

USNRC REGION II  
ATLANTA, GEORGIA

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**Florida  
Power**  
CORPORATION

April 30, 1982  
QA2 039  
CS-82-110  
#3F-0482-39  
File: 3-0-3-a-2

Mr. J. P. O'Reilly, Regional Administrator  
Office of Inspection & Enforcement  
U.S. Nuclear Regulatory Commission  
101 Marietta Street N.W., Suite 3100  
Atlanta, GA 30303

Subject: Crystal River Unit 3  
Docket No. 50-302  
Operating License No. DPR-72  
IE Inspection Report 82-03

Dear Mr. O'Reilly:

We offer the following response to the violation listed in the subject inspection report.

NOTICE OF VIOLATION

The licensee could not retrieve radiographs for valve to pipe welds MUV-437 and -429 in HPI line A-2. In discussing this problem with the licensee, the inspector expressed concern over the apparent loss/misplacement of these radiographs and asked how many other safety related welds existed without the required fabrication records. Moreover, the inspector stated that as part of the corrective action, appropriate measures would have to be implemented to provide the necessary assurance that this matter was not of generic nature. The inspector stated that failure to retrieve required radiographs and/or supporting NDE documents is contrary to 10 CFR 50, Appendix B Criterion XVII as implemented by FSAR Section 1.7.6.7.1q, which requires that records shall be identifiable and retrievable. This failure to identify and retrieve required radiographs was identified as a violation, (82/82-03-01), "Failure to Retrieve Construction Radiographs."

Response: Florida Power Corporation concurs with the stated violation and offers the following response:

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On 2/18/82 radiographic film for welds MU-429 and 437 were not retrievable from Quality Files. Radiographic film for weld MU-456 was available; however, it contained a reader sheet discrepancy.

A search of the construction records turned over from the B&W Construction to FPC plant files revealed no indication that the radiographic film for MU-429 and 437 was ever transmitted to FPC. B&W field construction procedures for MU-429 and 437 indicated that an acceptable radiograph was accomplished for these welds.

During the month of February 1982, several searches of the CR-3 Quality Files by Document Control personnel were accomplished. However, no further radiographic film or records were found concerning MU-456, 437, and 429. B&W Construction Company of Copley, Ohio also performed a review of their records for the missing information. They also could not find anything additional.

All radiographic film for the portion of the MU System constructed by B&W was individually reviewed, all radiographic film folders in the CR-3 storage vault were examined for connection to MU-456, 437, and 429 welds, all microfiche records of B&W Construction records on the MU-456, 437, and 429 welds, and all PTL radiographic records were reviewed for any reference to welds MU-456, 437, and 429.

This comprehensive review revealed no additional information on MU-456 or 437. However, a radiographic film reader sheet for MU-429 was found. This indicated an acceptable radiograph had been taken of MU-429.

As of this date, the following information is available on MU-456, 437, and 429 welds:

- MU-456
  - a. Radiographic film
  - b. Radiographic film reader sheet.
  - c. Correspondence clarifying original reader sheet discrepancies.
  - d. Completed B&W field construction procedure.
- MU-437
  - a. Completed B&W field construction procedure only.
- MU-429
  - a. Radiographic film reader sheet.
  - b. Completed B&W field construction procedure.

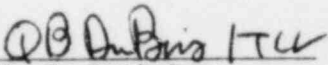
To correct the deficient construction records, the following action will be accomplished:

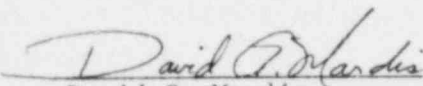
1. MU-456 - No further action required. The radiographic indications were identified as suck-up (root concavity) which is acceptable under the original construction code.
2. MU-437 - Will be reradiographed during the next CR-3 refueling.  
NOTE: A redesign of the HPI nozzle to MU System interface is being considered. If it is necessary, 437 will be cut out. Radiographs of the replacement weld will be taken and placed in the Quality Files.
3. MU-429 weld area is not being considered for redesign at this time, and will be reradiographed during the next CR-3 refueling.

All plant records are presently being re-indexed and placed on a computerized retrieval system. This will help to alleviate a majority of the record retrieval problems experienced in the past.

Should there be further questions, please contact us.

Very truly yours,

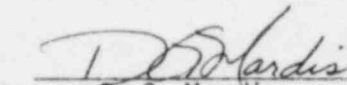
  
T. C. Lutkehaus  
Nuclear Plant Manager

  
David G. Mardis  
Acting Manager  
Nuclear Licensing

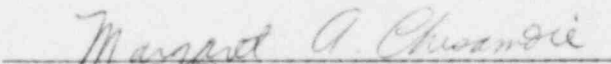
JLB/rc

STATE OF FLORIDA  
COUNTY OF PINELLAS

D. G. Mardis states that he is the Acting Manager, Nuclear Licensing, of Florida Power Corporation; that he is authorized on the part of said company to sign and file with the Nuclear Regulatory Commission the information attached hereto; and that all such statements made and matters set forth therein are true and correct to the best of his knowledge, information, and belief.

  
D. G. Mardis

Subscribed and sworn to before me, a Notary Public in and for the State and County above named, this 30th day of April, 1982.

  
Notary Public

Notary Public, State of Florida at Large,  
My Commission Expires: May 29, 1984

MAKEUP/HIGH PRESSURE  
INJECTION LINE  
CRACKING AND  
WELD FAILURE

CRYSTAL RIVER 3

DOCKET NO. 50-302

Prepared by:  
N. Economos, Metallurgical Engineer

Approved by:

*AR Herdt*

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A. R. Herdt, Acting Chief  
Engineering Inspection Branch  
Division of Engineering and  
Technical Programs