

UNNRO REGION II
ATLANTA, GEORGIA

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February 25, 1982
L-82-63

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

Dear Mr. O'Reilly:

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

Florida Power & Light Company has reviewed the subject Inspection Report and our response is attached. There is no proprietary information contained in the report.

In addition, you expressed concern regarding management control systems at St. Lucie Unit 2 that permitted examples of a violation concerning storage and preservation of material and equipment to be identified on multiple visits. With regard to scaffolding, it was determined that most of our problems were due to the craft erecting scaffolds and not recognizing the importance of heavy weight on small pipe. This was recognized by management and it was immediately undertaken to train the craftsmen and all of their supervision up to and including the responsible supervisors. No scaffolding using support, other than patent frames, will be erected without knowledgeable supervision approving of same. This added training and layers of supervision should preclude scaffolding being erected in an unauthorized manner. In addition, I have requested Quality Assurance to perform at least weekly surveillance to regain our confidence that the above program is working.

Management also recognized that during the turnover from Construction to Startup, some confusion existed with respect to Preventive Maintenance. In order to tighten up controls and preclude confusion, it has been determined that construction will continue all preventive maintenance after turnover to Startup until the Operations Department accepts the equipment. All parties have been instructed in their duties and responsibilities clarified. In addition, all PM requirements are being

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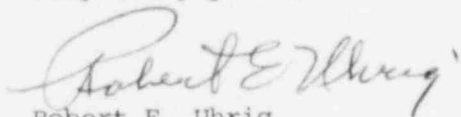
Mr. James P. O'Reilly

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reviewed by Engineering and Startup through the respective suppliers to determine the latest requirements, necessitated by the movement of equipment from one location to another; i.e., from warehouse to final location. Management also feels that the recent reorganization from Area to Discipline will preclude the same repetitious errors from occurring between Areas. Quality Assurance will continue to perform surveillance in this area to monitor the effectiveness of the changes.

Very truly yours,



Robert E. Uhrig
Vice President
Advanced Systems and Technology

REU:WBD:sm

Enclosures

cc: Harold F. Reis, Esquire

Violation A: Failure to Test Welder Qualification Test Assemblies in
Accordance with ASME Section IX

10 CFR 50, Appendix B, Criterion IX as implemented by Section 9 of the FP&L Topical Report (FP&L-TQAR-1-76A) requires measures be established to assure special processes including welding is controlled and accomplished by qualified personnel in accordance with applicable codes. ASME B&PV Code 1980 Edition, Winter 80 Addenda Section IX, Paragraph Nos. QW-463.2(d), QW-452.3 and QW-302, describes a procedure for removing weld test specimen in a sequence that will permit determination of welder qualification.

Contrary to the above, on August 18, 1981, special processes were not adequately controlled in that the licensee, by failing to mark each weld test specimen as it was removed, was unable to assure that each specimen met the ASME welder qualification.

Response:

For purposes of clarification, this violation applies to small bore piping of 1/2" diameter XX heavy wall. The coupon was cut into quarters and the entire weld was tested for two (2) face bends and two (2) root bends. Due to the small diameter area for marking, tack welding was used for identifying the position of top and bottom.

All welders are qualified to a previous welding performance qualification including GTAW and SMAW processes. The qualification in most cases is accepted by x-ray; however, when x-ray is not available, bends are made in accordance with ASME Section IX on large bore piping. Small bore performance qualification is always performed after large bore qualifications are passed; therefore, the concern of the welder not being qualified to make a quality weld does not exist.

1. FPL concurs with the finding, however, only small bore piping performance qualifications are in question since only the 1/2" diameter specimens receive bend test.
2. The reasons for the violation are: Table QA-452.1 requires one (1) face and one (1) root bend test and paragraph QW-303.3 requires four (4) bends two (2) face and two (2) root. QW-303.3 was an oversight; however, four (4) bends were made which were considered at the time to be over and beyond code requirements.
3. Corrective steps have been taken to place a poster in each weld booth where small bore welding tests are performed, stating how the coupon will be identified. A revised procedure for numbering weld coupons will be issued by March 15, 1982.

