

Washington Public Power Supply System
A JOINT OPERATING AGENCY

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May 26, 1981
G03-81-2046

Nuclear Regulatory Commission, Region V
Suite 202, Walnut Creek Plaza
1990 North California Boulevard
Walnut Creek, California 94596

Attention: Mr. B. H. Faulkenberry
Chief, Reactor Construction Projects Branch

Gentlemen:

Subject: PROJECT NOS. 3 AND 5
NRC INSPECTION OF WNP-3 AND WNP-5
DOCKET NUMBERS 50-508 AND 50-509

- References: 1) Letter, B. H. Faulkenberry to R. S. Leddick,
same subject, dated April 29, 1981.
- 2) Federal Register Notice (45 FR 66754, dated
October 7, 1980).

This letter is in response to your letter of April 29, 1981 which discussed the results of the inspection conducted March 2 to 27, 1981 of activities authorized by the Nuclear Regulatory Commission Construction Permit Numbers CPPR-154 and CPPR-155. The letter identified one item of non-compliance categorized in accordance with Reference 2 and required the Supply System to provide a response to the item.

The specific Nuclear Regulatory Commission finding, as stated in your letter, and the Supply System response are provided in Attachment 1 to this letter.

Should you have any questions or desire further information, please feel free to contact me directly.

Very truly yours,

R. S. Leddick
Program Director, WNP-3/5

Attachments

cc: D. Smithpeter - BPA
Ebasco - New York
WNP-3/5 Files - Richland



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Nuclear Regulatory Commission-Finding

10CFR 50, Appendix B, Criterion IX states in part: "Measures shall be established to assure that special processes, including welding, . . . are controlled and accomplished . . . using qualified procedures in accordance with applicable codes, standards, specifications, criteria, and other special requirements."

Paragraph 17.4.9 of the Quality Assurance Program documented in the PSAR states in part: ". . . Special procedures prepared by site contractors will be qualified when required in accordance with applicable codes and standards . . ."

The electrical installation contract specification (No. 3240-225/253) specifies that electrical cable tray support welding shall be accomplished in accordance with the AWS Structural Welding Code D1.1. The Structural Welding Code states that procedures must be qualified unless certain requirements are met. Among these requirements is that fillet welds must meet minimum size requirements for various base metal thicknesses. For example, for base metals thicker than 3/4 inch the minimum fillet weld size is 5/16 inch. The electrical cable tray support drawings (e.g., Dwg. No. SS-27 for supports E-162 through E-165) designate 3/16 inch fillet welds for base material thicknesses of 1.26 inches. In addition, approved Field Change Request No. FCR-F-1017 of January 14, 1981, for Contract No. 3240-225/253 specifies that the contractor's fillet weld procedure must be qualified.

Contrary to the above, as of March 26, 1981, the contractor had not qualified his fillet welding procedure, yet had used this procedure for the welding of all safety-related cable tray supports.

This is a Severity Level V Violation (Supplement II), applicable to Unit 3 only.

Nuclear Regulatory Commission-Finding

Corrective Steps Which Have Been Taken:

1. When notified of the item of noncompliance, Fischbach & Moore (F&M) Inc., 3240-225/253 contractor, had previously stopped welding Class I seismic supports as a result of F&M Stop Work Order (SWO) 002. F&M SWO 002 was issued March 13, 1981, for reasons other than welding. Subsequently, the Stop Work corrective action allowed for release of material for fabrication and installation. All welding on supports released for fabrication was performed to qualified welding procedures.
2. To preclude use of unqualified multiple pass fillet welds during installation, F&M IOM, A. N. McLeod to J. A. Wiley, dated April 22, 1981, prohibited the use of all multiple pass welds until a procedure was qualified.
3. F&M IOM, A. N. McLeod to J. A. Wiley, dated April 27, 1981, rescinded the IOM in Item 2 and clarified use of multiple pass welds to those covered by Table 2.7 of AWS D1.1.
4. Upon completion of F&M's investigation of multiple pass welds performed prior to notification of the noncompliance, F&M issued NCR 225-3036 on April 28, 1981. This NCR is presently being evaluated by Ebasco.

Corrective Steps Which Have Been Taken To Avoid Further Violation:

1. On March 31, 1981, F&M initiated qualification of welding procedure AWS-1A. The welding process and record was incorporated into CP-403S3, Revision 4, "Welding of Steel Structures," on April 1, 1981.
2. On April 21, 1981, F&M noted that AWS-1A was not qualified in accordance with code requirements and necessitated requalification of the procedure. Between April 1 - April 21, no unqualified welds were performed.

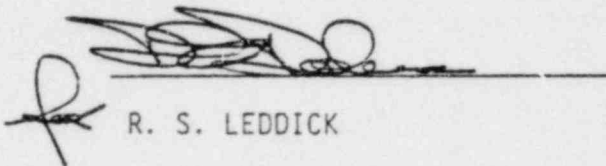
3. On April 28, 1981, F&M requalified welding procedure AWS-1A and incorporated this record in Revision 5 of CP-403S3, on May 1, 1981.

Date When Full Compliance Will Be Achieved:

CP-403S3, Revision 5, was approved on May 8, 1981. Training of F&M personnel and craft will be accomplished by June 1, 1981.

R. S. LEDDICK, Being first duly sworn, deposes and says: That he is the Program Director, WNP-3/5, for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that he is authorized to submit the foregoing on behalf of said applicant; that he has read the foregoing and knows the contents thereof; and believes the same to be true to the best of his knowledge.


DATED May 26, 1981.


R. S. LEDDICK

STATE OF WASHINGTON)
) ss
COUNTY OF GRAYS HARBOR)

On this day personally appeared before me R. S. LEDDICK to me known to be the individual who executed the foregoing instrument and acknowledged that he signed the same as his free act and deed for the uses and purposes therein mentioned.

GIVEN under my hand and seal this 26th day of May, 1981.


Notary Public in and for the State
of Washington
Residing at Elma