

**Vogtle Project**

Georgia Power Company
Post Office Box 4545
Atlanta, Georgia 30302
Telephone 404 522-6060

Southern Company Services, Inc.
Post Office Box 2625
Birmingham, Alabama 35202
Telephone 205 870-6011

June 8, 1981

United States Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 3100
101 Marietta Street
Atlanta, GA 30303

Reference:
IE: II: BRC
50-424/81-05
50/426/81-05

Attention: Mr. R. C. Lewis

File: X7BG10
Log: GN-134

Gentlemen:

The Georgia Power Company wishes to submit the following information concerning the violations discussed in your inspection report 50-424/81-05 and 50-425/81-05.

We concur with the finding identified concerning failure to follow welding procedure purge requirements. The welder failed to properly control gas flow for back purge as required by procedure. A non-conformance report has been initiated to disposition the weld. The procedure was reviewed and found to be adequate. The contractor reminded welding supervision to enforce conformance with procedures. Full compliance was achieved May 28, 1981.

We concur with the finding identified concerning failure to follow storage procedure requirements. The frequency of our inspection program in this area has not been adequate in the past. The identified items along with previously identified Georgia Power items have been corrected. Quality Control has been requested to increase their efforts in this area of inspection. Full compliance was achieved June 5, 1981.

We concur with the finding identified concerning inadequate measures to control handling of safety-related material or equipment. Georgia Power had a procedure for control of handling material and equipment, but it was inadequate and was withdrawn. The contractors were designated to conduct inspections, but Georgia Power Company did not follow up on the program implementation. The inspection program has been discussed with contractors and is being reviewed and updated. The previously deleted procedure has been re-issued for review and revision as needed. A rigging program will be re-implemented and maintained. Full compliance should be obtained by August 28, 1981.

Mr. R. C. Lewis
United States Nuclear Regulatory Commission
June 8, 1981
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Neither the inspection report nor this reply contains any proprietary information and may be placed in the NRC's Public Document Room.


Very truly yours,



Doug Dutton
Project General Manager

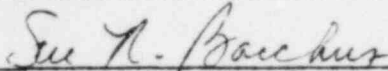
Doug Dutton states that he is Project General Manager of Georgia Power Company's Vogtle Project and is authorized to execute this oath on behalf of Georgia Power Company and that to the best of his knowledge and belief the facts set forth in this letter are true.

GPC:



Doug Dutton

Sworn to and subscribed before me this 8th day of June, 1981.



Notary Public, Georgia, State at Large
My Commission Expires March 21, 1985

Mr. R. C. Lewis
United States Nuclear Regulatory Commission
June 8, 1981
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xc: U. S. Nuclear Regulatory Commission
Attn: Victor J. Stello, Jr., Director
Office of Inspection and Enforcement
Washington, D.C. 20555

J. H. Miller, Jr.
W. E. Ehrensperger
F. G. Mitchell, Jr.
R. J. Kelly
C. F. Whitmer
R. E. Conway
D. E. Dutton
H. C. Nix
R. W. Staffa
K. M. Gillespie
L. T. Gucwa
C. R. Miles, Jr.
E. D. Groover
D. L. McCrary
R. A. Thomas
O. Batum
J. A. Bailey
M. Z. Jeric
B. L. Lex



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA ST., N.W., SUITE 3100
ATLANTA, GEORGIA 30303

OFFICIAL COPY

CMH

MAY 13 1981

Georgia Power Company
ATTN: J. H. Miller, Jr.
Executive Vice President
270 Peachtree Street
Atlanta, GA 30303

Gentlemen:

Subject: Report Nos. 50-424/81-05 and 50-425/81-05

This refers to the routine inspection conducted by Mr. W. P. Kleinsorge of this office on April 20-22, 1981, of activities authorized by NRC Construction Permit Nos. CPPR-108 and CPPR-109 for the Vogtle facility. Our preliminary findings were discussed with Mr. K. M. Gillespie at the conclusion of the inspection.

Areas examined during the inspection and our findings are discussed in the enclosed inspection report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector.

