P.O. BOX 529100 MIAMI, FL 33152

FPL
FLORIDA POWER & LIGHT COMPANY

May 28, 1982
L-82-232

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

Re: RII:WPK
St. Lucie Unit 2
Docket No. 50-389/82-13

Dear Mr. O'Reilly:

Florida Power & Light Company has reviewed the subject Inspection Report which identified the following violations; "Use of Incorrect Calibration Block for PSI UT of Weld 123-2." Please find attached our response to this violation.

Very truly yours,

J a de Mastry

Robert E. Uhrig
Vice President
Advanced Systems and Technology

REU/PPC/isc

cc: Harold F. Reis, Esquire

RII:WPK
50-389/82-13

Violation: "Use of Incorrect Calibration Block for PSI UT Weld 123-2"

10 CFR 50.55.a(g), as implemented by paragraph 5.2.4 of the FSAR, requires in part that, ASME Code Class 1 components meet preservice (PSI) examination requirements of Section XI of the ASME Boiler and Pressure Vessel Code (B&PV). Article 4 of ASME B&PV, Section V, referenced in Section XI, has been identified by the licensee as the applicable Code for PSI ultrasonic inspection (UT) of reactor coolant pressure boundary piping. Table T-434.1 and paragraph T-434.3 of ASME B&PV, Section V require that the thickness of the UT calibration block be within one inch of the thickness of the weld.

Contrary to the above, on April 27, 1981, preservice inspection was not being performed in accordance with ASME B&PV, Section XI in that the thickness of the UT calibration block used for the 45° angle beam calibration for reactor coolant pressure boundary weld 123-2, zone 7, was not within one inch of the thickness of the weld.

This is a Severity Level V Violation (Supplement II.E)

Response:

1) FP&L concurs with the finding.

2) The reason for the violation is examination personnel error. At that time (April 1981) it was customary for NDE examiners to calibrate the ultrasonic equipment and then perform examinations as they became accessible, regardless of zoned location. In the cited instance, the examiner was calibrated for "cold leg" primary coolant piping and had performed examinations on five different welds. The examined welds were located in three different zones with weld 123-2 being zone 7, which is a "hot leg". Although it was correct to switch zones during the examination, it was not correct to apply the "cold leg" calibration to the thicker piping of the hot leg zones.

3) Since June of 1981 it has been recognized by FP&L that such problems can occur when examination teams are allowed to float from zone to zone. Thus, it has been our policy to assign examination crews to a particular zone with emphasis on calibration block applicability. Further, the present procedures, examiner orientation and the examinations which follow-up these sessions provide safeguards for the identification of calibration block selection problems.

4) Weld 123-2 is presently scheduled to be re-examined using the proper calibration block. As stated above, examiner orientation provides a reminder to NDE examiners that they should be aware of ultrasonic response differences between calibrations and examinations. Examination data for the balance of plant data is carefully reviewed for such errors. Primary coolant piping data will be re-reviewed to insure that such problems do not exist.

5) Full compliance will be achieved by June 15, 1982.