

Washington Public Power Supply System

P.O. Box 968 3000 George Washington Way Richland, Washington 99352 (509) 372-5000

Docket No. 50-397

September 29, 1983
G02-83-874

Mr. J. B. Martin
Regional Administrator
U.S. Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596

Subject : NUCLEAR PROJECT 2
NRC INSPECTION REPORT 83-38 NOTICE OF VIOLATION

Reference : Letter D. M. Sternberg to C. S. Carlisle, dated
August 30, 1983

Washington Public Power Supply System hereby replies to the Notice of Violation designated "F" in Appendix A of the referenced letter.

Our reply, pursuant to the provisions of Section 2.201 of the NRC's "Rules of Practice" Part 2 Title 10 Code of Federal Regulations, consists of this letter and Attachment 1, which contains our response to this Notice of Violation.

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


C. S. Carlisle - 901A
Program Director, WNP-2

HAC/fl

Attachment

cc: Mr. R. T. Dodds, NRC RV
Mr. A. D. Toth, NRC Resident, WNP-2

8310170507 831007
PDR ADOCK 05000397
Q PDR

Attachment 1

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

RESPONSE TO INSPECTION REPORT 83-38
NOTICE OF VIOLATION

Statement of Violation

"As a result of the special inspection conducted by the NRC Construction Appraisal Team on May 16-27 and June 6-22, 1983, and in accordance with the NRC Enforcement Policy, 10 CFR Part 2 Appendix C, the following violations were identified:

Criterion V of 10 CFR 50 Appendix B requires, in part, that "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. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

The FSAR for the WNP-2 project, Section 17.1.1.5, accordingly describes that activities affecting quality are described in procedures, instructions, and drawings and that activities are conducted in accordance with these documents. Procedures, instructions, and drawings include adequate quantitative and qualitative acceptance criteria to ascertain that the prescribed activities have been satisfactorily accomplished."

- F. The Fischbach/Lord procedure CP/QAP-505 requires minimum spacing of 6 inches between concrete anchors. The weld details for electrical tray support RB-42-47 requires a full length fillet weld (17-3/4 inch) for stiffener plates in the W21x82 beam, and two hanger members of 4x3x3/8 inch size. The weld details for electrical tray support TS-4935 requires a groove weld between each of two vertical members and the horizontal member. Design drawing FSK-349 requires washers on concrete anchor bolts for motor control centers MC-S2-1A-A and MC-S2-1A-B, and removal of a maximum of two existing base--channel bolts. Installation procedures require a minimum 45 foot--pounds torque on concrete anchors for motor control center MC-8A.

Contrary to Criterion V, 10 CFR, Appendix B, cited above, and the above requirements, the following conditions existed in electrical raceway support and motor control center installations when measured by NRC inspectors during the inspection.

- (a) Raceway supports RB-42-1350: One concrete anchor was 3 5/8 inches from an anchor in adjacent support TS-4181.

- (b) Raceway support RB-42-47: An 8" long fillet weld existed at the stiffener plate and two hanger members were 4x3x1/4 inch in size.
- (c) Raceway support TS-4935: Two groove welds were missing at the vertical/horizontal member interface.
- (d) Motor control center MC-S2-1A-A: Three base channel bolts and washers were missing.
- (e) Motor control center MC-S2-1A-B: Washers were missing.

This is a Severity Level IV violation, (Supplement II)."

Supply System Response

Each of the five specific deficiencies listed in the Notice of Violation have been recorded on a project Nonconformance Report (NCR) or Notice of Potential Deficiency (NOPD). The deficiency documents and dispositions are as follows:

- (a) Raceway supports RB-42-1350: One concrete anchor was 3 5/8 inches from an anchor in adjacent support TS-4181. NCR 22109; disposition: "use as is".
- (b) Raceway support RB-42-47: An 8" long fillet weld existed at the stiffener plate and two hanger members were 4"x3"x1/4" in size. NCR-21933; disposition NCR voided, design detail permits this configuration so no nonconformance exists.
- (c) Raceway support TS-4935: Two groove welds were missing at the vertical/horizontal member interface. NCR 22070; disposition: "use as is".
- (d) Motor control center MC-52-1A-A: Three base channel bolts and washers were missing. NOPD-183; disposition, two of three bolts not required per FSK-349. Washers required only on slotted holes; installation acceptable as is without washers. SDR-E-9255 written to track installation of missing bolt.
- (e) Motor control center MC-52-1A-B: Washers were missing. NOPD 363; disposition: "use as is".

Final inspections and as-building performed by Fischbach/Lord Quality Control (F/L QC) on tray supports under their restart program were monitored by the Bechtel Quality Control contractor surveillance program. The results of this surveillance program were satisfactory. In addition, Bechtel Quality Assurance, in an audit of the F/L Quality Assurance

program sampled raceway supports. With one minor deviation that was corrected, Bechtel QA found F/L's raceway support installations to be satisfactory.

In conjunction with the effort to resolve the questions raised by the Construction Appraisal Team related to bolting and torquing, analysis of cable tray splices and electrical equipment mounting has been performed. The Supply System has concluded, based on the results of these assessments and inspections, that the aforementioned types of installations are adequate.

Westinghouse has been tasked by the Supply System to perform a third-party assessment of tray and conduit supports. Westinghouse concluded, on the basis of a sampling program, that construction in this area was adequate.

A copy of the Westinghouse final report on this assessment will be provided to Region V by separate letter.

Based on the Bechtel surveillances, the assessments and inspections of torquing and bolting, and the Westinghouse sample, the Supply System concludes that the deviations from requirements observed in QC-accepted hardware are isolated instances and not repetitive in nature.

Corrective Action to Preclude Repetition

The specific deficiency noted in Item D of the Notice of Violation has been placed in the project tracking system.

Date of Full Compliance

The specific deficiency will be corrected by November 1, 1983.