During the inspection, it was found that certain activities under your license appear to violate NRC requirements. These items and references to pertinent requirements are listed in the Notice of Violation enclosed herewith as Appendix A. Elements to be included in your response are delineated in Appendix A.

We have examined actions you have taken with regard to previously identified enforcement matters. These are discussed in the enclosed inspection report.

In accordance with Section 2.790 of the NRC "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosed inspection report will be placed in the NRC Public Document Room. If this report contains any information that you believe to be proprietary, it is necessary that you make a written application within 20 days to this office to withhold such information from public disclosure. Any such application must include the basis for claiming that the information is proprietary and the proprietary information should be contained in a separate part of the document. If we do not hear from you in this regard within the specified period, the report will be placed in the Public Document Room.

done 8/05/82 JH


MAY 13 1981

Georgia Power Company

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Should you have any questions concerning this letter, we will be glad to discuss them with you.

Sincerely,

for 
R. C. Lewis, Acting Director
Division of Resident and
Reactor Project Inspection

Enclosures:

1. Appendix A, Notice of Violation
2. Inspection Report Nos. 50-424/81-05,
and 50-425/81-05

cc w/encl:

- K. M. Gillespie, Construction
Project Manager
- E. D. Groover, QA Site Supervisor
- D. E. Dutton, Project General Manager

APPENDIX A

NOTICE OF VIOLATION

Georgia Power Company
Vogtle 1 and 2

Docket Nos. 50-424, 425
License Nos. CPPR-108, 109

As a result of the inspection conducted on April 20-22, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified.

- A. 10 CFR 50, Appendix B, Criterion V as implemented by paragraph 17.1.5 of the PSAR requires activities affecting quality be accomplished in accordance with documented procedures. Pullman Power Products General Welding Information Requirements, dated January 31, 1981, require that back purge flow rate during welding be approximately 20 cubic feet per hour.

Contrary to the above, on April 21, 1981 activities affecting quality were not accomplished in accordance with documented procedures in that the back purge flow rate was in excess of 70 cubic feet per hour during the welding of the root layer on containment spray system weld joint 03-W-02.

This is a Severity Level V Violation (Supplement II.E.). This violation applies to Unit 1 only.

- B. 10 CFR 50, Appendix B, Criterion V as implemented by paragraph 17.1.5 of the PSAR requires activities affecting quality be accomplished in accordance with documented procedures. GPC specification X4AZ01 Division P1 revision 4 section P1.6.2 requires carbon steel piping assemblies to be stored such that they are free draining with upward protruding vertical branches provided with covers or rain hoods. Section P1.6.2 further requires that flange ends be provided with bolted wooden protective disks. Section P1.6.3 requires that stainless steel piping assemblies be capped and stored on dunnage to prevent contact with ground water.

Contrary to the above, on April 21, 1981, activities affecting quality were not accomplished in accordance with documented procedures in that the following the examples were noted:

1. Numerous carbon steel piping assemblies contained standing water.
2. Numerous carbon steel piping assemblies had uncapped or unhooded open upward protruding vertical branches.
3. Several flanged carbon steel piping assemblies had no protective covers on the flange surfaces.
4. Several stainless steel piping assemblies had missing protective end caps.

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5. Several stainless steel piping assemblies were off dunnage in contact with mud.

This is a Severity Level VI Violation (Supplement II.F.).

- C. 10 CFR 50, Appendix B, Criterion XIII as implemented by paragraph 17.1.13 of the PSAR requires measures be established to control the handling of material and equipment in accordance with work and inspection instructions to prevent damage. ANSI N45.2.2-1972, "Packaging, Shipping, Receiving, and Handling of Items for Nuclear Power Plants (During the construction phase)" has been identified as the applicable standard for material and equipment handling. ANSI N45.2.2 paragraph 7.4 requires an inspection program be established for rigging and a system be established that will indicate acceptability of all rigging after each inspection.

Contrary to the above, on April 21, 1981, adequate measures were not established to control handling of material and equipment in accordance with work and inspection procedures in that the licensee has no documented program for the inspection of rigging slings or chokers used for handling safety-related materials or equipment.

