

Arizona Public Service Company

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U. S. Nuclear Regulatory Commission  
Region V  
Creskide Oaks Office Park  
1450 Maria Lane - Suite 210  
Walnut Creek, California 94596-5368

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

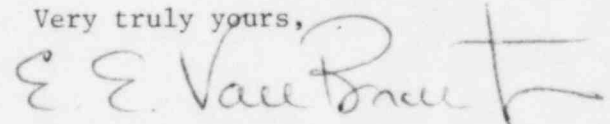
Subject: NRC I&E Inspection of January 4-7, 17-21, 1983  
File: 83-019-026  
D.4.33.2

Dear Sir:

This letter refers to the special Inspection conducted by Mr. P. P. Narbut on January 4-7 and 17-21, 1983, as documented in your letter of March 2, 1983, of activities authorized by the Nuclear Regulatory Commission (NRC) Construction Permit No. CPPR-141.

During this Inspection, two (2) items of noncompliance were identified. Our response to these items of noncompliance (Severity Level V-Supplement II) is presented in the enclosed Attachment A.

Very truly yours,



E. E. Van Brunt, Jr.  
APS Vice President  
Nuclear Projects  
ANPP Project Director

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PDR ADOCK 05000528  
Q PDR

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Enclosure

cc: T. G. Woods, Jr.  
G. C. Andognini  
J. R. Bynum  
D. B. Fasnacht  
A. C. Rogers  
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A. C. Gehr  
W. H. Wilson  
R. L. Patterson  
R. M. Grant  
D. R. Hawkinson

STATE OF ARIZONA     )  
                                  ) ss.  
COUNTY OF MARICOPA )

I, E. E. Van Brunt, Jr., represent that I am  
Vice President, Nuclear Projects of Arizona Public Service  
Company, that the foregoing document has been signed by me  
on behalf of Arizona Public Service Company with full  
authority so to do, that I have read such document and know  
its contents, and that to the best of my knowledge and belief,  
the statements made therein are true.

Eduin E. Van Brunt

Sworn to before me this 5<sup>th</sup> day of April,  
19 83.

David L. Graham  
Notary Public

My Commission Expires:

May 19, 19 86

ATTACHMENT A

NOTICE OF VIOLATION

Docket No. 50-528

Construction Permit No. CPPR-141

As a result of the Inspection conducted on January 4-7 and 17-21, 1983, and in accordance with the NRC Enforcement Policy 10CFR Part 2, Appendix C, 47FR9987 (March 9, 1982), the following Violations were identified:

- A. 10CFR50, Appendix B, Criterion V, as addressed in Section 17 of the PSAR, states, in part: "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings...."

Bechtel Welding Standard WD-1, Revision 1, dated February 17, 1981, Paragraph 1.3, states:

"This procedure includes checklists and other forms to be used for documenting satisfactory accomplishment of the fabrication and examination processes. The use of these checklists and forms provides assurance that welding is performed and examined in accordance with specified procedures, that welding procedures and welders and/or welding operators are qualified in accordance with the ASME Code, Section IX, and that specified and certified materials are used for fabrication. Provisions are made for witnessing or inspecting by the Authorized Nuclear Inspector (ANI)."

Contrary to the above, on or about February 12, 1982, an unauthorized, undocumented weld was made in Line RDB-012-XCCA-4" one inch (1") North of Field Weld FW-302 shown on MCN-1-10441P dated January 9, 1982. The weld was subsequently ground even with the pipe on the outside and inside diameter to make visual detection of the weld difficult.

This is a Severity Level V Violation (Supplement III), applicable to Unit #1.

Response to Item A

1. Corrective Steps Taken and Results Achieved

Nonconformance Report No. WA-673 was prepared describing the presence of the undocumented weld. The disposition required replacing a six-inch (6") length of pipe that included the weld in question, as well as the sockolet and two (2) welds, FW-302 and FW-303.

2. Corrective Steps That Have Been Taken to Avoid Further Noncompliances

The allegor claims he made the weld in question. He did not claim to have knowledge of any others. This is considered an isolated incident. However, the implications of this incident, and the serious nature of the Violation, will be discussed with all welder foremen to reemphasize the absolute necessity to comply with all jobsite procedures controlling welding operations.

3. Date When Full Compliance Will Be Achieved

Full compliance was achieved on March 15, 1983, with the completion of the work described on Nonconformance Report No. WA-673. The work was performed, inspected and documented in accordance with approved Project procedures.

Discussions with all welder foremen will be accomplished by April 15, 1983.

B. 10CFR50, Appendix A, Criterion 1, states, in part:

"Structures, systems and components important to safety shall be designed, fabricated, erected and tested to quality standards commensurate with the importance of the safety functions to be performed. Where generally recognized codes and standards are used, they shall be identified....to assure a quality product in keeping with the required safety function.

The Arizona Nuclear Power Project Design Criteria Manual, Part III, Revision 3, dated October 5, 1979, for the "Radioactive Waste Drains System", Paragraph 1.2.b, identifies "American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section III" as the applicable Code for "Piping and Valves Auxiliary Building Engineered Safety Features (ESF) Room Drainage".

The ASME Boiler and Pressure Vessel Code, Section III, Subsection ND, 1974 Edition, including the Winter 1975 Addenda, Paragraph ND 3676.9, states: "Supports shall be furnished as specified in Subsection NF to protect piping against detrimental sagging, external mechanical injury, abuse and exposure to unusual service conditions."

Contrary to the above, pipe supports were not engineered or provided for the Radioactive Waste Drain System Piping added to Drawing No. 13-P-ZAE-200, Revision 6, by Drawing Change Notices (DCN's) No. 7 and No. 8. The piping was installed without pipe supports as authorized by Modification Change Notice No. 1-10441P, dated January 9, 1982, which was verified complete by the Quality Control Inspector on March 4, 1982.

This is a Severity Level V Violation (Supplement II), applicable to Unit #1.

Response to Item B

1. Corrective Steps Taken and Results Achieved

The cause is attributed to oversight. The original design did not require supports; however, the design change which added drain pipes should have also required the installation of pipe supports. Engineering has analyzed the subject lines shown on Drawing No. 13-P-ZAE-200 and the following supports were designed January 27, 1983 and were installed in Unit #1 by March 23, 1983, as per Design Change Package (DCP) No. 1-SS-RD-013:

<u>Pipe Support No.</u>	<u>Line No.</u>
13-RD-006-H-00A	RD-A-006-XCCA-1"
13-RD-006-H-001	RD-A-006-XCCA-4"
13-RD-012-H-00A	RD-B-012-XCCA-1"
13-RD-012-H-001	RD-B-012-XCCA-4"
13-RD-151-H-001	RD-A-151-XCCA-4"
13-RD-153-H-001	RD-B-153-XCCA-4"

These pipe supports were added to the IE Bulletin No. 79-14 program and have been verified as having been installed in accordance with the design drawings. The supports for Units #2 and #3 will be installed in accordance with DCP's No. 2-CS-RD-013 and No. 3-CS-RD-013, respectively.

2. Corrective Steps That Have Been Taken To Avoid Further Noncompliances

To prevent a similar occurrence in the future, all piping design changes, as documented by Field Change Requests and Drawing Change Notices, are being supplied to the Pipe Stress and Support group. These are evaluated for the necessity of new or revised pipe support designs. The corrective action for this item of noncompliance is considered complete and no further action is required.

3. Date When Full Compliance Will Be Achieved

Full compliance for Unit #1 was achieved by March 23, 1983. The supports for Units #2 and #3 will be installed in accordance with the Design Change Packages referenced above.