

REGION II
ATLANTA, GEORGIA



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November 8, 1982
L-82-489

Mr. James P. O'Reilly
Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, Suite 300
Atlanta, Georgia 30303

Re: RII:BRC
St. Lucie Unit 2
Docket No. 50-389/82-43

Dear Mr. O'Reilly:

Florida Power and Light Company has reviewed the subject inspection report which identified three violations.

Please find attached our responses to these violations. Also attached (Addendum to Violation B), is our response to a finding resulting from Inspection 82-45.

This letter is being submitted on the above date as discussed with your Mr. Caudel Julian.

Very truly yours,

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

Robert E. Uhrig
Vice President
Advanced Systems and Technology

PPC/cab

cc: Harold F. Reis, Esquire

Attachments

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ATTACHMENT

VIOLATION A

10 CFR 50, Appendix B, Criterion V, as implemented by Section 5 of the FP&L Topical Report FP&L-TQAR-1-76A, requires in part that, activities affecting quality shall be prescribed by documented instructions, procedures, and drawings and shall be accomplished in accordance with these instructions, procedures and drawings. Paragraph 6.1 of Site Procedure SQP-64, "Turnover and Inspection Status," requires in part that, all construction verification, testing, and quality inspections be completed prior to initiation of a turnover package or noted as a punch list item. Procedure QI 10.13, "Inspection of Mechanical Equipment Installation," and Appendix "B" of Procedure SQP-64 require installation inspection of the Component Cooling Water Surge Tank prior to turnover to "Startup."

Contrary to the above, on September 8, 1982, activities affecting quality had not been accomplished in accordance with documented procedures in that the Component Cooling Water Surge Tank had been turned over to "Startup" without being bolted to it's foundation and without receiving an installation inspection.

FP&L RESPONSE

- 1) FP&L agrees with the finding.
- 2) Site Quality Procedures (QI 10.13) require QC inspection only when a construction process sheet is determined to be necessary by the Senior Resident Engineer to control the installation. The Component Cooling Surge Tank was not identified as requiring Construction Process Sheets and was therefore, not inspected by QC.

NCR 1627M was issued to document and correct problems encountered with anchoring the CCWST. NCR 1627M would have been noted as a punchlist item against this piece of equipment at the time of turnover, however, this NCR was inadvertently closed out in error. The documentation search thus found no open items against the tank. Because NCR 1627M included a Construction Process Sheet, an inspection was performed and this inspection report is the one referred to in the turnover package as required and completed. The issue of NCR 1627M closure is addressed in the response to Violation C.

- 3) NCR's 4528ME and 4529ME were issued to document problems with the Component Cooling Water Surge Tank. These NCR's have been added to the exception list in the turnover package for the system in accordance with the requirements of SQP-64.
- 4) To prevent recurrence of this deficiency, FP&L proposes:
 - 1) Review a sampling of similar tanks which were installed without Construction Process Sheets.
 - 2) As part of the above, review the turnover packages for correct documentation.
- 5) Full compliance will be achieved by November 15, 1982.

VIOLATION B

10 CFR 50, Appendix B, Criterion IX, as implemented by Section 9 of FP&L Topical Report FP&L-TQAR-I-76A, requires that measures be established to assure that special processes including welding and nondestructive testing are controlled. Technique 5 of procedure QI 9.1, "Visual Inspection of Welds," requires a final visual inspection of all non-uniquely identified welds. Procedure SQP-39, "Field Welding Control," requires that a non-unique weld traveler be initiated for non-uniquely identified welds.

Contrary to the above, on September 8, 1982, measures were inadequate to control welding and nondestructive testing of non-uniquely identified structural welds in that:

1. The control system does not have provisions for identifying when a weld or group of welds are ready for inspection, or whether a weld or group of welds have been inspected.
2. The Component Cooling Water Surge Tank Support to embed welds had been completed and painted without the final visual inspection.
3. The Component Cooling Water Surge Tank Support to embed welds had been made without a weld traveler.

FP&L RESPONSE

- 1) The three items listed in the violation are addressed separately below.

Item 1:

Due to the fact that FP&L had not yet implemented the planned turnover program for civil structures and related items, FP&L concurs with the violation.

The non-unique weld traveler system was conceived to allow non-uniquely identified welds to be performed using approved materials and techniques. The traveler identifies a group of welds by referencing the controlled drawing or drawings on which they appear.

The system for control of non-unique welds is as follows. Per Site Quality Procedure (SQP) 39, the activity requesting the work (e.g. discipline superintendent or designee) initiates form 4350 - 1.14, "Non-Unique Weld Traveler" requesting welding data and submits it to the Welding Superintendent. The Welding Superintendent completes the form, returns it to the requesting activity, and forwards a copy to site quality control.

The requesting activity gives the approved traveler to a welding supervisor and the work is assigned to qualified welders. As the welding is accomplished (for example, all welds for one drawing or a portion of a drawing listed on the traveler), QC is notified and inspects the work per Quality Instruction (QI) 9.1.