4. The Welding Supervisor will inspect each fit-up prior to Welding to verify that identification of the coupon is correct.
5. Full compliance will be achieved by March 15, 1982.

Violation B: Failure to Provide Changes of Drawings to the Location Of Fabrication

10 CFR 50, Appendix B, Criterion VI as implemented by Section 6 of the FP&L Topical Report (FP&L-TQAR-1-76A) requires measures to 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 April 10, 1979, was not available at the site. The latest revision to the above drawing available at the site was Revision 3, dated July 28, 1975.

Response:

1. Florida Power & Light does not concur with the finding, based on information obtained subsequent to the inspection. St. Lucie Unit 2 utilizes the computerized EMDRAC System (Ebasco Manufacturer's Drawing, Record and Control System) to control, record and keep track of vendor submitted drawings that pertain to the project. Ebasco Engineering Procedure E-6 covers use and operation of EMDRAC.

EMDRAC 2998-488, Rev. 5, corresponds to vendor's Revision G which is the revision in the Vendor Instruction Manual which along with PCRs was used to perform the installation. The EMDRAC comments on the drawing instructed the vendor to proceed with fabrication and required a resubmittal by the vendor. As a result, preliminary distribution was made. The incorporation of these comments by the vendor on Revision 5 of drawing 2998-488 was not required for the installation of the penetrations at the site. The Project Distribution Schedule in force at the time the revision was processed did not require that the Site be sent a reproducible of drawings that required vendor resubmittals. The Project Distribution Schedule has since been revised to include a reproducible to the job-site for all drawings released by New York for fabrication. This change was made after June 1980.

Response:

1. (continued)

Each month, a series of reports are issued which list the status of every drawing entered in the system with a unique number. The Master EMDRAC List indicates revision, date received and returned, due dates, status, etc. In addition, two (2) Delinquency Reports are generated and issued along with the Monthly Status Report. One Delinquency Report lists those drawings that are behind schedule in processing through the system and the other report indicates which vendors are behind schedule in returning drawings that require revision.

Each Ebasco Design Engineering Discipline routinely reviews the Delinquency List to follow up and close out late drawings in-house or at the vendor. In the majority of cases, the drawings returned to the vendors are acceptable as is and have been released for fabrication. A resubmittal is requested as final documentation.

- 2. Not applicable.
- 3. Not applicable.
- 4. Not applicable.
- 5. Not applicable.

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.

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.

Response:

1. FP&L concurs with the finding.
2. The weld joint No. CS-006-FW-002 was re-evaluated and found to have insufficient 3 to 1 taper lacking by 1/64" to 3/64". In addition, shrinkage of approximately 1/32" was noted at the toe of the weld.

The cause of the finding has been determined to be an oversight by the inspector due to the irregular surface of the valve body adjacent to the end prep of the valve.

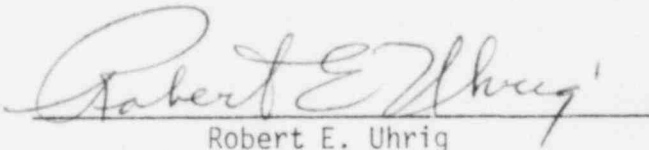
3. The above re-evaluation was documented at the time of the NRC inspection in Inspection Report M81-5791 which generated NCR 2752M. This NCR was dispositioned to initiate Weld Repair Reports for the addition of weld material to meet required 3:1 taper and eliminate 1/32" shrinkage. The repairs were performed and accepted visually, but the repair remains open pending acceptable RT.
4. Additional training was presented and documented to QC Piping and Welding Inspectors and Supervisors on the visual inspection of welds in accordance with QI 9.1 and 9.2 and in the use of fillet gauges and fillet weld size and configuration. In addition, Quality Assurance has increased surveillances in the area of welding, and added manpower to assure implementation.
5. Full compliance is scheduled for completion prior to March 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

25 day of February, 19 82

Cheryl L. Fredrick
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
Sealed thru Maynard Bonding Agency