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July 10, 1984
ANPP-29924-WFQ/TJB

REGION VICE

U.S. Nuclear Regulatory Commission
Region V
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1450 Maria Lane, Suite 210
Walnut Creek, CA 94596-5368

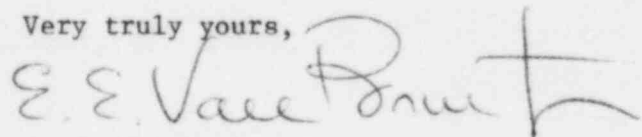
Attention: Mr. T. W. Bishop, Director
Division of Reactor Safety and Projects

Subject: Notice of Violation
File: 84-019-026; D.4.33.2

Reference: NRC's Letter from T. W. Bishop to E. E. Van Brunt, Jr. dated
June 8, 1984

This letter refers to the inspection conducted by Messrs. P. P. Narbut, J. Burdoin, J. Ball, K. Ivey, C. Myers, D. Pereira, J. Tatum and D. Hollenbach between April 9-20, 1984. Our response to the Notice of Violation and to the Notice of Deviation of the referenced letter is enclosed in Attachment A and Attachment B, respectively. Responses to the issues addressed in paragraphs 5.b.3 (a) and 5.b.3 (b) of the referenced letter will be submitted under separate cover by July 13, 1984.

Very truly yours,



E. E. Van Brunt, Jr.
APS Vice President
Nuclear Production
ANPP Project Director

EEVBJr/TJB/wpc

Attachments

cc: See Page Two

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Mr. T.W. Bishop
ANPP-29924
Page Two

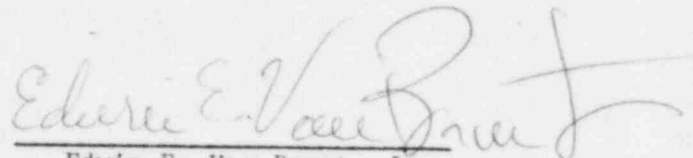
cc: Richard DeYoung, Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

T. G. Woods, Jr.
D. B. Karner
W. E. Ide
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K. W. Gross
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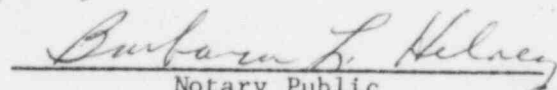
Records Center
Institute of Nuclear Power Operations
1100 Circle 75 Parkway, Suite 1500
Atlanta, GA 30339

STATE OF ARIZONA)
) ss.
COUNTY OF MARICOPA)

I, Edwin E. Van Brunt, Jr., represent that I am Vice President, Nuclear Production, of Arizona Public Service Company, that the foregoing document has been signed by me on behalf of Arizona Public Service Company with full authority to do so, that I have read such document and know its contents, and that to the best of my knowledge and belief, the statements made therein are true.


Edwin E. Van Brunt, Jr.

Sworn to before me this 10th day of July, 1984.


Notary Public

My Commission Expires:

September 5, 1987

ATTACHMENT A

NOTICE OF VIOLATION

- A. 10 CFR 50 Appendix B Criterion V, as addressed in Section 17 of the PSAR, states, in part: "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...."

Specification 13-PM-204, Revision 13 dated February 23, 1984
"Specification for Field Fabrication and Installation of Nuclear Piping Systems", paragraph 2.3 requires that all work be performed in accordance with ASME Section IX, Welding Qualifications.

The 1983 Edition of ASME Section IX including the Summer 1983 Addenda Article III, paragraph QW-304 requires each welder who welds shall have passed the tests prescribed for qualification.

Code Interpretation IX-79-02 issued January 3, 1979 states that there are no code provisions to permit qualification of a welder after the completion of production welding.

Contrary to the above, the engineering approvals of Corrective Action Request (CAR) C83-153N dated October 4, 1983 and Nonconformance Reports (NCR's) WC-733, WA-753, WC-806, WA-688 and WC-557 dated April 13, 1983, May 19, 1983, August 31, 1983, February 10, 1983 and May 12, 1982 respectively, authorized qualification of welders after the completion of production welding.

This is a Severity Level IV Violation (Supplement II) applicable to Units 1, 2 and 3.

RESPONSE TO NOTICE OF VIOLATION

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

The program at Palo Verde requires the use of only certified welders. The program for selection and verification of properly certified welders at Palo Verde is consistent with the ASME Code and has achieved excellent results. In cases where errors have been made in the welder selection process, the program has identified the deficiency via NCR's, and had the condition dispositioned by Engineering.

