

79-152-000



POWER PIPING COMPANY

829 BEAVER AVENUE
PITTSBURGH, PA. 15233

TELEPHONE
AREA 412
231-0700

September 19, 1979

District Director
U. S. Nuclear Regulatory Commission
Region IV
King of Prussia, Pa. 19406

Attention: Mr. R. McGoy

Gentlemen:

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By telephone, on September 14, 1979, you were advised by H. Ray Good, Director, Corporate Quality Assurance for Power Piping Company, that we may have a condition or circumstance involving a deviation from the technical requirements included in a procurement document for pipe spool fabrications for Beaver Valley Power Station, Unit 2 (Docket No. 50-412) of Duquesne Light Company.

In accordance with the notification requirements of 10CFR21, the undersigned is submitting the following report:

1.0 Name of individual informing Nuclear Regulatory Commission

W. R. Patterson
Executive Vice President
Power Piping Company
829 Beaver Avenue
Pittsburgh, Pa. 15233

2.0 Facility and Component

The failure to comply relates to pipe spool fabrications being supplied for Beaver Valley Power Station Unit No. 2 (Docket No. 50-412) of Duquesne Light Company.

3.0 Firm Supplying Component

Power Piping Company
829 Beaver Avenue
Pittsburgh, Pa. 15233

4.0 Description of failure to comply

Pipe spools supplied by Power Piping Company for use in Beaver Valley Power Station Unit No. 2 were fabricated by personnel whose welding qualifications did not comply with ASME Boiler and Pressure Vessel Code, Sections III and IX as required by the procurement specification governing this work. This situation developed as a result of misinterpretation of the ASME Code for welder performance qualification. Specifically,

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the problem is related to qualifications to attach bosses 2 inch and smaller nominal pipe size to larger diameter pipe, butt welding of small diameter pipe, welding machine operator qualification and multi-process welder qualification. As a direct result of these failures to comply, welders performed production welding operations before their qualification to perform those operations were achieved and/or documented.

The nonconformance was discovered by members of Duquesne Light Company Vendor Surveillance Group (DLC-VSG) while performing shop inspections as required by the procurement specifications. Nonconformance and Disposition (N&D) reports were generated and forwarded to Stone & Webster Engineering Corporation (SWEC), agents for Duquesne Light Company performing the engineering and construction management for BVPS-2.

Upon receipt of the SWEC dispositions and evaluation of the consequences thereof, Power Piping Company determined that there may be a failure to comply under the rule of 10CFR21.

The pipe fabrications constitute subassemblies of piping systems required for safe shutdown of or accident mitigation for BVPS-2. Failure of weld joints in these systems could impair the ability of these systems to perform their safety functions.

5.0 Date of Failure to Comply Identification

The nonconformances were identified as 10CFR21 defect on September 13, 1979. This matter was reported to NRC Inspection and Enforcement Division, Region I on September 14, 1979.

6.0 Location of Components

The safety related piping fabrications affected by this failure to comply are restricted to the Beaver Valley Power Station-Unit No. 2. A total of 167 fabricated spools are affected; 46 are on hold at Power Piping Company's Donora facility, the remaining 121 are on hold at the BVPS-2 site.

7.0 Corrective Action/Responsibility

7.1 Corrective action is being performed as follows:

1. All work by welders not properly qualified to the ASME Code was ceased upon issuance of the N&D report by the DLC-VSG inspectors.
2. With assistance of DLC-VSG, all fabrications containing the failure to comply have been identified through a comprehensive review of documentation.

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7.0 continued

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3. All affected fabrications were located at the Power Piping Company facilities or at the RVPS-2 site. All spools were placed in a quality control reject status.
 4. The following disposition will be applied to the welds with deficient welder qualifications:
 - A. The welders/welding operators will be qualified by radiographically examining production welds in accordance with ASME IX requirements or
 - B. The welds will be qualified by radiographically examining the welds to the acceptance criteria of ASME III or
 - C. The welds will be ground out and rewelded by qualified welders or welding operators.
 5. All welds found unacceptable through item 4 above in conjunction with the requirements of ASME Code, Section III, Article NB-5000 are being reworked.
- 7.2 The organization responsible for corrective action is Power Piping Company, at the address given in 3.0 above.
- 7.3 Power Piping Company estimates that 120 days will be required to complete all corrective action.

8.0 Advise to Purchasers

The Purchaser's inspection agency (DLC-VSG) identified the nonconformance and the Purchaser's engineers (SWEC) provided the disposition. Power Piping Company is currently working with both Duquesne Light Company Vendor Surveillance Group and Stone & Webster Engineering Corporation in resolution and corrective action. Corrective action cited under 7.1 above is being performed both at the Power Piping Company Donora facility and Beaver Valley Power Station Unit No. 2 site depending upon location of the affected fabrications.

Your cooperation and assistance will be appreciated.

Very truly yours,

W. R. Patterson

W. R. Patterson
Executive Vice President

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ATTACHED IS A PART 21 REPORT FROM IE MAIL UNIT - ROOM 359E/W

T/C

PART 21 IDENTIFICATION NO. 79-152-000 COMPANY NAME Power Piping Co.

DATE OF LETTER 9/19/79 DOCKET NO. 50-412

DATE DISTRIBUTED _____ ORIGINAL REPORT ☒ SUPPLEMENTARY ☐

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BOB DENWIG, MPA

ACTION:

PRELIMINARY EVALUATION OF THE ATTACHED REPORT INDICATES LEAD RESPONSIBILITY FOR FOLLOW-UP AS SHOWN BELOW:

IE ☒

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