

Washington Public Power Supply System

Box 1223 Elma, Washington 98541 (206) 482-4428

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REGION VICE

Docket No. 50-508

March 30, 1983
G03-83-275

U. S. Nuclear Regulatory Commission, Region V
Office of Inspection and Enforcement
1450 Maria Lane, Suite 260
Walnut Creek, California 94596-5368

Attention: Mr. D. M. Sternberg, Chief
Reactor Projects Branch No. 1

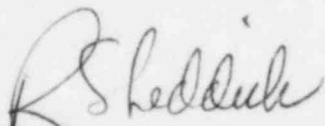
Subject: NRC INSPECTION AT WNP-3
NONCOMPLIANCE 50-508/83-02/01
FAILURE TO FOLLOW PROCEDURES -
MANDATORY HOLD POINT NOT OBSERVED

Reference: NRC Letter, Docket No. 50-508, Mr. D. M. Sternberg to
Mr. R. S. Leddick, NRC Inspection at Washington Nuclear
Project No. 3 (WNP-3), dated December 2, 1982.

The referenced letter reported the results of the NRC inspection
conducted on January 17-21, 1983 at WNP-3. One (1) 10CFR50, Appendix
B, Violation (subject noncompliance) was identified.

Attached is a Supply System approved report detailing corrective/
preventive actions and date of full compliance for the subject non-
compliance. The Supply System will consider the violation to be
satisfactorily resolved by the April 15, 1983 date of full compliance.

Should you have any questions or desire further information, please
contact me directly.



R. S. Leddick (760)
Program Director, WNP-3

DRC:nj

Attachment

cc: J. Adams - NESCO
D. Smithpeter - BPA
Ebasco - New York
WNP-3 Files - Richland

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PDR ADOCK 05000508
Q PDR

ATTACHMENT TO: Letter, G03-83-275, dated March 30, 1983.

VIOLATION (Noncompliance 50-508/83-02/01)

10CFR50, Appendix B, Criterion V states, in part, that: "Activities affecting quality shall be prescribed by...procedures...and shall be accomplished in accordance with these...procedures."

Paragraph 17.1.5 of the Quality Assurance Program documented in approved PSAR Deviation No. 26-WP, states, in part, that: "Contractors and vendors, including Ebasco...are required to have written...procedures...which govern their quality related activities..."

Ebasco Project Specification No. 3240-551, Installation of Piping, Section 7.4.5 states, in part: "The Contractor shall assure that damage to the valve does not happen during installation...This shall include...position of valve when welding (open/closed)..."

The ASME Boiler and Pressure Vessel Code, Section III, 1977 Edition including addenda through Summer 1978, requirement NCA-4134.10(c) states, in part: "Mandatory hold points...shall be indicated in the controlling documents...work shall not proceed beyond mandatory hold points without the consent of the Certificate Holder's representative..."

Peter Kiewit Sons' Procedure No. PKS-cp-3, Pipe Fabrication and Installation Procedure, Section 4.8, states, in part: "For WPPSS Quality Class I, PQA shall prepare the Inspection/Examination Data Report...and indicate 'Hold Points'..."

Peter Kiewit Sons' Procedure No. PKS-WI-304, Work Instruction for Valve Installation, Section 7.1, states, in part: "Inspection and examination shall be performed in accordance with the Work Release Program...utilizing the Inspection/Examination Data Report (I/EDR)..."

Contrary to the above, on January 20, 1983 the inspector identified that work had proceeded beyond the mandatory hold point designated on Work Release Drawing No. 3AF-A12-41 and on the Inspection/Examination Data Report. The hold points designated on these documents were to provide verification that the valve was in the open position when welded in order to prevent damage to the valve (No. 3AF-VD018SB).

Corrective Steps Taken and Results Achieved

The Contractor's (Peter Kiewit Sons') Quality Engineer normally verifies and documents valve position (open/closed) hold points during the cleanliness inspection, prior to fit-up. For the violation cited above, the Quality Engineer performed the cleanliness inspection; however, he failed to document the valve position on the controlling documents (e.g., Work Release).

Based on the above, the following actions were taken:

- Since the verification was not documented and the Quality Engineer was no longer on site for questioning, the valve condition was considered indeterminate and a Nonconformance Report (NCR) was generated accordingly. The NCR disposition required disassembly of the valve and inspection for damage.

VIOLATION (Noncompliance 50-508/83-02/01) (Continued)

Corrective Steps Taken and Results Achieved (Continued)

- A review of all available open Work Releases (854 total) that involved valve hold points was performed. Two similar instances were found that resulted in the generation of two additional NCRs. These NCRs were also dispositioned to require valve disassembly and inspection. It should be noted that these two instances involved a different Quality Engineer (in the same area) who is also no longer on site and available for questioning.
- A sample of 182 (34%) of approximately 525 closed Work Releases was reviewed and found acceptable.

Corrective Steps Taken to Avoid Further Items of Noncompliance

Documented training on "valve hold points" was provided to all PKS Quality Engineering personnel assigned to areas applicable to such hold points. The training was conducted on January 20, 1983.

Prior to closure, all Work Releases are reviewed on an on-going basis by the cognizant Quality Engineer, Quality Engineer Supervisor and the Quality Assurance Group. The discrepant Work Release cited by the NRC Inspector and the two found by the subsequent review of all open Work Releases were in process and had not yet received this routine review. It is the Supply System's opinion that the violations would have been detected during this review. This conclusion is supported by the results of the review of closed Work Releases which are discussed above in the "Corrective Steps Taken and Results Achieved." Based on this, programmatic changes to preclude recurrence are not necessary.

Date of Full Compliance

Disposition of the NCRs noted above will be completed by April 15, 1983. Upon satisfactory disposition of these NCRs, full compliance will be achieved.