

Washington Public Power Supply System

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July 2, 1982
G01-82-0412

Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 210
Walnut Creek, California 94596

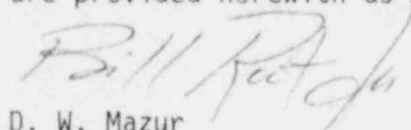
Attention: R. H. Faulkenberry

Subject: NUCLEAR PROJECT 1
NRC INSPECTION WNP-1
DATES OF INSPECTION
FEBRUARY 22-26, 1982 AND MARCH 2-12, 1982
DOCKET NO. 50-460
CONSTRUCTION PERMIT NO. CPPR-134

Reference: Letter RH Faulkenberry to DW Mazur
NRC Inspection at WNP-1 Site
dated May 17, 1982

The above reference letter delineated the results of the February 22-26, 1982 and March 2-12, 1982 inspections of activities authorized by NRC Construction Permit No. CPPR-134. Further, the referenced letter identified certain activities which were not conducted in full compliance with NRC requirements set forth in the Notice of Violation enclosed as Appendix A. These items of noncompliance have been categorized into a level as described in Supplement II of the Federal Register dated of October 7, 1980 (45FR66754) as the Interim Enforcement Policy.

The specific findings, as identified, and the Supply System responses are provided herewith as Appendix A.


D. W. Mazur
Acting Program Director

DWM:JMS:lm

cc: CR Bryant, BPA (399)
JP Laspa, Bechtel (860)
V. Mani, UE&C (897)
V. Stello, Director of Inspection, NRC
A. Toth, NRC
FDCC (899)

NUCLEAR REGULATORY COMMISSION
REGION V
1450 MARIA LANE, SUITE 210
WALNUT CREEK, CALIFORNIA 94596
DOCKET NO. 50-460 AND 50-513
CONSTRUCTION PERMIT NO. CPPR-134 AND -174

APPENDIX A

- A. 10 CFR 50 Appendix B Criterion V and Section 17.1.5 of the PSAR state in part: "...activities affecting quality shall be prescribed by documented instructions, procedures, or drawings...and shall be accomplished in accordance with these instructions, procedures or drawings...."

University Nuclear Systems Incorporated (UNSI) procedure QCP/CP 27.0, Revision 9, dated May 11, 1981, "Duct, Hangers, and Accessories Installation Inspection: paragraph 6.1 states in part: "The installation foreman is responsible to enter all appropriate data on the IPI as work is performed." IPIs are defined in the procedure as "In-Process Inspection Records."

QCP/CP No. 22, Revision 6, dated 7/8/81 "General Welding Standards" paragraph 7.1 states in part: "The identity of all welders...who have worked on specific joints...shall be recorded for all Quality Class I weld joints...."

Contrary to the above, an installation foreman erroneously listed welder number 3544 as the welder identity for twenty-five duct branch take off modifications on IPIs Nos. 5544, 5546, 5554 and 5557 on January 18 and 19, 1982. Welder 3544 had used only 26 welding electrodes as documented on Welding Filler Metal Withdrawal Slip Nos. 1476 and 1483 whereas a minimum of 75 welding electrodes would be required to perform the duct modifications credited to the welder.

This is a Severity Level V Violation applicable to Unit 1.

A. SUPPLY SYSTEM RESPONSE

Corrective Action

An MCAR was issued January 15, 1982 to address the problem of craft preparation of quality documentation. The response to the MCAR required a review and rewrite of procedures as necessary to reduce/eliminate craft preparation of quality documentation.

UNSI procedure QCP/CP 27.0 required the foreman to initiate and identify on the IPI the welder and weld procedure for each "description". These procedural requirements exceed the requirements of Contract 9779-216 and the AWS D1.1-77 Code for this type of work.

Procedures are in place which insure that only qualified and certified welders obtain filler metal for procedures to which they are qualified. All Quality Class I and G-Seismic Weld Joints are QC inspected and accepted.

UNSI procedures are in the process of being reviewed and rewritten if necessary eliminating, where possible, craft from completing quality documentation. UNSI QCP/CP 27.0, Rev. 12 has been rewritten and was implemented on April 5, 1982. In the process of implementing of QCP/CP 27.0, Rev. 12, previous inspection documents are being reviewed to assure that all completely installed items have been or will be inspected and accepted by QC. Anticipated completion date is June 30, 1983.

This will resolve any documentation deficiencies which exist, resulting from craft input on inspection documentation.

All applicable UNSI procedures will be reviewed and revised as necessary by June 30, 1983.

- B. 10 CFR 50 Appendix B Criterion XVI and Section 17.1.16 of the PSAR state in part: "Measures shall be established to assure that conditions adverse to quality, ...are promptly identified and corrected...The identification of the signification condition adverse to quality, the cause of the condition, and the corrective action taken shall be documented...."

UNSI Procedure QCP/CP 5.1 Revision 6 dated June 17, 1981 "Quality Assurance Records" paragraph 5.6 states in part: "If supplemental, new, or corrective information needs to be added to a QA record...a Records Clarification Form...shall be used. In utilizing the Records Clarification...a written justification for each change shall be prepared...."

Contrary to the above, corrective action was not documented for "Welding Filler Metal Withdrawal Slip" forms used by a welder (identification number 3680) on December 13, 1981 and a welder (identification number 4537) on August 21, 1981. The Metal Withdrawal Slip forms show low hydrogen E7018 welding electrodes were not returned within a four hour usage time limit specified by AWS D.1.1. Documentation was not available to substantiate that corrective action had been taken nor that an evaluation of welds made with the electrodes had been performed.

This is a Severity Level V Violation applicable to Unit 1.

