P. O. BOX 14000, JUNO BEACH, FL 33408

FLORIDA POWER & LIGHT COMPANY

March 18, 1983
L-83-156

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

Dear Mr. O'Reilly:

RE: St. Lucie Unit 2
Docket No. 50-389, 10CFR50.55(e), 82-019
BENT SMALL BORE PIPING NOT INSPECTED

On October 13, 1982, Florida Power and Light notified the NRC of a potential 10CFR50.55(e) condition existing at St. Lucie Unit No. 2 Site involving inspection of approximately 240 small bore piping bends. Attached please find our final resolution of this issue.

Very truly yours,

Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/SAV/cab

I SUMMARY

While preparing N-5 Code Data Reports, it was discovered that bent small bore piping, Class 1, 2 and 3, had not been inspected for minimum wall thickness and quality. An evaluation was performed and corrective action has been implemented.

Per the requirements of 10CFR50.55(e) and 10CFR21, this concern has been evaluated and deemed non-reportable.

II DESCRIPTION

Section III ASME Code paragraph NX4223.1 requires selection and qualification of bending process to assure maintenance of wall thickness after bending to satisfy the requirements of the stress report at the resultant section thickness. In lieu of qualification of the bending process, NX4223 allows the use of table Nx3642.1(b). Ebasco's specification FLO-2998-09913 which is referenced in site quality procedure SQP-47, Rev. 7, addresses the requirements of this table. No Quality Control Procedure (QI) was written to assure that the requirements of NX4223.1 were being met.

III CORRECTIVE ACTION

A non-conformance Report (NCR 4511M), documenting the deficient condition and effected piping was issued. Quality Control Procedure (QI) 9.1, Rev. 5, Technique 8 was issued to implement SQP-47 and establish inspection criteria and methodology. Quality Control inspectors received training in the above QI: then inspected the bent piping and the as-found conditions were evaluated by Ebasco Services, Inc.

IV SAFETY IMPLICATIONS

The ASME Code requires that the pipe ovality not exceed 8% and that the minimum wall thickness be greater than required to perform its function. Our evaluation revealed that in all cases, the absolute minimum wall, calculated by Ebasco Engineering has been met. However, the limit of 8% ovality has been exceeded in five(5) instances. Therefore, calculations were undertaken to assure that any undue stresses have not been introduced to the piping, as a result of exceeding the ovality requirements. Upon completion of these calculations, it was verified that the stresses are within acceptable limits of ASME Code, Section III and if left uncorrected would not have created a safety hazard.

V CONCLUSION

While there was a breakdown in the QC program, the conditions, if left uncorrected, did not pose a significant safety hazard based on the above mentioned evaluation. Therefore, we deem this item not reportable under 10CFR50.55(e) or 10CFR21. All corrective actions have been completed and relevant documentation is available at the St. Lucie Unit 2 Site. This report closes this item for reportability requirements.