QC is notified by any of various means. A copy of the traveler is sent to QC stating which portion of the work is accomplished, or a QC supervisor will receive a call from a field supervisor stating that some portion of the work is finished, or a QC inspector for a given physical area will see that the work is accomplished and will inform his supervisor, who will then have him perform an inspection. The inspections are performed over a period of time because the work authorized by the traveler may consist of many items accomplished over a long period of time, i.e. as the construction schedule dictates.

Inspections for all seismic Category I non-unique welds are transmitted to the QC vault with a copy of the traveler, per SQP 39.

This system controls the withdrawal of weld rod material for accomplishment of the welding and technique for welding.

It has been the intent of FP&L to turnover civil structures, including a status of inspections per SQP-64. At the time of the subject inspection, this program had not been scoped and fully defined. Corrective action is discussed in Section 3.

Item 2:

Based on the response to Item 1, FP&L concurs with this finding. Items not yet inspected will be scoped and dispositioned as per the planned civil structure turnover program.

Item 3:

At the time of the subject inspection, the non-unique weld traveler authorizing the work on the Component Cooling Water Surge Tank support-to-embed welds could not be located. Upon further investigation following the inspection, non-unique weld traveler CO-762, issued February 13, 1981, was identified as the traveler for these welds. Based on the availability of this additional information, FP&L feels that this finding is no longer valid.

- 2) The subject welds were inspected on September 30, 1982 and documented on inspection report number C82-3391, and deficiencies noted were documented on Non-Conformance Report number 4864, dated October 7, 1982.

The scope of the civil turnover program is currently underway and will be complete by October 29, 1982.

- 3) To ensure that adequate control is maintained over non-uniquely identified structural welding, FP&L proposes the following corrective action.
 - 1) All civil structures will be turned over, using a formal turnover system, as defined in Site Quality Procedure 64.
 - 2) As part of the civil turnover, records will be verified to ensure that all required inspections have been performed and properly documented.
 - 3) Civil structures will be walked down to latest revision drawings and discrepancies will be documented and dispositioned.
 - 4) All civil turnover packages, including inspection status, will be completed by Core Load.

ADDENDUM TO VIOLATION B

Subsequent to the above Violation, a similar item was noted by your Mr. R. Wright during his inspection 50-389/82-45 the week of October 4, 1982. While inspecting FCR-2-3130U or the installation of the push button station for valve V-3656, he noted that the welds were not of the length required by the FCR and that no non-unique weld traveler had been issued for the required welding.

The subject push button station is one of a number of stations and conduit supports for which a non-unique weld traveler was issued on April 11, 1979. FCR-2-3130U changed the location of the subject push button station but did not change the weld material or welding procedure for installation of the station. The above traveler was used to draw materials for the required welding and the referenced welding procedure, W.P.S.-11, was used to perform the work.

In regard to the work not being performed as described in the FCR, FP&L agrees and attributes it to personnel error. Subsequent to the inspection, non-conformance report 4890E was issued documenting the deficiency.

A deficiency of this nature would normally be documented when the item is inspected, which in this case had not yet been accomplished. As stated in the response to Violation B above, as part of the civil turnover, the status of required inspections will be verified and deficiencies documented and properly dispositioned.

VIOLATION C

10 CFR 50, Appendix B, Criterion V, as implemented by Section 5 of the FP&L Topical Report FP&L-TQAR-1-76A, requires in part that activities affecting quality shall be prescribed by documented instructions, procedures, and drawings and shall be accomplished in accordance with these instructions, procedures and drawings. Paragraph 4.4. of procedure QI 15.1, "Identification and Control of Discrepant Conditions," and paragraph 8.3.3 of procedure SQP-21, "Corrective Action," require that corrective action specified in nonconformance reports (NCR's) be performed and that NCR's be closed out after completing all corrective action. NCR 1627M for the Component Cooling Water Surge Tank support required that a traveler be issued for welding required by the NCR.

Contrary to the above, on September 8, 1982, NCR 1627M had been closed out and the NCR corrective action had not been completed. In addition, part of the welding required by the NCR had been completed and a weld traveler had not been issued.

FP&L RESPONSE

- 1) FP&L agrees with the finding.
- 2) NCR 1627M was closed out in error due to misinterpretation of the disposition of the NCR by the inspector. The inspector incorrectly assumed that the weld on the east leg had already been inspected and that the bolts on the west leg were to be either installed or the bolt holes plug welded. He found the bolts installed and mistakenly closed the NCR based on this observation.

At the same point in time, subsequent to his inspection, the nuts were apparently removed.

- 3) An NCR (4528ME) was issued to document the above condition and has been dispositioned by Engineering to bolt the west leg to the platform. The uninspected weld on the east end will be gouged out, rewelded and reinspected in accordance with a new weld traveler.
- 4) Inspection and Supervisory personnel have been instructed in the necessity for ensuring that the disposition of a discrepancy report is completely understood prior to performing inspections to verify its implementation.
- 5) Corrective Action will be complete by November 15, 1982.