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April 20, 1982  
L-82-160

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. 50-389/82-07

Florida Power & Light has reviewed the subject Inspection Report which identified the following violation; "Failure to Follow NDE Procedure". Mr. B. R. Crowley, the inspector, found two examples where Florida Power & Light violated 10CFR50, Appendix B, Criterion V. Attached are separate responses for each example.

Very truly yours,

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

Robert E. Uhrig  
Vice President  
Advanced Systems and Technology

REU/WBD/isc

cc: Harold F. Reis, Esquire

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Violation: Failure to Follow NDE Procedure

Example 1:

During observation of UT inspection of Steam Generator 2A weld 106-201 on February 18, 1982, the inspectors noted that the UT instrument sweep distance was set up such that the full CRT screen width represented approximately the full thickness of the material being inspected. Paragraph 5.2.1 of the applicable procedure, NDE 5.1, requires that the sweep distance be set up such that at least 1/4t beyond the nominal production material thickness be included on the CRT screen.

Response:

- 1) Florida Power & Light concurs with the finding.
- 2) The violation was a result of personnel error. The incident occurred during the first use of procedure NDE 5.1 by the particular examination team.
- 3) Immediately following the finding the following steps were taken:
  - a) The calibration was repeated with the proper sweep distance on the UT instrument.
  - b) The UT was performed in accordance with the approved procedure.
  - c) The level II examiner (exam crew leader) was placed in a probationary status. This action will increase the amount of surveillance and monitoring on the subject examiner.
- 4)
  - a) The particular exam crew and the contractor NDE supervisor will be provided with additional specific guidance and counselling on procedural compliance and NDE 5.1 in particular.
  - b) FP&L will reiterate to all NDE personnel the commitment made by FP&L, Nuclear Energy Services and the Codes and Inspections Group. The commitment stated that all nondestructive examinations will be performed in strict accordance to approved procedures.
- 5) Full compliance was achieved on February 19, 1982.

Violation: Failure to Follow NDE Procedure

Example 2:

On February 17, 1982, the inspectors observed liquid penetrant (PT) inspection of weld 05 on line RC-0116 (2" diameter stainless steel socket weld). The inspector noted that the examiner did not apply penetrant to the base material on the valve side of the weld. Paragraph 5.3.1 of QI 9.5, the applicable procedure, requires that at least the adjacent 1/2-inch area on each side of the weld be thoroughly and uniformly coated with penetrant. At the time the PT inspection was observed it was assumed to be a construction inspection. However, later investigation revealed that construction surface examination results for Class 1 welds are used to satisfy PSI inspection requirements if certain conditions are met. The determination to use construction PT inspections to satisfy PSI requirements was based on a review of the construction PT procedure (QI 9.5) to determine that the procedure met ASME Section XI, which requires PT inspection of 1/2-inch base material on each side of the weld.

Response:

- 1) FPL concurs with the finding with respect to CPL:QI 9.5 and ASME Section XI criteria.
- 2) Because of personal error the inspector failed to follow QI 9.5.
- 3) The following immediate steps were taken:
  - a) The individual involved in performance of the PT inspection on RC-116-005 was retrained, re-examined by practical test and requalified.
  - b) The PT inspection of weld joint RC-116-005 was re-performed by another inspector and was found to be acceptable.
  - c) The welding and piping Quality Control (QCS) supervisor, field supervisor (QCSP) and the NDE Level III inspector performed field evaluations of post PT examination on similar welding joints. Based on this evaluation, it was concluded that this case was an isolated one.
- 4) To avoid similar violations in the future, the following actions were taken:
  - a) All PT inspection personnel were reinstructed in the proper methods of PT inspection per QI 9.5, emphasizing the need to ensure penetrant application in accordance with Paragraph 5.3.1 of QI 9.5, Revision 4.

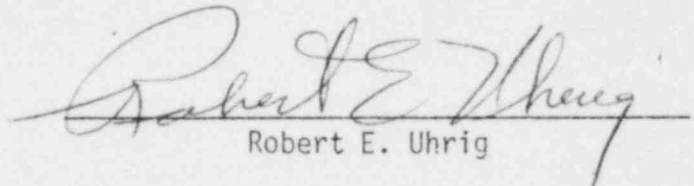
- b) QI 9.5 will be revised to include a clarification of the examination area for each type of weld. Upon issue, inspection personnel will be retrained in the new revision.
  - c) FP&L is submitting an inquiry to the ASME Section III Code Committee. The response to this inquiry will not affect the QC procedure requirements for application of penetrant 1/2-inch on both sides of the weld.
- 5) Full compliance is scheduled for completion prior to May 15, 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

20 day of April, 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                      
                    Bonded thru Maynard Bonding Agency