The rationale implemented to disposition the NCR's is sound, technically defensible and consistently applied. The technical merit of the disposition has been discussed with the management of Kemper (the Authorized Inspector of record) and Kemper has concurred with the reasonableness of the approach. The rationale engineering exercised in each disposition ensured the integrity of the weld by considering all data and its significance to the weld quality. In reviewing the dispositions as summarized in Table 1, the following conclusions may be drawn:

- ° It has been demonstrated, wherever possible, by subsequent radiography or post-certification test that the welders in question did have the ability to make sound welds in the thickness range or diameters involved. Post-certification testing was conducted without additional training. This meets the basic premise of Section IX performance qualification test (QW-301.1).
- ° All welds have passed the required NDE examinations (i.e., RT, PT, MT, UT, as applicable) and hydrotesting.
- ° Where welders were not available for post-certification and the weld could not be examined by RT, the weld has been reworked by grinding out the weld to the depth required to meet the welder's maximum qualified thickness limit. The weld was then given an intermediate PT inspection and rewelded using a welder certified for the thickness. In no instance was it evident that anything other than sound weld metal was removed, and all intermediate PT inspections also confirmed the soundness of the welds as deposited.
- ° The Project's confidence in the technical adequacy of the approach to clearly establish that all the welds in question are sound is further substantiated by the fact Section IX, by allowing qualification of welders using production welds in lieu of testing prior to welding, does not totally prohibit post-certification of welders.

There was no impropriety in the Quality Assurance (QA) acceptance of the corrective action to CAR C83-153N. This does not indicate a weakness in the QA ability to evaluate the appropriateness of a proposed corrective action. In this instance QA initiated, in addition to their own review, two Interoffice Memorandums to solicit review of technical experts within Bechtel to further evaluate the issues identified in the CAR. QA accepted the technical judgement of the technical experts on a technical issue.

The welder selection and verification program at Palo Verde is, as stated by the NRC inspector, "... appropriate and, based on past NRC inspection results, ordinarily functions properly and provides reasonable controls to ensure qualified welders are utilized to perform work." The project believes this is substantiated by the number of welds involved representing approximately 0.12% or less of all the ASME welds in each unit. The number of welders involved represents approximately 0.36% of the pipefitter welders qualified to Section IX at Palo Verde. These facts confirm there is no evidence the overall weld quality is in question, and further demonstrates that the quality program at Palo Verde is under control.

In the details of the inspection report, the NRC inspector expressed a concern that errors in welder selection may be more widespread than the problems identified at that time, based on the nonconformances identified by a project review of all N-5 Code Data Reports for Unit 1. The project has investigated this concern. The investigation disclosed that the review of N-5 Code Data Reports, which was being conducted per Special CIP 549.0, had been initiated after a problem was detected with the identification of wall thickness on weld documentation for reinforced fittings.

It became apparent that early in the project, welders were selected to weld reinforced fittings based on the thickness of the "run" pipe rather than the nominal thickness and diameter of the fittings. This occurred due to the lack of industry standards (ASTM, ANSI, ASME and etc.) to describe critical dimensions as there are for piping and standard fittings (design dimensions or nominal dimensions are apparently considered proprietary by reinforced fitting manufacturers). In October, 1981, the project began using approximate dimensions provided by Bonney Forge to identify weld thickness for welder selection.

The discovery of this situation has resulted in a 100% review of weld documentation in the Unit 1 N-5 packages to identify all possible problems in this unique area involving reinforced fittings. The review of the N-5 packages resulted in approximately twenty (20) NCR's being written. The NCR's have been reviewed individually and have been or will be dispositioned consistent with Table 1.

The project has investigated an NRC question raised on NCR WC-557 regarding one welder having completed 18 welds on Unit 3 for which he was not certified. These welds are made to specification CM-370 for the erection of liner plate. They are Quality Class "Q" welds to be made by an ASME qualified welder but they are "non-code" welds. The welder was qualified to AWS. He subsequently passed the ASME test and all 18 welds passed the required NDE. The welds were then dispositioned as acceptable using the criteria for nonconformance type 4 from Table 1.

Every instance of a welder completing a weld for which he is not certified and which is not identified in process is identified on a nonconformance report. Table 2 summarizes the total number of NCR's written due to welder's qualification problems. It also describes the disposition and identifies the NCR's resulting from the N-5 package review. The small number of welds and welders involved indicate that the system of selecting certified welders has been effective.

