

Washington Public Power Supply System

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Docket No. 50-397

May 5, 1983
G02-83-409

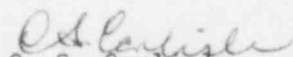
Mr. D. M. Sternberg
Chief, Reactor Projects
Branch No. 1
U. S. Nuclear Regulatory Commission
1450 Maria Lane, Suite 210
Walnut Creek, California 94596

Subject: NUCLEAR PROJECT NO. 2
NRC INSPECTION 82-27 - NOTICE OF VIOLATION

Reference: 1. Letter D.M. Sternberg to R.G. Matlock
dated January 4, 1983
2. Letter R.G. Matlock to D.M. Sternberg
dated February 2, 1983 (No. G02-83-88)

The Washington Public Power Supply System hereby provides an amended reply to the Notice of Violation transmitted as Appendix 'A' via the Reference 1 letter and initially responded to in the Reference 2 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 amended response to the 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
Program Director, WNP-2

RTJ/jdb

Attachment: Amended Response to Notice of Violation

cc: W.S. Chin, BPA - Site
A. Forrest, Burns and Roe - HAP0
N.D. Lewis, EFSEC
A. Toth, NRC Resident Inspector (917Q)
Document Control Desk, NRC
WNP-2 Files (917B/917Y)

Attachment 1

SUPPLEMENTAL RESPONSE TO INSPECTION REPORT 82-27 NOTICE OF VIOLATION

The Supply System provides the following supplemental/amended response to Item B of Appendix A "Notice of Violation" regarding welding of pipe support strut end brackets. For purposes of clarity, the initial response is repeated, followed by the amended response as required.

- B. Criterion V of 10CFR50 Appendix B states: "Activities affecting quality shall be prescribed by documented instructions, procedures or drawings, of a type appropriate to the circumstances and ... shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

Contrary to the above, on November 17, 1982, the Bechtel Quality Control Inspectors had unavailable to them appropriate inspection instructions for evaluation of welds of pipe support strut end brackets to piping curved surfaces. Such a weld on Support MSRV-4A-1 was designated as a flare-bevel weld with 5/16-inch reinforcement. The bracket actually used, and not prohibited, did not have a flare configuration; nor was the pipe curvature sufficient to result in a flare bevel configuration. The weld was accepted by a Quality Control Inspector on November 9, 1982. However, the weld throat was less than specified by design, to the extent that the piping curvature resulted in weld root gap of greater than 1/8-inch.

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

SUPPLY SYSTEM RESPONSE

The subject potential nonconformance was documented on Nonconformance Report (NCR) No. 250-020512 dated December 22, 1982. This condition was dispositioned as acceptable-as-is by the Architect/Engineer. In addition, a Project Engineering Directive (PED) No. 215-H-H122 was issued January 4, 1983, to provide clarification of the welding requirements for these types of installations. The engineering direction provided states, in essence, that weld leg size must be increased to compensate for gaps of up to 1/8-inch between the end bracket and the curved surface. For gaps larger than 1/8-inch the flare groove weld will provide specified strength when combined with the specified fillet weld.

AMENDED RESPONSE

None

Corrective Action Taken to Preclude Recurrence

The Architect Engineer has reviewed Quality Class I and ASME hanger detail drawings and determined that twelve (12) supports have been installed which utilize the subject end bracket weld configuration. A reinspection of the

welds for these 12 brackets is scheduled to be performed by Bechtel Quality Control personnel and Burns and Roe Field Engineers. The results of these reinspections will be provided to the Architect Engineer for evaluation of acceptability. The necessity for any required rework will be determined based upon the results of this reinspection program.

AMENDED RESPONSE

As a result of the review of additional design data, it has been determined that there are small bore pipe hanger installations which also utilize the subject end bracket weld configuration. Reinspection of all large and small bore type bracket installations has been completed and, after subsequent engineering analysis, no additional rework or welding is required.

Thirteen (13) large bore supports and six (6) small bore supports were evaluated and deemed acceptable "as-is".

BRI has committed to revise the design criteria, M400 Design Guide, to instruct the designer to specify fillet welds over a "battered" surface. The "battering" will provide a flat surface for the fillet weld and preclude the use of flare bevel welds. Therefore, for all future designs no flare bevel welds will be specified for the subject configuration except in those small diameter designs where the pipe size and bracket size would require flare bevel welds due to geometry.

Date of Full Compliance

The reinspection of the 12 supports will be complete by February 25, 1983. The results of the Engineer's evaluation will be made available to the Resident Inspector by March 11, 1983.

AMENDED RESPONSE

Full compliance will be achieved April 29, 1983, when the M400 Design Guide is revised, as noted above.