B. SUPPLY SYSTEM RESPONSE

Corrective Action

A review of all UNSI rod withdrawal slips issued from August 1, 1981 thru December 31, 1981 has been performed. For any E7018 weld rod out of the rod room longer than four (4) hours, a Contractor Nonconformance Report shall be issued by July 16, 1982 to the Engineer for dispositioning.

UNSI Quality Assurance issued a CAR, No. 82-8 requiring full compliance to QCP/CP 7.0, Rev. 19, "Weld Filler Metal Control", Para 5.3.2.1 requirements. UNSI Project Manager has responded stating, "Failure to comply with Weld Rod Control Measures will result in termination of welders and/or weld rod room attendants as necessary." This will preclude recurrence.

QCP/CP 5.1 Para. 5.6.2 requires a Records Clarification Form only if there is insufficient room on the record or the record is remote from the person supplying the information. In the case of the change made to the rod withdrawal slip no Records Clarification Form was required.

- C. 10 CFR 50 Appendix B Criterion V and Section 17.1.5 of the PSAR state in part: "...activities affecting quality shall be prescribed by documented instructions, procedures or drawings...and shall be accomplished in accordance with these instructions, procedures or drawings..."

UNSI procedure QCP/CP No. 22.0 Revision 7 dated November 2, 1981 "General Welding Standards" paragraph 1 states in part: "This General Welding Standard is to be used in conjunction with the applicable Welding Procedure Specification...to govern all welding operations." The Welding Procedure Specification form Attachment (1) to QCP/CP No. 22.0 requires the applicable weld joint type and base metal thickness range be entered on the form. The UNSI Welding Procedure Specifications issued for use specify the applicable weld joint type and applicable base metal thickness range.

Contrary to the above, UNSI memorandum number 23670 dated January 27, 1982 was issued to all field supervision and stated in part: "WPS Material Thickness Limitations apply to groove welds only. Fillet welds may be made using any WPS...WITHOUT REGARD TO MATERIAL THICKNESS."

The general superintendent who issued the memorandum stated the reason the memorandum was issued was because the WPS specified current ranges for the WPS specified material thicknesses were not sufficient for some fillet welds.

This is a Severity Level V violation, Supplement II, applicable to Unit 1. This is a repeat item of noncompliance.

C. SUPPLY SYSTEM RESPONSE

Corrective Action

UNSI memo 23670, dated January 27, 1982 did not modify the welding procedure specifications (WPS) but did interpret (clarify) the applicability of the WPS to fillet welds.

All of the welding procedure specifications did include fillet welds in the applicable joint designs specified. The UNSI memo 23670 clarified the base metal thickness for groove welds versus fillet welds as refined in the AWS D1.1 or ASME IX codes as applicable.

The UNSI Welding Procedure Specifications are being reviewed and rewritten, as required to more clearly define inspection criteria, thereby reducing the need for clarifying memos. Date of full compliance will be achieved by July 16, 1982.

- D. 10 CFR 50 Appendix B Criterion V and Section 17.1.5 of the PSR state in part: "...activities affecting quality shall be prescribed by documented instructions, procedures or drawings...and shall assure that each item is...the...configuration specified by the...applicable drawing."

UNSI drawing DH-4586 Sheet 1 Revision 54 "HVAC Ductwork-Support and Partial Plan Elevation 479'-0", Section C-C, requires $1\frac{1}{2}$ " x $1\frac{1}{2}$ " x $\frac{1}{4}$ " reinforcing angle iron be attached to existing ductwork reinforcing steel or duct support hangers by $\frac{1}{4}$ " fillet welds $1\frac{1}{4}$ " fillet welds $1\frac{1}{4}$ " long.

Contrary to the above, eight assemblies were installed with butt welds rather than fillet welds and were inspected and accepted by two different UNSI QC inspectors on January 19 and 21, 1982. The assemblies were listed and signed off on In Process Inspection Record (IPI) 5546.

This is a Severity Level V Violation, Supplement II, applicable to Unit.

D. SUPPLY SYSTEM RESPONSE

Corrective Action

Reinspection of PCP 14Q03998, Rev. D requirements is being performed on a random basis by different QC inspectors of work accepted by the subject QC inspectors. Any items found to be non-conforming will be documented on contractor nonconforming reports and submitted to the engineer for disposition by July 16, 1982.

Action to Preclude Recurrence

The subject QC inspectors were retrained in the requirements of working to the latest approved procedures, instructions, and drawings. Additionally, all UNSI QC inspection personnel were retrained in the requirements of working to the latest procedures, instructions and drawings.

UNSI Inspectors are qualified and certified inspection personnel based upon experience, education and proficiency examinations. The latest approved procedures, instructions and drawings are available to the inspector in the work area.

PCP 14Q03998 Rev. D has been revised to permit groove (butt) welds or fillet welds dependent upon configuration.

STATE OF WASHINGTON)
COUNTY OF BENTON)

R. W. Root, being first duly sworn, deposes and says: That he is the Assistant Program Director-Construction and has been delegated the full responsibility and authority to act for the Program Director, WNP-1/4, for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that he is authorized to submit the foregoing on behalf of said applicant; that he has read the foregoing and knows the contents thereof; and believes the same to be true to the best of his knowledge.

DATED July 1, 1982

R. W. Root
R. W. ROOT

On this day personally appeared before me R. W. ROOT to me know to be the individual who executed the foregoing instrument and acknowledged that he signed the same as his free act and deed for the uses and purposes therein mentioned.

GIVEN under my hand and seal this 1st day of July, 1982

Lynnda R. Powell
Notary Public in and for the State
of Washington
Residing at Wilkesland