Additionally, to provide evidence that program controls are as sufficient in Non-Code welding, a randomly selected sample of Unit 3 containment liner plate welding was reviewed for welder qualifications. Liner plate was welded by welders certified to ASME qualified procedures but does not receive third party inspection. The welder's identification, as recorded on WR-5Bs, was mapped and therefore was available for review. Fifty-nine (59) welder qualification records (WR-1) were reviewed against the work performed. In all cases, the review revealed that the welders possessed applicable qualifications required for the welding performed.

CORRECTIVE STEPS TAKEN TO AVOID FURTHER NONCOMPLIANCE:

In response to Corrective Action Request (CAR) C83-153N, the program was formalized in November, 1983, to require that foreman select welders and Field Welding Engineers (FWE) verify the selection from the Welder Qualification Matrix.

Prior to this time it was a project practice for the foreman to use the matrix. It has, however, always been a Bechtel Quality Assurance Manual (BQAM) requirement for the FWE to assure welder qualification at the preparation of the WR-6 for rod issue. Additionally, the WPP/QCI's and the BQAM require the Welding Quality Control Engineers (QCE) to verify the welders qualification at fitup.

The remainder of Unit 1 ASME weld records are being reviewed for welder qualification. This review, conducted in accordance with Special CIP 565.0, will verify that the welder was certified to the appropriate procedure, including essential variables, for the welds he completed. Similarly, ASME weld records for Units 2 and 3 will also be reviewed for welder qualification.

In addition, a review of N-5 packages involving reinforced fittings will be performed for Units 2 and 3.

Finally, in an effort to assure correct work and prevent recurrence of welds performed by unqualified welders, Bechtel will conduct a series of training sessions with welders, weld foremen, Field Weld Engineers and Welding QC Engineers on the necessity and means for correct welder selection.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

The review of Unit 1 ASME weld records for welder qualification will be completed by October 1, 1984. The Special CIP for review of Unit 2 and 3 will be issued by July 20, 1984.

The Special CIP to review the N-5 packages for Units 2 and 3 will be issued by July 20, 1984.

The training sessions, described in the previous section, will be documented and completed by July 20, 1984.

TABLE 1

DISPOSITIONING OF WELDER QUALIFICATION NONCONFORMANCES

NONCONFORMANCE	WELDER AVAILABLE FOR RETEST (NOTE 1)	WELDER NOT AVAILABLE FOR RETEST
1. WELDED BEYOND MAXIMUM QUALIFIED THICKNESS	<ul style="list-style-type: none"> - POST QUALIFY PER QW-304.1 WELDS REQUIRING RT. - RETEST FOR THICKNESS (PROVIDED WELDER QUALIFIED FOR PROCESS) FOR WELDS <u>NOT</u> REQUIRING RT. 	<ul style="list-style-type: none"> - GRIND WELD DEPOSIT TO MAXIMUM QUALIFIED "T" - PT EXCAVATION - COMPLETE WELD WITH QUALIFIED WELDER. - INSPECT WELD TO ORIGINAL CODE REQUIREMENT.
2. WELDER NOT QUALIFIED FOR DIAMETER	<ul style="list-style-type: none"> - RETEST FOR DIAMETER. - INSPECT PRODUCTION WELD PER CODE REQUIREMENT. 	<ul style="list-style-type: none"> - REWORK <ul style="list-style-type: none"> o REMOVE ENTIRE WELD AND REWELD USING A QUALIFIED WELDER. o THE USE OF THE RT OPTION ON FIRST PRODUCTION WELD (QW-304.1) MAY BE UTILIZED IN LIEU OF REMOVING THE WELD AND REWELDING.
3. EXPIRATION OF QUALIFICATION	<ul style="list-style-type: none"> - POST QUALIFY PER QW-304.1. - PRODUCTION WELDS MUST MEET CODE REQUIRED NDE. 	
4. NOT QUALIFIED TO ASME SECTION IX	<ul style="list-style-type: none"> - POST QUALIFY TO ASME IX. REQUIREMENTS PROVIDED: - WELDER QUALIFIED FOR PROCESS BY OTHER CODES. 	
5. NOT QUALIFIED FOR P-NUMBER	<ul style="list-style-type: none"> - POST QUALIFY PER QW-304.1 - PRODUCTION WELDS MUST MEET CODE REQUIRED NDE 	
6. NOT QUALIFIED TO WELD BUTT WELDS	<ul style="list-style-type: none"> - POST QUALIFY TO ASME IX REQUIREMENTS. - PRODUCTION WELDS MUST MEET CODE NDE. 	
7. NOT QUALIFIED FOR PROCESS	<ul style="list-style-type: none"> - POST QUALIFY TO ASME IX REQUIREMENTS (NOTE 2) 	

