



USNRC REGION II
ATLANTA, GEORGIA

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**Florida
Power**
CORPORATION

December 16, 1983
3F1283-24

Mr. James P. O'Reilly
Regional Administrator, Region II
Office of Inspection & Enforcement
U.S. Nuclear Regulatory Commission
101 Marietta Street N.W., Suite 2900
Atlanta, GA 30303

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
IE Inspection Report No. 83-14

Dear Mr. O'Reilly:

Florida Power Corporation provides the attached supplemental response to the subject inspection report. Should there be any questions concerning this information, please contact this office.

Sincerely,

G. R. Westafer
Manager, Nuclear Operations
Licensing and Fuel Management

GRW/feb

Attachment

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INSPECTION REPORT 83-14
December 16, 1983
SUPPLEMENTAL RESPONSE

VIOLATION

10 CFR 50.55a(g)(4) as implemented by the Technical Specification paragraph 4.0.5, requires in part that the surveillance program of Class 1, Class 2, ...components shall comply with ASME Code Section XI 1974 Edition thru Summer 1975 Addenda. IWB/IWC-2520 of ASME Code Section XI requires that volumetric examination of pipe welds includes... the base metal for one-wall thickness beyond the edge of the weld.

Contrary to the above, on May 19, 1983, volumetric examination of certain pipe welds was not in compliance with IWB/IWC-2520 requirements in that:

1. Radiographic procedure RT-002 did not address base metal coverage of one-wall thickness beyond the edge of the weld as required.
2. On pipe welds figures C2.1.16 and C2.1.4, film position on certain weld locations was such that it failed to adequately cover base metal for one-wall thickness as required.

This is a Severity Level IV Violation (Supplement I).

RESPONSE

- (1) FLORIDA POWER CORPORATION'S POSITION: Florida Power Corporation agrees with both examples of non-compliance with regard to the requirements in IWB/IWC-2520 of ASME Section XI.

Film placement for pipe weld figure No. C2.1.4 was such that it did not include the base metal for one-wall thickness beyond the edge of the weld. Film placement for pipe weld figure No. C2.1.16 is questionable because the edge of the weld is not clearly defined on the radiograph and thus is considered unacceptable.

- (2) DESIGNATION OF APPARENT CAUSE: This violation was caused by a procedural inadequacy. Apparently when RT-002 was written the weld coverage requirement in IWB/IWC-2520 was omitted.
- (3) IMMEDIATE CORRECTIVE ACTIONS: All Florida Power Corporation radiographers have been informed of the ASME Section XI weld coverage requirements. A request to revise RT-002 to include weld coverage requirements has been initiated.

Pipe weld figure No. C2.1.4 was re-examined to assure adequate weld coverage. This second radiograph did not disclose any defects in the weld area.

- (4) LONG TERM CORRECTIVE ACTIONS: Pipe weld figure No. C2.1.16 will be re-examined during Refuel V. Radiography of this weld prior to plant start-up from Refuel IV (current outage) is not practical because it will require extensive insulation removal and draindown of the main feedwater header and partial draindown of one Steam Generator.

To assure that further violations have not occurred due to this inadequate procedure, Florida Power has reviewed all other applicable welds to verify proper weld coverage. The review of the ten film packages did not reveal any discrepancies other than those initially identified in the subject report.

- (5) DATE OF FULL COMPLIANCE: The Revision of RT-002 is scheduled to be approved and implemented by August 1, 1983.