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ANTA, GEORGIA



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July 22, 1982
L-82-302

Mr. James P. O'Reilly
Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

RE: RII:JLC
St. Lucie Unit 2
Docket No. 50-389/82-20

Dear Mr. O'Reilly:

Florida Power and Light Company has reviewed the subject Inspection Report which identified the following violation: "Failure to Follow Procedure for Marking and Inspection of Pipe Engagement into Socket Fittings". Please find attached our response to this violation.

Very truly yours,

A handwritten signature in cursive script, reading "Robert E. Uhrig".

Robert E. Uhrig
Vice President
Advanced Systems and Technology

REU/PPC/cab

Attachments

cc: Harold F. Reis, Esquire

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FDR ADOCK 05000389
Q PDR

Violation: "Failure to Follow Procedure for Marking and Inspection of
Pipe Engagement into Socket Fittings"

10CFR50, Appendix B, Criterion V, as implemented by Section TQR 5.0 of FP&L Topical Report FPL TQAR-1-76A, 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 or drawings. Paragraph 4.1.2 of FP&L procedure QI-9.1 and attachment 4.2 of procedure SQP-47, the applicable procedure for erection and inspection of socket welds, requires that scribe lines be marked, (1) on the socket fitting $3/8$ " from the face of the fitting, (2) on the pipe at a distance of the socket depth minus $1/16$ ", and (3) on the pipe $1-1/8$ " from the line in (2), in order to assure that the $1/16$ " minimum clearance between the bottom of the socket and the end of the pipe is met.

Contrary to the above, on May 12, 1982, activities affecting quality were observed that had not been accomplished in accordance with documented procedures in that completed reactor coolant system socket weld joint numbers RC-181-009, RC-181-010, RC-181-013, RC-175-014, RC-175-016, and RC-175-017 did not have scribe marks on the socket fittings at $3/8$ " and the scribe marks for verifying pipe withdrawal were observed on the piping at 1" to $1-1/32$ " from the face of the fittings.

This is a severity Level V violation (supplement II.E)

Response:

- 1) FPL agrees with the finding.
- 2) Construction failed to comply with the requirements of SQP-47, in the correct application of scribe lines.
- 3) RC-181-009, RC-181-010, and RC-181-013, were radiographed on 5/18/82 during the NRC visit verifying that socket engagement was correct. RC-175-014, RC-175-016, and RC-175-017, were radiographed on 7/16/82 to re-verify fitup inspections performed prior to welding. Engagement was also proper on these welds.

In addition to this finding and initiated earlier due to previous NRC and licensee findings in this area, QC had developed a reinspection program for safety related welds to verify the following on a sampling basis:

- a) Fillet weld size and sockets and fittings.
- b) Presence of scribe lines in the weld heat affected zone.

Response: (Continued)

- c) Correct application of scribe lines for socket engagement per the requirements of SQP-47.
- d) Proper 3 to 1 taper for large bore welds.

The initial portion of this reinspection is complete and is presently being evaluated. In addition, per engineering direction, cases of inadvertant omissions of the required scribe lines will be documented by QC and the gap verified by radiography of the connection.

- 4) To prevent recurrence, the following actions have been taken:
 - a) All weld travelers will be recalled from the field and QC fitup inspections initiated on all socket welds.
 - b) The SQP will be revised to change the present requirement for scribe lines to a single mark on the pipe at the face of the fitting prior to pull back, verified during the QC fitup inspection.
 - c) Construction personnel will be instructed on the above change and the need to check each traveler for the added hold points.
- 5) Full compliance will be achieved by August 30, 1982.