NOTE 1: IN POST QUALIFICATION PER QW-304.1, RT OF WELDS NOT REQUIRING RT BY SECTION III (I.E., WELDOLETS, SOCKETS, HALF COUPLINGS) SHALL BE SURFACE EXAMINED. THESE WELDS DO NOT LEND THEMSELVES TO RT EXAMINATION. SPECIAL TECHNIQUES ARE REQUIRED BECAUSE OF THE JOINT CONFIGURATION AND ACCESSIBILITY. THE CODE RECOGNIZES THIS BY NOT REQUIRING THEM TO BE RADIOGRAPHED IN PRODUCTION.

NOTE 2: QW-322(A) PERMITS EXTENSION OF QUALIFICATION TO SIX MONTHS PROVIDED THE WELDER HAS WELDED WITH ANY PROCESS DURING THE LAPSED QUALIFICATION TIME PERIOD.

NOTE 3: SHOULD A NONCONFORMANCE OCCUR THAT IS NOT LISTED ABOVE, PROJECT/MQSS WILL DEVELOP DISPOSITIONING RATIONALE, AND THE NEW NONCONFORMANCE/RECOMMENDED DISPOSITION WILL BE ADDED TO THE SUMMARY.

NOTICE OF VIOLATION

- B. 10 CFR 50 Appendix B, Criterion V, as addressed in Section 17 of the FSAR states, in part: "... Instructions, procedures or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

Contrary to the above, PVNGS Station Manual Procedure Number 91HF-1RC01, Revision 9, "RCS Expansion Measurements" as modified by Test Change Notice (TCN) Number 2 specified inappropriate acceptance criteria for evaluating acceptable reactor vessel movement during testing in Unit 1.

The acceptance criteria specified in paragraph 2.4.5 was that the combined clearance for each lower reactor vessel horizontal support was to be greater than 0.030 inches. This criteria is inappropriate since it is based on a condition with the lower expansion plates (shims) installed. The lower expansion plates (shims) had not been installed (as authorized by TCN 2) resulting in a combined clearance of approximately seven inches.

This is a Severity Level IV Violation (Supplement II) applicable to Unit 1.

RESPONSE TO NOTICE OF VIOLATION

APS believes no violation of Criterion V of 10 CFR 50 Appendix B has occurred as a result of the described incident.

At the time 91HF-1RC01 was written, the acceptance criteria for the subject measurements was based on the expected plant configuration; i.e., with shims installed. Prior to the start of the test, the possibility of not receiving and installing the shims in time to support the HFT was recognized and Combustion Engineering (C-E) was consulted. C-E concurred with proceeding with HFT without shim installation if necessary.

During a review of the test results following the Hot Functional Testing, a test exception was noted and logged identifying the discrepancy described above. To resolve this exception the procedure was revised to delete the subject acceptance criteria. The obtained measurements were used to size the lower shims.

91HF-1RC01, RCS Expansion Measurements, remains in progress pending additional measurements to be taken during an upcoming Hot Pump Test.

Based on the above, the circumstances described in the Notice of Violation do not constitute a violation of 10 CFR 50 Appendix B Criterion V.

NOTICE OF VIOLATION

- C. Appendix B of 10 CFR 50, Criterion III, requires in part that the design bases "... are correctly translated into specifications, drawings, procedures, and instructions."

ASME Boiler and Pressure Vessel Code, Section III, Division 1, 1974 Edition (Winter 1975, Addendum), Subsection NB, paragraph NB-4711 specifies that thread engagement of threaded fasteners for mechanical joints on Class 1 components "... shall be engaged in accordance with the design."

Contrary to the above, design requirements for thread engagement were not specified in any of the licensee's specifications, drawings, procedures and instructions for threaded fasteners of mechanical joints for Class 1 piping and components at the time of the NRC inspection on April 9-20, 1984.

This is a Severity Level IV violation (Supplement II) applicable to Units 1, 2, and 3.

