

The QC inspector in question was found to have adequate knowledge during re-examination. All welds previously accepted by this inspector were re-inspected. No discrepancies were found. In addition, 50 welds in Containment #1 and 25 welds outside Containment were randomly selected and re-inspected. These were welds previously accepted by other QC inspectors. No discrepancies were found.

VEPCO RESPONSE (Cont'd)

4. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS;

Mockups of typical fillet welds were made and each QC inspector was required to demonstrate his proficiency. The results were satisfactory. Each QC inspector had received additional instruction to ensure that there is no misunderstanding in the use of the fillet gauge.

5. THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED;

Full compliance has been achieved.