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

Pursuant to the provisions of 10 CFR 2.201, you are hereby required to submit to this office within twenty-five days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged violations; (2) the reasons for the violations if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation.

Date: **MAY 13 1981**



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA ST., N.W., SUITE 3100
ATLANTA, GEORGIA 30303

Report Nos. 50-424/81-05 and 50-425/81-05

Licensee: Georgia Power Company
270 Peachtree Street
Atlanta, GA 30303

Facility Name: Vogtle

Docket Nos. 50-424 and 50-425

License Nos. CPPR-108 and CPPR-109

Inspection at Vogtle site near Waynesboro, GA

Inspector:

W. P. Kleinsorge
W. P. Kleinsorge

May 17, 1981

Date Signed

Approved by:

B. E. Crowley
A. R. Herdt, Section Chief

Engineering Inspection Branch
Engineering and Technical Inspection Division

5/7/81

Date Signed

SUMMARY

Inspected on April 20-22, 1981

Areas Inspected

This routine, unannounced inspection involved 19 inspector-hours onsite in the areas of licensee action on previous inspection findings (Units 1 and 2), safety-related piping (Units 1 and 2), steel structures and supports (Units 1 and 2) and status of IE Bulletins (Units 1 and 2).

Results

Of the three areas inspected, no violations or deviations were identified in two areas; three violations were found in one area (Violation - "Failure to follow welding procedure purge requirements" - paragraph 6.b.(1), Violation - "Failure to follow storage procedure requirements" - paragraph - 6.a.(2) and, Violation - "Inadequate measures to control handling of safety related materials or equipment" - paragraph 6.a.(3)).

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REPORT DETAILS

1. Persons Contacted

Licensee Employees

- *K. M. Gillespie, Project Manager
- *E. D. Groover, QA Site Supervisor
- *R. W. McManus, Manager QC
- *M. H. Googe, Manager of Field Operations
- *R. R. Allen, Assistant Construction Product Manager
- *C. W. Hayes, PQAM
- *G. R. McCarley, APPS - Mechanical
- *B. F. Barnett, Sr. QA Field Representative

Other licensee employees contacted included construction craftsmen, technicians, and office personnel.

Other Organizations

- *J. P. Runyan, QA Manager, Pullman Power Products (PPP)
- *J. E. Mahlmeister, Resident Engineer, Bechtel Power Corp. (BPC)
- *W. A. House, Resident Engineer "N" Stamp, BPC

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on April 22, 1981 with those persons indicated in paragraph 1 above. The inspector described the areas inspected and discussed in detail the inspection findings listed below. No dissenting comments were received from the licensee.

(Open) Violation 424/81-05-01: "Failure to Follow Welding Procedure Purge Requirements" - paragraph No. 6.b.(1).

(Open) Violation 424, 425/81-05-02: "Failure to Follow Storage Procedure Requirements" - paragraph No. 6.a.(2).

(Open) Violation 424, 425/81-05-03: "Inadequate Measures to Control Handling of Safety Related Materials or Equipment" - paragraph No. 6.a.(3).

(Open) Inspector Followup Item 424, 425/81-05-04: "Clear Distance Between Parallel Reinforcing Bar Splices" - paragraph 5.b.

Licensee Action on Previous Inspection Findings (Units 1 and 2)

a. (Closed) Violation 424, 425/81-02-02: "Welder Qualification Controls"

Georgia Power Company letters of response dated March 11 and 20, 1981, have been reviewed and determined to be acceptable by Region II. The inspector held discussions with the project manager and examined the corrective actions as stated in the letter of response. The inspector concluded that Georgia Power Company had determined the full extent of the subject noncompliance, performed the necessary survey and follow-up actions to correct the present conditions and developed the necessary corrective actions to preclude recurrence to similar circumstances. The corrective actions identified in the letters of response have been implemented.

b. (Closed) Violation 424, 425/81-02-03: "Weld Rod Control"

Georgia Power Company letters of response dated March 11 and 20, 1981 have been reviewed and determined to be acceptable by Region II. The inspector held discussions with the project manager and examined the corrective actions as stated in the letters of response. The inspector concluded that Georgia Power Company had determined the full extent of the subject noncompliance, performed the necessary survey and follow-up actions to correct the present conditions and developed the necessary corrective actions to preclude recurrence of similar circumstances. The corrective actions identified in the letters of response have been implemented.