RESPONSE TO NOTICE OF VIOLATION

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND RESULTS ACHIEVED:

Specification Change Notice (SCN) 3706 to Specification 13-PM-204 was issued on April 19, 1984. This SCN provides thread engagement requirements for Class I piping systems which are identical to the existing thread engagement requirements for ASME Section III Class 2 and 3. Additionally, PCN 160 to WPP/QCI 202.0 was approved June 6, 1984, to identify the same requirements.

Valve 3P-SI-V235, which was discovered by the NRC inspector as having stud nuts with less than full thread engagement, was identified on APS Quality Assurance Corrective Action Report (CAR) C84-053D and Bechtel Nonconformance Report (NCR) PC-8259.

As an additional action, sessions with selected Field Engineers and Quality Control personnel have been conducted. The sessions have demonstrated that personnel are familiar with the criteria required for thread engagement of ASME Class 1 installations. These sessions have been documented on training records.

CORRECTIVE STEPS TAKEN TO AVOID FURTHER NONCOMPLIANCE:

The SCN and PCN issued to correct the deficiency is required reading by all appropriate Field Engineers and Quality Control Engineers. In addition, the thread engagement criteria will be incorporated into a Quality Talk session for all construction personnel's knowledge.

To determine if any significant problem exists due to the cited deficiency, a 10% random check of Unit 3 ASME Class 1 Borg-Warner supplied valves installed by Bechtel (as is the case of 3P-SI-V235) will be made as well as approximately two hundred-fifty (250) Q valves supplied by other vendors. The checks will determine if the scope of the problem is limited to this particular valve.

Additionally, on January 30, 1984, PCN 130 to WPP/QCI 202.0 Appendix IX was issued requiring the inspection for piping systems to verify that all visible vendor bolts, studs and nuts are present and intact.

Attachment A (Continued)
Page Ten

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Valve 3P-SI-V235 will be reworked, per the NCR disposition, by July 16, 1984.

The checks of the Unit 3 ASME Class 1 Borg-Warner valves will be completed by August 10, 1984 and documented on a QC Surveillance Report per QCI 2.4.

The Quality Talk Session for all personnel is scheduled for July, 1984.

NOTICE OF VIOLATION

- D. Appendix B of 10 CFR 50, Criterion V, states in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings ... and shall be accomplished in accordance with these instructions, procedures, or drawings."

Bechtel WPP/QCI 350.112-3 for Regenerative Heat Exchanger Installation, paragraph 4.2, states in part, "Upper expansion support is secured utilizing jam nuts and flat washers ... preassemble the connection with a flat washer and one (1) jam nut on each bolt. Alternately tighten each bolt hand tight. Back off each jam nut by 1/4 turn ... thread the outer jam nut over the bolt ... apply 100 + 5 in-lbs of torque to the outer jam nut while holding the inner jam nut in place...." Accomplishment of this step was verified by the Bechtel QC inspector as being complete on September 10, 1982 and so documented on WPP/QCI 350.112-3, paragraph 4.2

Contrary to the above, the Regenerative Heat Exchanger upper expansion support, drawing 13-C-ZCS-576, revealed that one of the outer jam nuts was loose and the inner jam nut was backed off about 1-1/2 turns.

This is a Severity Level IV violation (Supplement II) applicable to Unit 3.

RESPONSE TO NOTICE OF VIOLATION

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND RESULTS ACHIEVED:

A Bechtel field inspection was performed to the original installation requirements after the NRC inspection, and the results documented on NCR NC-1328. The disposition to this NCR will eliminate the outer jam nut and require the Hex Nut and bolt to be drilled out and have a stainless steel cotter pin installed.

Consideration was given to the possibility of a Field Engineer and Quality Control error at original installation. It was decided through a review of documentation related to the work and the past performance of the individuals involved, that the work was correctly accomplished. Due to the low torque value specified for the jam nut and the fact that the nut being jammed was set at one quarter turn back from a snug tight condition, the nuts could have become loose for any number of reasons after torquing was accomplished and accepted.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER NONCOMPLIANCE:

The repair described above for NCR NC-1328 has been previously implemented in Units 1 and 2. The Units 1 and 2 repair had been performed as a result of vendor errors encountered and the design was changed from the jam nut to a pinned nut. Since the problems did not relate to the jam nut coming loose and the same vendor error did not occur in Unit 3, the design change was not implemented in Unit 3.

To determine if the installation detail is unique, Engineering will review drawings supplied by the same vendor. Other similar bolting procedures will be evaluated for design changes.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Work per the disposition of the Unit 3 NCR will be complete by August 1, 1984. It is expected that full compliance will be achieved by August 10, 1984 after the review of drawings/procedures is completed.

