

Washington Public Power Supply System

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Docket No. 50-397

March 18, 1983
G02-83-241

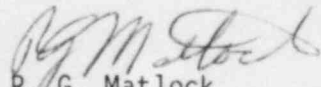
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Subject: NUCLEAR PROJECT NO. 2
NRC INSPECTION 50-397/83-03 - NOTICE OF DEVIATION

Reference: Letter R.T. Dodds to R.G. Matlock, dated February 18, 1983

Washington Public Power Supply System hereby replies to the Notice of Deviation transmitted as Appendix A via the referenced letter. Our reply consists of this letter and Attachment 1 which contains our response to the Notice of Deviation.

If you have any questions or desire further information, please contact Roger Johnson at (509) 377-2501, extension 2712.


R.G. Matlock
Program Director, WNP-2

RTJ/kd

Attachment: Response to Notice of Deviation

cc: W.S. Chin, BPA - Site
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Attachment 1

WASHINGTON PUBLIC POWER SUPPLY SYSTEM
NUCLEAR PROJECT NO. 2
DOCKET NO. 50-397
LICENSE NO. CPPR-93

NOTICE OF DEVIATION

Statement of Deviation

As a result of the inspection conducted on January 1-31, 1983, and in accordance with the NRC Enforcement Policy, 10CFR Part 2 Appendix C, 47 FR 9887 (March 3, 1982), the following deviation was identified:

Section 2.6 of the Supply System's July 17, 1980 response to the Commission's 10CFR50.54(f) request for information dated June 17, 1980, requires documentation and analysis of deficiencies identified during the performance of record reviews of contractor's work.

Contrary to the above, Supply System restart task force RCSW management failed to act on a record discrepancy for valve SW-V-71B that was identified by a task force member in a memorandum dated October 29, 1980. The record discrepancy related to repair work by unidentified personnel, unfounded correction of the nondestructive examination report, and acceptance of the repaired area without the required control documentation.

This is a deviation.

Supply System Response

Corrective Steps Taken and Results Achieved

Following identification of the issue, the following steps were taken with results as noted.

1. An acid etch was performed January 26, 1983 to determine if weld metal had been deposited on valve SW-V-71B. It was determined that weld metal had been applied in an area $2\frac{1}{2}$ inches long by $7/16$ inches in width, approximately $5/8$ inch from the weld.
2. NCR 020682 was generated on January 26, 1983 to document the weld condition and to initiate an investigation into why the weld repair was not documented. The apparent cause is as follows. The original weld 5 installing valve SW-V-71B was completed on November 17, 1978 by one welder. The required NDE was performed December 5, 1978 and NDE Report 4983 generated which identified pits in the valve body within $\frac{1}{2}$ inch of the completed weld. Another welder was called in to grind out the area and reweld using the same procedure and weld rod. This was completed on December 5, 1978 and documented on the weld record form. Final NDE was also performed and accepted on December 5, 1978 as documented on the weld record form. The apparent rationale was that since the repaired area was approximately $\frac{1}{2}$ inch from the completed weld, the area in question was within the Heat Affected Zone, therefore, did not require a separate repair process.

Based on this rationale, the welded area has been accepted by the Architect Engineer.

3. On July 18, 1979, approximately seven months after completion of the weld, Contract 215 documented an Inspection Report (IR) 3674 which indicated that no Base Metal Repair Record had been generated for the rewelded area. On July 19, 1979, this IR was voided stating that welding was not performed and that the NDE Report No. 4983 had been revised to reflect this. The QC Inspector who completed the NDE Report changed the report to read, "No reweld, just blended," signed and dated the entry July 19, 1979. This notation by the Inspector is in error and a review of the weld records would have clarified the discrepancy.
4. As stated in the Item of Deviation on October 19, 1980, a Restart Task Force Team member authored a memo (RCSW-80-172) identifying the fact that no Owner authorization was obtained for either blending or rewelding on valve SW-V-71B and raising the issue of apparent document alteration by the QC Inspector. The RCSW Team Supervisor replied via speed memo raising several questions regarding the memo and requiring additional information. The task member was requested to reply, but no evidence can be located that a reply was made and the memo was voided.

Although the reason why the memo was voided cannot be definitely determined at this time, it is known the Restart Task Force had been conducting a review of Inspection Reports during 1980. The results of this review are documented in RCSW-80-073, dated September 18, 1980, and include a discussion of IR 3674, among others. These results were sent to the Task Force Manager with recommendations for revising the 215 Contractor's Program for processing, dispositioning, reviewing and closing IR's. Since this memo predated RCSW-80-172 by approximately one month and covered the complete topic of IR program deficiencies, including the one specific IR documented in the task member's memo, the need for the task member's memo was indeed questionable.

5. On April 20, 1981, the task team responsible for reviewing the adequacy of the 215 Contractor's actions preparatory to restarting construction activities authored memo RCSW-81-559 documenting the results of their review of improvements made to the control of IR's by the 215 Contractor. This memo noted that based on previous team reviews, the 215 Contractor's IR Program had been shown to be inadequate because of:

- o Inadequate and unsatisfactory dispositions of IR's
- o Excessive procedures describing the process
- o Inadequate controls over voiding IR's
- o Inadequate training of personnel

The memo also noted that the Contractor had issued a Corrective Action Report (#190) which included

- o Development of one procedure (QAP-360) for control of IR's
- o Training of Personnel
- o A complete review of all closed IR's
- o A tracking system for IR's

The memo concluded that the issues identified in RCSW-80-273 and RCSW-80-073 had been or would be adequately addressed. It was noted that the 215 Contractor committed to accomplish their review of "closed" IR's via implementation of their documentation re-review effort on the system-by-system basis. Document package SW-291-1.6 containing IR 3674 was reviewed in December 1981 and no deficiencies were identified.

6. Quality concerns raised by task force members became an issue at WNP-2 early in 1981. The manager of the Task Force instructed team leaders to review letterbooks to assure that no unanswered quality concerns existed. Since RCSW-80-172 was voided it would not have been a part of this review. This activity was completed and documented by memo F-81-2147, dated March 6, 1981, to all Task Force members, in which the Task Force Manager re-emphasized their capability to document concerns and receive appropriate attention.

In summary, it appears the memo documenting the Task Force member's concern with IR 3674 was an isolated case. Based on his Supervisor's note, the Task Force member was expected to edit and re-submit the memo. In any case, the IR was addressed as part of the overall 215 Contractor review, as well as by the RCSW Task Force IR review.

Corrective Steps That Are Planned

There are no additional corrective actions planned to be taken regarding this issue.

Date When Corrective Action Will Be Complete

Corrective actions noted herein in Items 1 through 6 have been completed, as noted.