c. (Closed) Violation 424, 425/81-04-02: "Failure to Follow Procedure for Controlling Nonconforming Items"

Georgia Power Company letter of response dated April 1, 1981 has been reviewed and determined to be acceptable by Region II. The inspector held discussions with the project manager and examined the corrective actions as stated in the letter of response. The inspector concluded that Georgia Power Company had determined the full extent of the subject noncompliance, performed the necessary survey and follow-up actions to correct the present conditions and developed the necessary corrective actions to preclude recurrence of similar circumstances. The corrective actions identified in the letter of response have been implemented.

4. Unresolved Items

Unresolved items were not identified during this inspection.

5. Independent Inspection Effort (Units 1 and 2)

a. Construction Progress

The inspector conducted a general inspection of the Units 1 and 2 containment construction sites, auxiliary building, PPP pipe fabrication shop, and the piping assembly lay down yard to observe construction progress and construction activities such as welding, nondestructive examination, material handling and control, housekeeping and storage.

b. Reinforcing Steel Placement

During the general inspection above, the inspector accompanied by a representative of the licensee noted nine examples of the clear distance between parallel lap splices in a layer to be less than one inch. American Concrete Institute Standard 318-1971 "Building Code Requirements for Reinforced Concrete", Section 7.4.5 requires that the clear distance between parallel lap splices or parallel lap splice and adjacent bars be no less than one inch. The inspector determined that the condition described above was still in the erection stage and had not yet received a QC acceptance inspection. Vogtle Plant Specification X2AP01, Division C3, Section No. C3.4 "Placing Reinforcing Steel", Revision 6 only addresses the clear distance between bars and not splices. The licensee indicated that they would look further into the matter. The inspector stated that the above would be an inspector followup item identified as 424, 425/81-05-04: "Clear Distance Between Parallel Reinforcing Bar Splices".

Within the area examined no violations or deviations were identified.

6. Safety-Related Piping (Units 1 and 2)

The inspector observed non-welding and welding work activities for safety-related piping as described below to determine whether applicable code and procedure requirements were being met. The applicable code for safety-related piping is the ASME B and PV Code, Section III, Subsection NC and ND 1977 Edition with addenda through Winter 1977.

a. Observation of Non-Welding Activities

Observation of specific work activities were conducted to determine conformance, where applicable, with the following; inspection and/or work procedures, record keeping, installation specifications or plans, specified materials, specified NDE, calibration and use of proper test equipment and qualified inspection and NDE personnel.

<u>Activity</u>	<u>System or Component</u>	<u>Unit</u>	<u>Procedure</u>
Storage	Various	1 & 2	Specification No. X4AZ01 Division P1, Revision 4
Handling	Various	1 & 2	See Paragraph 6.a.(3)

- (1) With regard to the storage inspection above the inspector noted the licensee's program for the storage of carbon steel piping assemblies deviates from their PSAR commitment to Regulatory Guide 1.38 for material storage. Regulatory Guide 1.38 endorses ANSI N45.2.2-1972. ANSI N45.2.2 requires that items in storage shall have all covers, caps or other closures intact. GPC Specification X4AZ01 Division P1, Revision 4 requires that the pipe caps on carbon steel piping assemblies be removed before storage. This deviation is documented in Vogtle Licensing Document Deviation, PSAR Deviation No. P16 dated April 21, 1980, and submitted to Southern Company Services, Inc. by Bechtel Power Corp. letter dated April 22, 1980 for incorporation into the FSAR, when issued.
- (2) With regard to the storage inspection above, the inspector accompanied by a representative of the licensee, made an inspection of pipe spool laydown areas, to determine whether pipe storage was accomplished in accordance with applicable procedures. On April 21, 1981, the inspector noted the following:
 - (a) Numerous carbon steel piping assemblies containing standing water.
 - (b) Numerous carbon steel piping assemblies without caps or rain hoods on upward protruding open vertical branches.
 - (c) Several carbon steel flanged piping assemblies without protective covers on the flange surfaces.
 - (d) Several stainless steel piping assemblies missing protective end caps.
 - (e) Several stainless steel piping assemblies off dunnage in contact with mud.

