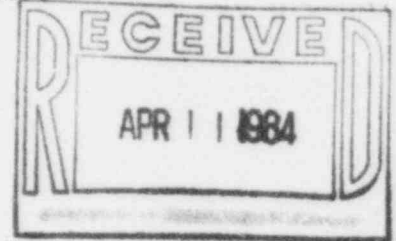


The Light company

Houston Lighting & Power P.O. Box 1700 Houston, Texas 77001 (713) 228-9211

April 6, 1984
ST-HL-AE-1079
File No.: G2.4/M22.3/Q17.1.1/
P11.1



Mr. John T. Collins
Regional Administrator, Region IV
Nuclear Regulatory Commission
611 Ryan Plaza Dr., Suite 1000
Arlington, Texas 76012

Dear Mr. Collins:

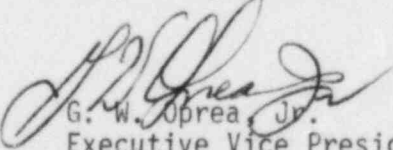
South Texas Project
Units 1 & 2
Docket Nos. STN 50-498, STN 50-499
Response to Notice of Violation

Pursuant to the provisions of 10CFR2.201, attached is Houston Lighting & Power Company's (HL&P) response to the Notice of Violation 50-498/84-02, 50-499/84-02 dated March 21, 1984.

For reasons stated in the attachment, HL&P concludes that no violation occurred and requests that the Notice of Violation be withdrawn.

If you should have any questions regarding this matter, please contact Mr. Michael E. Powell at (713) 993-1328.

Very truly yours,


G. W. Oprea, Jr.
Executive Vice President

GW0/DJH/mpg
Attachment: Response to Notice of Violation (84-02)

8404260392 840423
PDR ADOCK 05000498
Q FDR

Houston Lighting & Power Company

April 6, 1984
ST-HL-AE-1079
File Number: G2.4/M22.3/
Q17.1.1/P11.1

Page 2

cc:

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Route 1, Box 1684
Brazoria, TX 77422

Revised 03/28/84

SOUTH TEXAS PROJECT
RESPONSE TO NOTICE OF VIOLATION
50-498/84-02
50-499/84-02

I. Statement of Apparent Violation

10 CFR 50, Appendix B Criteria IX requires nondestructive testing to be controlled and accomplished in accordance with applicable codes, standards, specifications, criteria, and other special requirements.

Site Radiographic Procedure NDE-002-1 invokes Section II, 1974 Edition through winter 1975 addenda, Class 2, NC5320 for acceptance/rejection criteria. The following is quoted from the site radiographic procedure and ASME Section III. "Sections of weld that are shown by radiography to have any of the following types of discontinuities are unacceptable.(a) Any type of crack or zone of incomplete fusion or penetration. The proper disposition of lack of penetration is repair of the affected area."

Contrary to the above, an NRC review of radiographs during January 9-19, 1984, disclosed that the ASME Code Class 2 inspected and accepted weld CS2007FW0001, contained a zone (RT Station 11 to 13) of incomplete penetration which was erroneously accepted (as suck back) by site personnel.

This a a Severity Level IV Violation (Supplement II).

II. Reply

This item was identified by Mr. H. W. Kerch (USNRC) as a result of a review of completed Ebasco Services Incorporated (ESI) radiographs in the Records Management System (RMS) vault. Houston Lighting & Power (HL&P) Quality Assurance Department issued a Nonconformance Report (NCR) and a Corrective Action Request (CAR) to investigate Mr. Kerch's concern. As part of this investigation, ESI performed an additional radiograph of the area using a single wall radiographic technique (RT No. 1584A) and, per ASME III NC4424(a), made tracings of this radiograph for comparison with the actual weld root contour. Five NDE Level III Inspectors from ESI Corporate, ESI Site QA, ESI Site NDE Lab, HL&P, and Bechtel Energy Corporation (BEC) reviewed the radiographic film and visually inspected the inner diameter (ID) of the weld.

All agreed that the indication was a rough ID surface along the edge of the weld root, and that the weld had full penetration and was code acceptable.

In order to have complete assurance that the STP welding program is adequately assessing the quality of safety-related welds, HL&P contacted Southwest Research Institute (SRI) to review the weld in question. Mr. Paul D. Watson (NDE Level III) examined the original radiograph, two (2) additional sets of film, and visually inspected the ID of the weld. The visual inspection included the use of inspection light shadowing techniques. Mr. Watson identified a weak linear indication, but did not interpret the

indication to be caused by an incomplete penetration (IP) flaw. The basis for this judgment is that the root pass is very uniform around the circumference of the pipe, although the profile is flat at the 6 o'clock position (RT Station 11 to 13). The width of the root pass is approximately 3/16 inch, with no evidence of root closure which can cause IP to occur. Also, the indication is very faint which indicates it might be due to a surface condition rather than a welding flaw. In order to verify that the root pass was fully fused and displayed full penetration, Mr. Watson witnessed a liquid penetrant (PT) examination performed by ESI quality control personnel. The PT examination revealed no evidence of an incomplete fusion (IF) or IP flaw. Based on the results of the RT film review, the visual examination, and the PT examination performed on the suspect area of the weld, Mr. Watson concluded that the flaw indication was not caused by either IF or IP. It is Mr. Watson's opinion that the weak RT indication was caused by ID counterbore tool marks being superimposed upon the edge of a flat root bead profile.

In summary, five (5) STP NDE Level III examiners reviewed the radiographic film and visually compared the ID surface with the indication on the film. They all agreed that the very faint indication on the original radiograph was caused by a rough ID surface and that the weld had full penetration. The extensive evaluation performed by SRI completely supported this conclusion.

The results of this investigation support HL&P's confidence in the STP welding program and our conclusion that no violation occurred.

III. Corrective Steps Which Have Been Taken and the Results Achieved

The investigation of this matter is fully described in Section II above.

IV. Corrective Action Which Will Be Taken to Avoid Further Violations

Corrective action is not necessary as the investigation documented the quality of the weld in question and the adequacy of the STP welding program.

V. Date When Full Compliance Will be Achieved

HL&P continues to be in compliance with 10 CFR 50, Appendix B Criterion IX, ASME section III, and Site Radiographic Procedure NDE-002-1.