NOTICE OF VIOLATION

- E. 10 CFR 50 Appendix B Criterion V, as addressed in Section 17 of the PSAR, states, in part: "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished with these instructions, procedures, or drawings...."

Bechtel Procedure WPP/QCI 5.0, "Nonconforming Materials Parts and Components" Revision 25, Paragraph 9.1 states "Nonconforming items shall be identified by "Hold Tags", marking or other clear means of identification".

Contrary to the above, during an inspection during the week of April 16-20, 1984 of the cable storage and issuing area, it was found that five reels of safety grade cable were stored in a quarantine area for nonconforming material without being identified by a "Hold Tag".

This is a Severity Level V Violation (Supplement II), applicable to Unit 3.

RESPONSE TO NOTICE OF VIOLATION

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND RESULTS ACHIEVED:

Only four (4) reels were observed in the "roped off" area. The Field Engineer who accompanied the NRC inspector was questioned and confirmed this information. The four (4) reels that were in the "roped off" area have been identified on NCR's EY-4378 and EY-4379. One Quality Class "Q" reel (NCR EU-4378) was dispositioned to reject the cable and scrap. Three Quality Class "R" spools (NRC EY-4379) were dispositioned rework and were returned to the vendor for repair or replacement. Any cable from the reels which was installed was inspected for conformance by the Field Engineer (Q, R, & S) and the Quality Control Engineer (Q) at installation.

A section of the reel yard has been cordoned off and signs placed at prominent locations indicating the area is for quarantined laydown. PCN 67 to WPP/QCI 254.0 has been issued to require reels found to be questionable to be placed in the quarantine area of the reel yard pending an engineering evaluation of nonconformance.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER NONCOMPLIANCE:

To confirm the integrity of the installed cable, available segments of both early and later installations will be inspected for the same characteristics reported on the above NCR's. Any deficiencies noted will be recorded on NCR's for dispositioning.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance will be achieved by July 20, 1984 upon completion of the inspection of the installed cables.

ATTACHMENT B

NOTICE OF DEVIATION

FSAR Table 5.2-1 states that reactor coolant boundary piping shall comply with the requirements of the ASME Boiler and Pressure Vessel Code, Section III, Division 1, 1974 Edition through Winter 1975 Addenda (Summer 1979 addenda for subsections NB-3650 through NB-3680).

The ASME Boiler and Pressure Vessel Code Section III, Division 1, Subsection NA-841j 1974 Edition through Winter 1975 requires that "A data report shall be filled out on Form N-5 by the installer and shall be signed by the installer and the inspector for each piping system (NA-1210) to be stamped with the Code NA symbol." The ASME Boiler and Pressure Vessel Committee Interpretation III-81-42, "Section III, Division 1, NA-8000, Piping System Overall Responsibility" states in part that in accordance with NA-1210, a piping system is a component and the Certificate Holder assuming responsibility for this component shall sign the N-5 Data Report. The N-5 Data Report Form found in Appendix V of the 1975 Summer Addenda to the Code provides space for either the NA Certificate holder or the Engineering Organization Certificate holder to sign for overall responsibility.

Contrary to this commitment, and as an example of many similar cases, the N-5 Data Report Form for piping system serial number IRC01-4, a component of the reactor coolant pressure boundary, had not been signed by either the NA Certificate holder or the Engineering Certificate holder as having accepted overall responsibility even though the N-5 package for the system had been filed as complete. Further, procedure WPP/QCI 26.4 Revision 4, "Preparation of N-5 Code Data Package" was found not to require a signature in the space provided on the N-5 Data Form for acceptance of overall reportability.

RESPONSE TO NOTICE OF DEVIATION

CORRECTIVE STEPS TAKEN:

PCN 10 to WPP/QCI 26.4 has been issued to require the signature of the Bechtel Field Construction Manager (or his designee) on N-5 Code Data Reports accepting overall responsibility for the systems covered by the N-5.

CORRECTIVE STEPS THAT ARE PLANNED:

All existing N-5 Code Data Reports will be signed by the Bechtel Field Construction Manager (or his designee) accepting overall responsibility for the system covered by the N-5 report. The problem resulted from Bechtel's misinterpretation of the N-5 signature requirements.

DATE WHEN CORRECTIVE ACTION WILL BE COMPLETED:

Full compliance was achieved on June 15, 1984, when all current N-5 Data Report Forms were signed by Bechtel accepting overall responsibility for covered systems.