

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

January 15, 1980

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. 1171/121979
PO/RMT:baw
Docket No. 50-338

License No. NPF-4

Dear Mr. O'Reilly:

We have reviewed your letter of December 19, 1979 in reference to the inspection conducted at North Anna Power Station Unit No. 1 on November 13-16, 1979 and reported in IE Inspection Report No. 50-338/79-47. Our responses to the specific infractions are attached.

We have determined that no proprietary information is contained in the report. Accordingly, the Virginia Electric and Power Company has no objection to this inspection report being made a matter of public disclosure.

Very truly yours,

C. M. Stallings
C. M. Stallings

Vice President-Power Supply
and Production Operations

Attachment

cc: Mr. Albert Schwencer

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Response to Notice of Violation
Items Reported in IE Inspection Report 50-338/79-47

A. NRC Comment

As required by Criterion V of Appendix B to 10 CFR 50 and implemented by VEPCO Topical Report VEP-1-A Section 17, paragraph 17.2.5 specifies in part, that activities affecting quality are accomplished in accordance with instructions, procedures, and drawings. General Welding Procedure W-1.0 Rev. 1 invokes ASME Section IX (74.W76) which under paragraph QW-2013, requires that each welding process or procedure be qualified either separately or in combination with other processes or procedures ... for the deposited weld metal thickness range for each of the processes or procedures...paragraph QW-351 of the same code requires that the limit of thickness for which a welder is qualified is dependent upon the thickness of the weld he deposits with each welding process.

Contrary to the above, on November 16, 1979, procedure qualification records of weld process specifications and welder performance qualifications involving combination processes did not indicate the weld metal thickness deposited with each welding process.

This is an infraction.

Response

Qualification records of welders and weld procedures involving a combination of weld processes did not indicate the weld metal thickness deposited by each process, as required by ASME Section XI QW-201.3 and QW-351, because the requirement was interpreted incorrectly and unintentionally overlooked when the procedures were originally written.

Pursuant to Section 2.201 of the NRC's "Rules of Practice" Part 2, Title 10, Code of Federal Regulations, the following information is submitted:

1. Corrective steps taken and results achieved:
Welding procedures involving combination processes are presently in the process of being updated to include the weld metal thickness deposited by each welding process. When this is accomplished, full compliance with the ASME codes will have been achieved.
2. Corrective steps which will be taken to avoid further non-compliance:
We believe that no further corrective action is required.
3. Date when full compliance will be achieved:
All necessary updating of welding procedures will be completed and full compliance will have been achieved by March 15, 1980.

B. NRC Comment

As required by Criterion XVII of Appendix B to 10 CFR 50, and implemented by VEPCO Topical Report VEP-1-A, Section 17 paragraph 17.2.17 specifies in part that quality assurance records relating to activities affecting quality shall be maintained as documentary evidence of work performance. Paragraph(s) I-2-2120, I-2-2130, of ASME Section XI (74.S75) requires that ultrasonic equipment be standardized for screen height and amplitude control linearity.

Contrary to the above, on November 16, 1979, there was no documentary evidence to verify that code required standardizations were being performed on licensee owned ultrasonic instruments used for volumetric examinations.

This is a deficiency.

Response

In the past, UT instruments have been periodically calibrated to manufacturer specifications. During this calibration, standardization of screen height and amplitude control linearity was performed but not documented.

Pursuant to Section 2.201 of the NRC's "Rules of Practice", Part 2 Title 10, Code of Federal Regulations, the following information is submitted:

1. Corrective steps taken and results achieved:
Calibration of ultrasonic equipment for screen height and amplitude control linearity has been incorporated in a new UT procedure and will be documented on a separate form. The calibration/standardization will be performed by the equipment operator at least once every 3 months as required by the ASME codes.
2. Corrective steps which will be taken to avoid further non-compliance:
We believe that no further corrective action is required.
3. Date when full compliance will be achieved:
Full compliance will be achieved by February 15, 1980.