Specification No. X4AZ01, Division P1, Revision 4, Section P.1.6 provides the general requirements for storage safety-related and balance of plant piping assemblies and components. The licensee stores all piping assemblies as if they were intended for safety-related applications.

Section P1.6.2 requires carbon steel piping assemblies to be stored so they are free draining with upward protruding vertical branches provided with covers or rain hoods. Section P1.6.2 further requires that flange ends be provided with bolted wooden protective disks. Section P1.6.3 requires that stainless steel piping assemblies be capped and stored on dunnage to prevent contact with ground water. Therefore procedures were not followed for the storage of piping assemblies. Failure to follow procedures for activities affecting quality is in violation of 10 CFR 50, Appendix B, Criterion V. The above violation will be identified as 424, 425/81-05-02: "Failure to Follow Storage Procedure Requirements".

- (3) With regard to material handling, the inspector noted, on April 21, 1981, that the licensee did not have a documented program established for the inspection of rigging slings or chokers used for handling safety-related materials or equipment. ANSI N45.2.2-1972, "Packaging Shipping, Receiving and Handling of Items for Nuclear Power Plants (During the Construction Phase)" has been identified as the applicable standard for material and equipment handling. ANSI N45.2.2, paragraph 7.4 requires an inspection program be established for rigging and a system be established that will indicate acceptability of all rigging after each inspection. Therefore the licensee has not established adequate measures to control the handling of materials and equipment. Failure to establish adequate measures to control the handling of materials and equipment by work and inspection procedures to prevent damage is in violation of 10 CFR 50, Appendix B, Criterion XIII. The above violation will be identified as 424, 425/81-05-03: "Inadequate Measures to Control Handling of Safety Related Material, or Equipment".

b. Observation of Welding Activities

The inspector observed in-process welding activities of safety-related piping field welds as described below to determine whether applicable code and procedure requirements were being met.

(1) Welding

The below listed welds were examined in process to determine work conducted in accordance with traveler; welder identification and location; welding procedure assignment; welding technique and sequence; materials identity; weld geometry; fit-up; temporary attachments; gas purging; preheat; electrical characteristics; shielding gas; welding equipment condition; interpass temperature; interpass cleaning; process control systems; identity of welders; qualification of inspection personnel; and weld history records.

<u>Weld No.</u>	<u>ISO Number</u>	<u>Unit</u>	<u>Size</u>	<u>System</u>
E	1K3-1208-099-02	1	3"sch 160	Chemical and Volume Control
038-W-05	1K3-1206-004-01, R1	1	10"x0.365"	Containment Spray
038-W-02	1K3-1206-004-01	1	14"x0.438"	Containment Spray
003-W-01	2K3-1205-003-01	2	14"x0.438"	Residual Heat Removal

With regard to the above inspection, the inspector accompanied by a representative of the licensee, on April 21, 1981, noted that the flow meter ball for the back purge on containment spray system weld joint 038-W-02, during root welding was pegged at the top of the site glass indicating a flow rate far in excess of 70 CFH. Pullman Power Products General Welding Information Requirements, dated January 31, 1981, specifies that back purge shall be approximately 20 CFH. Therefore the welder of record for joint 038-W-02 did not follow the welding procedure. Failure to follow procedure for activities affecting quality is in violation of 10 CFR 50, Appendix B, Criterion V. The above violation will be identified as 424/81-05-01: "Failure to Follow Welding Procedure Purge Requirements".

(2) Welder Qualification

The inspector reviewed the PPP and CB&I programs for qualification of welders and welding operators for compliance with QA procedures and ASME Code requirements. The applicable Code for welding qualification is ASME B&PV Code Section IX as invoked by GPC Specifications X2AG06 Rev. 4 and X4AZ01, Section P.1, Revision 8.

The following welder qualification status records and "Records of Performance Qualification Test" were reviewed relative to the weld joints listed in paragraphs 6.b and 7.a.

