

USNRC REGION II
ATLANTA, GEORGIA

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March 11, 1982
L-82-88

Mr. James P. O'Reilly
Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, Suite 300
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Re: RII:WPK
St. Lucie Unit #2
Docket No. 50-389/81-25

On February 25, 1982, (L-82-63) Florida Power & Light Company provided a response to the NRC's inspection report No. 50-389/81-25. Subsequently, during a telephone conference call on March 4, 1982 between Mr. W. Klein-sorge (NRC), H. Dance (NRC) and FPL representatives additional clarifying information was provided to the NRC regarding violation B and C of the subject report. This clarification is formally submitted in the attachment to this letter.

Very truly yours,

Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/JAD/ga

Attachment

cc: Director of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Harold F. Reis, Esquire

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PDR ADOCK 05000389
Q PDR

ATTACHMENT

RII:WPK
50-389/81-25

VIOLATION B: FAILURE TO PROVIDE CHANGES OF DRAWINGS
TO THE LOCATION OF FABRICATION

10CFR 50, Appendix B, Criterion VI as implemented by Section 6 of the FP&L Topical Report (FP&L-TQAR-1-76A) requires measures be established to control the issuance of drawings including changes to assure that drawings are distributed and used at the location where activities affecting quality are accomplished.

Contrary to the above, on December 17, 1981, measures were not adequate to control the issuance of drawings including change to assure changes are distributed to fabrication locations in that Conax drawing for electrical penetration D-1 identified by EBASCO no. 2998-488, Revision 5 marked "Proceed With Fabrication" dated 4/10/79 was not available at the site. The latest revision to the above drawing available at the site was Revision 3 dated 7/28/75.

CLARIFICATION:

The drawing EMDRAC 2998-488, Revision 5 is identical to revision G of the vendor's drawing for this penetration. The vendor's instruction manual was on site at the time of the NRC inspection (#50-389/81-25) and at the time of the electrical penetration installation.

The vendor's instruction manual which contained revision G of the vendor's drawing and applicable Field Change Requests, was utilized to perform the penetration installation.

VIOLATION C: FAILURE TO FOLLOW VISUAL INSPECTION

Procedure:

10 CFR 50, Appendix B, Criterion V as implemented by Section 5 of the FP&L Topical Report (FP&L-TQAR-1-76A) requires activities affecting quality be accomplished in accordance with procedures. ASME B&PV Code Section III Paragraph NC-4232.1 and FP&L Procedure QI-9.1, Revision 4, "Visual Inspection of Welds" Technique 1, paragraph 1.2.3.2 requires the offset over the width of a finished weld between materials of different thickness be faired to at least a 3 to 1 taper.

ATTACHMENT

RII:WPK
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VIOLATION C: FAILURE TO FOLLOW VISUAL INSPECTIONProcedure: (continued)

Contrary to the above, on December 16, 1981, activities affecting quality were not accomplished in accordance with procedures in that the offset across weld joint No. CS-006-FW-002 (valve to pipe weld), which had been previously inspected and accepted, was steeper than the required 3 to 1 taper.

Supplemental Response:

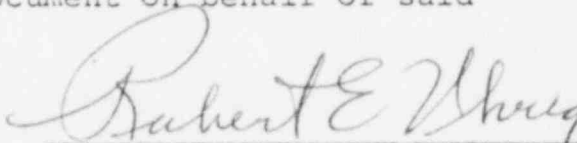
In addition to the training described in our response dated February 25, 1982, FPL will also perform reinspection of all the welds previously accepted for 3:1 taper by the QC Inspector who failed to reject CS-0006-FW-002. Also, a random check will be made of previously accepted 3:1 taper welds to determine if a more extensive, generic problem exists. To date, ten (10) 3:1 taper welds have been reinspected and found acceptable. This effort will continue until sufficient confidence is obtained to determine that the cause is isolated to a single QC inspector. This effort is scheduled for completion by May 1, 1982.

STATE OF FLORIDA)
)
COUNTY OF DADE) ss.

Robert E. Uhrig, being first duly sworn, deposes and says:

That he is Vice President of Florida Power & Light Company, the herein;


That he has executed the foregoing document; that the statements made in this said document are true and correct to the best of his knowledge, information, and belief, and that he is authorized to execute the document on behalf of said



Robert E. Uhrig

Subscribed and sworn to before me this

11 day of March, 19 82



NOTARY PUBLIC, in and for the County of Dade,
State of Florida

My commission expires:

Notary Public, State of Florida at Large
My Commission Expires October 30, 1983
Bonded and Notary Public Agency