



USNRC REGION II  
ATLANTA, GEORGIA

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**Florida  
Power**  
CORPORATION

April 8, 1983  
3F-0483-06

Mr. J. P. O'Reilly  
Regional Administrator, Region II  
U. S. Nuclear Regulatory Commission  
Office of Inspection & Enforcement  
101 Marietta Street, Suite 2900  
Atlanta, GA 30303

SUBJECT: Crystal River Unit 3  
Docket No. 50-302  
Operating License No. DPR-72  
IE Inspection Report No. 82-32, Supplemental Response

Dear Mr. O'Reilly:

Inspection Report 82-32 cited two examples of welding beyond the limits of the welder's qualifications. The first example concerned a welder being requalified for a larger thickness in all directions by testing his welding for the larger thickness in only one direction. This example was addressed in the initial response to the violation on February 10, 1983.

The second example of this violation concerned a welder being requalified without adequate documentation indicating the thickness of the weld deposited, making it impossible to determine the thickness range of his qualification. This example was overlooked in the initial response due to the format of the inspection report. The second example of the violation was addressed in paragraph 3.a. of the subject report. This example of Violation 82-32-01 is addressed herein.

Sincerely,

G. R. Westafer  
Manager  
Nuclear Licensing and Fuel Managment

PGH/caw

Enclosure

cc: Document Control Desk  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

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**FLORIDA POWER CORPORATION RESPONSE**  
**INSPECTION REPORT 82-32**  
**April 8, 1983**

**VIOLATION**

Title 10, Code of Federal Regulations, Part 50.55a, paragraph (a) (1), requires structures and components be fabricated and inspected to quality standards commensurate with the importance of the safety function. ASME Boiler and Pressure Vessel Code Section IX 1980 edition, paragraph QW-301 delineates the requirements for welding performance qualification tests of welders.

Contrary to these requirements, on December 15, 1982, welder performance qualifications were not in accordance with QW-301 requirements in that a welder was permitted to fabricate production weld(s) beyond the limits of his qualification.

This is a Severity Level V Violation.

**RESPONSE**

- (1) FLORIDA POWER CORPORATION'S POSITION: As stated in the subject report, a contracted welder did exceed the limits of his documented qualification during the fabrication of certain production welds contrary to the requirements of ASME IX (1980) paragraph QW-301. Failure to meet Section IX requirements constitutes a violation of 10CFR50.55a(a)(1).
- (2) DESIGNATION OF APPARENT CAUSE: This violation was caused by a less conservative interpretation of the ASME requirements.

Prior to the subject inspection, the welder qualifications process required that a welder deposit a specific amount of weld material in a specific area. Thus, although the actual thickness of the material deposited was not measured or documented, the weld thickness was indirectly known and was considered sufficiently similar to previous tests to warrant acceptance. As pointed out by your staff, this thickness approximation method does not meet the intent of ASME Section IX.

- (3) IMMEDIATE CORRECTIVE ACTIONS: Welder qualification records have been reviewed and revised to show the individual thickness range of each welder.

To prevent a recurrence of this violation, Florida Power Corporation and its contractors will directly measure and document each individual welder's deposit during future qualifications.

- (4) LONG TERM CORRECTIVE ACTIONS: Florida Power Corporation is developing a Welder Qualification Status Tracking Program. This program will allow ready access to a documented Florida Power Corporation interpretation of code requirements. The interpretation will be based on ASME Code and should eliminate conflicting code interpretations.
- (5) DATE OF FULL COMPLIANCE: On February 1, 1983, Florida Power Corporation was in full compliance.