

Washington Public Power Supply System

Box 1223 Elma, Washington 98541 (206) 482-4428

Docket No. 50-508

February 16, 1983
G03-83-151

U. S. Nuclear Regulatory Commission, Region V
Office of Inspection and Enforcement
1450 Maria Lane, Suite 260
Walnut Creek, California 94596-5368

Attention: Mr. D. M. Sternberg, Chief
Reactor Projects Branch No. 1

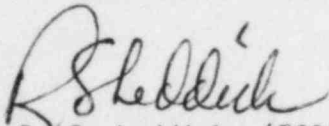
Subject: NRC INSPECTION AT WNP-3
IE REPORT NO. 50-508/82-25

Reference: NRC Letter, Mr. D. M. Sternberg to Mr. R. S. Leddick,
NRC Inspection at Washington Nuclear Project No. 3
(WNP-3), dated January 17, 1983.

The referenced letter reported the results of the NRC inspection conducted December 13-17, 1982. Attached is the Supply System's response to the Item of Noncompliance contained in the letter.

The Supply System does not concur with the NRC that the activities described in the Item of Noncompliance are in violation with 10CFR50, Appendix B. We desire to discuss and resolve our apparent differences on this matter through any forum you deem most appropriate.

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



R. S. Leddick (760)
Program Director, WNP-3

JAP:nj

Attachment

cc: Mr. J. Adams - NESCO
Mr. D. Smithpeter - BPA
Ebasco - New York
WNP-3 Files - Richland

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REGION V FILE

Attachment to: Letter, G03-83-151, dated February 16, 1983.

VIOLATION 50-508/82-25-02

10CFR50, Appendix B, Criterion V, states, in part, that: "Activities affecting quality shall be prescribed by...procedures...and shall be accomplished in accordance with these...procedures." Criterion XVII of Appendix B states, in part, that: "Sufficient records shall be maintained to furnish evidence of activities affecting quality."

Paragraph 17.1.5 of the Quality Assurance Program documented in approved PSAR Deviation No. 26-WP, states, in part, that "Contractors and vendors, including Ebasco...are required to have written...procedures...which govern their quality related activities..."

Paragraph 17.1.17 of the Quality Assurance Program documented in approved PSAR Deviation No. 26-WP, states, in part, that, "Quality Assurance records are utilized to verify that activities affecting quality have occurred, and that they have been performed in compliance with specified requirements."

The ASME Boiler and Pressure Vessel Code, Section III, 1977 Edition including addenda through Summer-1978, Figure NC-4427-1 requires the presence of a 1/16-inch gap in socket-welded connections before welding.

Contrary to the above, Peter Kiewit Sons Company is presently installing safety-related socket-welded pipe fittings without a procedure which describes the methods to assure that the required 1/16-inch gap exists before welding. Records are not established to provide objective evidence that the required 1/16-inch gap is present in socket welded connections.

Supply System Response

The Supply System does not concur that the above described activities are in violation with 10CFR50, Appendix B. The rationale of our conclusion is described below:

Peter Kiewit's program for socket weld fitup is as follows:

Welding procedures specify socket weld fitup requirements by use of a figure which specifically calls out the 1/16-inch minimum root gap.

Craftsmen receive training in general welding requirements including the establishment of the socket weld root gap.

For every Quality Class I socket weld, the craftsman documents establishment of the 1/16-inch gap by his initials and date in the "Fitup" block on the "Weld Activity Check Stamp" sheet.

Two kinds of Peter Kiewit Quality Control Surveillance Inspections are performed and documented for these welds.

VIOLATION 50-508/82-20-02 (Continued)

Supply System Response (Continued)

- a) Random (unscheduled) surveillances wherein the inspector verifies the root gap and initials the "Fitup" block on the "Weld Activity Check Stamp" sheet.
- b) Pre-scheduled surveillance inspections wherein the Inspector verifies the root gap and signs the 1/16-inch minimum root gap verification block on a "Quality Assurance Surveillance Report" checklist. Over a two month period chosen for review, 33 pre-scheduled surveillances, which included socket weld fitup verifications, were conducted with no discrepancies being detected. These surveillances accounted for approximately 25% of the Quality Class I socket welds made during this period.

Criterion V of 10CFR50, Appendix B, requires that "Quality Affecting Activities be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances." The Supply System contends that the socket fitup "Drawings" on existing Peter Kiewit Welding Procedures adequately address the requirement for the 1/16-inch minimum socket weld root gap and are appropriate for the circumstances. In addition, the governing PKS Procedure specifies that the "Weld Activity Check Stamp" provides the record of craft acceptance for joint fitup.

Criterion XVII of 10CFR50, Appendix B, requires that "Sufficient Records shall be maintained to furnish evidence of activities affecting Quality." The craftsman's initials and date in the fitup block provide documented objective evidence that the 1/16-inch minimum root gap has been established on each joint. The Quality Control Surveillance programs described above provide verification of the fitup on a substantial percentage of the socket welds. The craftsman's confirmation and Quality Control surveillance verifications are considered sufficient documentation of the quality affecting activity.