<u>Welder Symbol</u>	<u>Unit</u>	<u>Organization</u>	<u>Application</u>
CD	1	PPP	Safety-Related Piping
R1	1	PPP	Safety-Related Piping
AS	1	PPP	Safety-Related Piping

<u>Welder Symbol</u>	<u>Unit</u>	<u>Organization</u>	<u>Application</u>
B7	2	PPP	Safety-Related Piping
RJH	1	CB&I	Steel Structures & Supports
CJM	1	CB&I	Steel Structures & Supports
DCT	1	CB&I	Steel Structures & Supports
JTL	1	CB&I	Steel Structures & Supports
RCC	2	CB&I	Steel Structures & Supports
LDW	2	CB&I	Steel Structures & Supports

(3) Welding Filler Material Control

The inspector reviewed the CB&I and PPP programs for control of welding materials to determine whether materials are being purchased, accepted, stored, and handled in accordance with QA procedures and applicable code requirements. The following specific areas were examined:

- Purchasing procedure receiving, storing, distributing and handling procedures, material identification.
- Welding material purchasing and receiving records for the following materials were reviewed for conformance with applicable procedures and code requirements:

<u>Process*</u>	<u>Type</u>	<u>Size</u>	<u>Heat Lot or Batch No.</u>	<u>Application</u>
SMAW	E-308-16	3/32"	2598267	Safety-Related Piping
GTAW	ER-308L	3/32"	741872	Safety-Related Piping
GTAW	ER-308L	1/8"	760284	Safety-Related Piping
GTAW	ER-308L	1/16"	713589	Safety-Related Piping
GTAW	ER-308L	1/16"	26245	Safety-Related Piping
GTAW	ER-308L	3/32"	05394	Safety-Related Piping
GTAW	ER-308L	1/8"	05394	Safety-Related Piping
SMAW	7018	1/8"	RRR-074	Steel Structures & Supports

<u>Process*</u>	<u>Type</u>	<u>Size</u>	<u>Heat Lot or Batch No.</u>	<u>Application</u>
SMAW	7018	5/32"	RRR-090	Steel Structures & Supports
SMAW	7018	3/16"	RRR-079	Steel Structures & Supports

*SMAW - Shielded Metal Arc Welding
GTAW - Gas Tungsten Arc Welding

Within the areas examined, no violations or deviations were identified except as described in paragraph Nos. 6.a.(2), 6.a.(3) and 6.b.(1).

7. Steel Structures and Supports (Units 1 and 2)

The inspector observed welding work activities for steel structures and supports as described below to determine whether applicable code and procedure requirements were being met. The applicable code for containment fabrication is the ASME B&PV Code, Section III 1974 edition with addenda through summer 75, and Section VIII 1974 edition with addenda through Summer 75. The inspector observed in-process welding activities of containment structural field welds as described below to determine whether applicable code and procedure requirements were being met.

a. Welding

The following welds were examined in process to determine work conducted in accordance with traveler; welding procedures available; welding technique and sequence; weld geometry; fit-up electrical characteristics; equipment condition:

<u>Structure</u>	<u>Unit</u>	<u>Location or Identification</u>
Containment	1	4th to 5th Ring Increment 5
Containment	1	4th to 5th Ring Increment 2
Containment	1	4th to 5th Ring Increment 4
Containment Stiffener	1	5th Ring
Containment Leak Chase	2	Seam B-3
Containment Leak Chase	2	Seam B-21

b. Welder Qualification

Welder Qualification is discussed in paragraph 6.b.(2).

c. Welding Filler Material Control

Welding filler material control is discussed in paragraph 6.b.(3).

Within the areas examined, no violations or deviations were identified.

8. Status of IE Bulletins (IEB's) (Units 1 and 2)

(Closed) IEB 424/425/80--BU-21: Valve Yokes Supplied by Malcolm Foundry Company, Inc. The licensee's response letter for this bulletin, dated December 30, 1980, has been received and reviewed by Region II. The letter response indicates that the licensee's active valves do not contain parts cast by Malcolm Foundry. This issue is considered closed based on the letter response.