

USNRC REGION II
ATLANTA, GEORGIA

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July 22, 1983
L-83-422

James P. O'Reilly
Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street NW, Suite 2900
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Re: St. Lucie Unit No. 2
Docket No. 50-389
Inspection Report 83-26

Florida Power & Light Company has reviewed the subject inspection report and a response is attached.

In the subject inspection report, you indicated concern that actions taken by FPL in response to a Notice of Violation, regarding inadequate measures to control welding and nondestructive testing of welds, were insufficient to preclude further noncompliance in the same functional area.

In response to your concern, to prevent recurrence of similar noncompliances, all safety-related or seismic welding and associated nondestructive testing of welds is now being accomplished under FPL's Backfit Program. This program includes the ability to trace a nonunique weld or series of welds to a specific weld material through the individual inspection performed by Quality Control, utilizing the applicable nonunique Weld Inspection Report. The Quality Control organization places specific nonunique weld identification on marked-up "Approved for Construction" drawings, or by referencing drawing coordinates or component boundaries for each nonunique weld and recording them in the Inspection Report associated with that weld traveler.

As a result of this action, we are not experiencing these types of welding and nondestructive testing noncompliances on the St. Lucie Backfit Program.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Robert E. Uhrig", is written over a horizontal line.

Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/RJS/cab

Attachment

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PDR ADOCK 05000389
Q PDR

ATTACHMENT

RE: ST. LUCIE UNIT 2
DOCKET NO. 50-389
INSPECTION REPORT 83-26

FINDING

10 CFR 50, Appendix B, Criterion V, as implemented by Section 5.0 of FPL Topical Quality Assurance Report, requires in part that activities affecting quality shall be prescribed by documented instructions, procedures, and drawings and shall be accomplished in accordance with these instructions, procedures, and drawings. Paragraph 5.2 of QI 17.5, "Instructions for Civil Turnover at St. Lucie", the applicable procedure for final inspection of LPSI and Containment Spray Pump Supports, requires that inspections be performed in accordance with the applicable QIs and that as-found conditions be documented on applicable inspection reports. Paragraph 5.3 of QI 9.1, "Visual Inspections of Welds", the applicable QI for visual inspection of welds, requires that the inspector make certain that the size of all welds conforms to requirements.

Contrary to the above, on March 31, 1983, activities affecting quality were not accomplished in accordance with prescribed procedures in that LPSI Pump 2B and Containment Spray Pump 2A support welds (Gussett Plate Welds) up to 1/4" undersize had been accepted. LPSI Pump 2B support welds had been inspected in accordance with QI 9.1, documented as being 1/16" undersize, and accepted based on engineering review. Containment Spray Pump 2A welds had been inspected in accordance with QI 9.1 and accepted.

RESPONSE:

1. FPL concurs with the finding.
2. The reason for the finding is personnel error in that the welds in question were erroneously accepted as per design documents in 1979, reinspected by another QC inspector in 1983, documented as unacceptable but without listing as-found dimensions, and a QC Supervisor then erroneously noting the discrepant dimensions without verifying them.

As part of the construction completion program, the LPSI pump 2B and containment spray (CS) pump 2B support (Gussett Plate) welds were reinspected on February 7, 1983 and the results documented on inspection reports (IRs) CC83-0417 and CC83-0420, respectively. At this time, the inspector noted that the welds were undersized and unacceptable per the design drawing but he did not note actual as-found dimensions.

Subsequent to the inspections, the IRs were sent to the NCR Review Board of evaluation and disposition. The Board, lacking actual dimensions, requested them from the QC Department. A QC supervisor erroneously indicated that the subject welds were 1/16" undersized. Based on this information, which the Board had no reason to question, an engineering evaluation determined that the welds, though undersized, were adequate as is.

3. As corrective action, all support welds for the subject pumps plus those for CS Pump 2B and LPSI Pump 2A were reinspected, with detailed as-found dimensions noted on the inspection reports. The reinspection resulted in nonconformance report 7019C, 7023C, 7032C and 7033C being issued. The undersized weld conditions were evaluated by Engineering, found to be still acceptable and the NCRs were dispositioned "Use As Is".

In addition, work of the QC inspector, who originally accepted the subject welds in 1979, was reinspected. A total of 38 welds were rechecked and in no case were the results in conflict with his original inspection reports.

The QC Supervisor was counselled on ensuring that inspection reports list actual as-found dimensions on discrepant conditions, and if they did not, to have the dimensions retaken and appended to the reports.

4. In order to avoid further problems, inspection personnel have been instructed to list actual as-found dimensions when documenting discrepancies. Future nonunique structural welding will be performed under the QC Backfit Program which will utilize specific process sheets, with inspection hold points requiring sign-off by QC personnel.

All inspectors performing inspections of structural welds will undergo additional training in the taking and documenting of correct weld dimensions.

- 5) Full compliance has been achieved by July 20, 1983.