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USNRC REGION II
ATLANTA, GEORGIA

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Georgia Power

the southern electric system

D. O. Foster
Vice President and General Manager
Vogtle Project

September 30, 1983

United States Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 3100
101 Marietta Street
Atlanta, Georgia 30303

File: X7BG10
Log: GN-263

Reference: 50-424/83-16
50-425/83-16

Attention: R. C. Lewis

Gentlemen:

The Georgia Power Company wishes to submit the following information concerning the violation discussed in your inspection report 50-424/83-16 and 50-425/83-16.

We do not concur with the finding identified concerning "Failure to Establish Adequate Radiography Procedure" nor do we concur with the interpretation of the ASME Boiler and Pressure Vessel Code, 1974 Edition through Summer 1975 Addenda (hereafter referred to as the "Code"), that the "area of interest", used primarily in Section V of the Code to define the area of a weld to be shown on a radiograph, includes the heat-affected zone. Our position is based on the following information gathered by our code experts:

1. Paragraph T-282 of Article 2, Section V of the Code gives the minimum requirements for radiography procedures. This paragraph contains no requirement for including the heat affected zone in the area of interest and specifying this in the procedure.
2. Paragraph UW-52 of Section VIII of the Code requires spot radiography of vessels that have butt-welded joints that are not radiographed for their full length. UW-52 refers to paragraph UW-51 for standards relative to radiographic examination of welded joints. Neither of these paragraphs require that the heat-affected zone be included in the area of interest. Paragraph UW-51 requires that radiographs be examined in accordance with Article 2, Section V of the Code.

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3. Appendix A of Section V of the Code gives the following definition: Area of Interest - This includes the portion of the object in the radiograph that is to be interpreted.
4. Code Interpretation III-82-27 dated April 9, 1983, File No. NI-81-162, reads:

Question: What extent of area beyond the weld metal is to be included in the radiographing of welds when required by NX-5200?

Reply: The radiography requirement of NX-5200 is limited to the width of the weld metal.

Since Section III of the Code is more restrictive than Sections V or VIII, we hold that this interpretation is also valid for those sections.

The Georgia Power Company is committed to meeting the requirements of the Code in the examination of welds at Plant Vogtle. While we do not deny that the heat-affected zone of a weld should be given proper consideration during welding inspections, it remains our position that failure to designate the heat-affected zone as part of the area of interest in radiography procedures and failure to maintain film density of 3.80 over the entire heat-affected zone of a radiograph do not constitute violations of the Code. To further clarify this question, we have addressed the following question to the ASME Boiler and Pressure Vessel Code Committee for Section VIII:

To what extent of area beyond weld metal is to be included in the radiographing of welds when required by UW-52 and required for interpretation by UW-51(b), (1) through (4)?

When a reply to this question is received, the Georgia Power Company will take whatever actions that are necessary to ensure we are in full compliance with Code requirements.

This response contains no proprietary information and may be placed in the NRC Public Document Room upon receipt.

Yours truly,


D. O. Foster

REF/DOF/cc

xc: U. S. Nuclear Regulatory Commission
Attn: Victor J. Stello, Jr., Director
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Washington, D. C. 20555

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