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CQAD 82-724

Mr. James P. O'Reilly
United States Nuclear Regulatory Commission
Region II
101 Marietta Street, Northwest
Atlanta, Georgia 30303

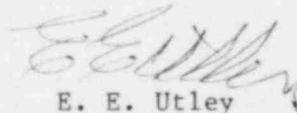
Dear Mr. O'Reilly:

In reference to your letter of March 26, 1982, referring to RII: JLC 50-400/401/82-6, the attached is Carolina Power & Light Company's reply to the deficiencies identified in Appendix A.

It is considered that the corrective and preventive actions taken will be satisfactory for resolution of the item, once completed.

Thank you for your consideration in this matter.

Yours very truly,



E. E. Utley
Executive Vice President
Power Supply and Engineering & Construction

NJC/gea (206)
Attachment

cc: Mr. J. A. Jones

Severity Level V Violation

10 CFR 50, Appendix B, Criterion V, as implemented by paragraph 1.8.5.5 of the PSAR requires that activities affecting quality be prescribed by documented instructions...and be accomplished in accordance with these instructions.

Regulatory Guide 1.143, as specified in section 1.8 of the Harris FSAR, identifies the Radioactive Waste Management System as a system important to safety and requires inspection in accordance with ANSI B31.1. Paragraphs 8.1 and 9.11 of Carolina Power and Light Company procedure NDEP-601, revision 0, identified as the applicable procedure for visual inspection of Liquid Waste System welds to ANSI B31.1, requires "all welds, prior to inspection of any hold point,...shall be free of...surface indications...such as...irregularities" and that "weld and adjacent base metal shall be free of visible arc strikes. Arc strikes which penetrate the base metal surface outside the weld area shall be ground to the bottom of the depression and liquid penetrant or magnetic particle inspected."

Contrary to the above, on February 24, 1982, activities affecting quality were not accomplished in accordance with documented procedures in that:

- (1) Buttweld Joint #'s 1-WL-641-FW-2353 and 1-WL-642-FW-2358 had insufficient weld metal deposited on the external surface of the weld prep resulting in a surface with concave external weld irregularities.
- (2) Weld joint #1-2-WL-142-FW-1318 had two arc strikes. One of the arc strikes resulted in a pit in the base metal which had not been ground or liquid penetrant inspected.

Denial or Admission and Reasons for Violation:

The inspector either overlooked or arbitrarily failed to reject these defects. Defects were located on backside of pipe and may have been difficult to see.

Corrective Steps Taken and Results Achieved:

The defects in question were reported on Nonconformance Report (NCR) W-324 for control and disposition. The Welding Inspector who inspected these pipe welds was removed from pipe weld inspection. All pipe welds inspected by this inspector are in the process of being reinspected. This includes 749 Non-Code Class, Waste Process piping field welds and 117 Code Class 1, 2 and 3 piping field welds. Approximately 26% of the reinspection has been completed. In addition to the defects identified by the NRC inspector, three other defects of a similar nature have been noted and reported on NCR-W-324. It is anticipated that the reinspection evaluation and disposition of findings will be completed by June 1, 1982.

Corrective Steps Taken to Avoid Further Noncompliance:

The inspector in question is no longer employed by the Company. We have no indications that a similar problem exists with the work of any other inspector.

Date When Full Compliance Will Be Achieved:

Full compliance will be achieved by June 1, 1982.