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July 30, 1984 REGION V USE
ANPP-30068-TDS/TRB

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

Attention: Mr. T. W. Bishop, Director
Division of Resident
Reactor Projects and Engineering Programs

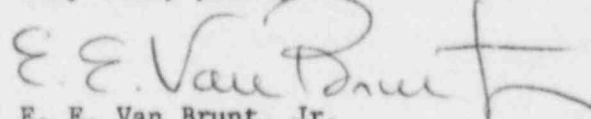
Subject: Final Report - DER 84-19
A 50.55(e) Reportable Condition Relating To Improperly
Installed Blind Flanges.
File: 84-019-026; D.4.33.2

Reference: A) Telephone Conversation between P. Narbut and T. Bradish on
April 3, 1984
B) ANPP-29384, dated April 30, 1984 (Interim Report)
C) ANPP-29774, dated June 19, 1984 (Time Extension)

Dear Sir:

Attached is our final written report of the deficiency referenced above,
which has been determined to be Not Reportable under the requirements of
10CFR50.55(e).

Very truly yours,



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

EEVB/TRB:db
Attachment

cc: See Page Two

Mr. T. W. Bishop
DER 84-19
Page Two

cc: Richard DeYoung, Director
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FINAL REPORT - DER 84-19
DEFICIENCY EVALUATION 50.55(e)
ARIZONA PUBLIC SERVICE COMPANY (APS)
PVNGS UNIT 1

I. Description of Deficiency

During pressure testing of Unit 1 piping systems by Startup, blind flanges were removed from piping and not properly tagged or marked. The cause of this condition is attributed to lack of specific procedural requirements covering items temporarily removed for testing purposes. This resulted in the following problems:

- A. A flange was removed without proper documentation (NCR PC-8058).
- B. A flange was not reinstalled at drain valve VM42, Line 1-CH-005-NOOT (NCR PC-8072, Item 4).
- C. Some flanges were reinstalled on the wrong pipes. This resulted in two nonconformities.
 - 1. Spool identification numbers on flanges did not conform to the piping isometric drawing (NCR PC-8072 Items 1 and 2).
 - 2. ASME Code Class requirements were violated. Class 2 flanges were installed on Class 1 pipe (NCRs PC-8030, PC-8033, and PC-8056).

These were all 1-inch, 2500 psi, blind flanges designed for installation on vent, drain and test connections.

II. Analysis of Safety Implications

The implication of substitution for Class 1 blind flanges is primarily one of appropriate documentation, since all flanges identified in the NCRs are from Material Specification BCAA (2500 psi) and only another flange of the same pressure rating will have the same bolt circle. The missing blind flange identified in I.B is not safety related since it serves only as a dirt cover for a normally closed drain valve.

Based on the above, this condition is evaluated as not reportable under the requirements of 10CFR50.55(e) and/or Part 21 since, if left uncorrected, it would not have impaired plant operations or have constituted a significant safety hazard.

III. Corrective Action

A. Remedial Corrective Action

To identify other possible deviations in those systems which have been transferred to Startup, Construction has prepared CIP No. 554.0 for ASME Section III Class 1 blind flanges on vent, drain and test connections. (Those systems not transferred to Startup were not subject to uncontrolled removal of blind flanges).

For each flange with incorrect spool identification, Construction will make one of the following fixes:

1. If the flange does not conform to the requirements of the Piping Material Classifications, it will be removed and replaced with a flange of the correct material and rating and all appropriate WPP/QCI procedures will be followed.
2. If the flange does conform to the Piping Material Classifications, it will be re-etched with the proper spool identification number.

The following documents have been issued to implement the above corrective actions:

- ° NCRs PC-8030 and PC-8033 were dispositioned to remove the Class II flange, reinstall the Class I flange, re-etch it with the correct spool number, and issue a CIP to document reinstallation.
- ° NCR PC-8056 was dispositioned to reinstall a blind flange of the correct material, re-etch with the correct spool number, and issue a CIP to document reinstallation.
- ° NCR PC-8058 was dispositioned to reinstall a 1" blind flange of QIA material, re-etched with correct spool number, and issue a Construction Inspection Plan (CIP) to document reinstallation.
- ° NCR PC-8072, Items 1 and 2 were dispositioned to issue a CIP to document reinstallation.
- ° NCR PC-8072, Item 3 was dispositioned to re-etch the pipe spool number on the newly located pipe spool.
- ° NCR PC-8072, Item 4 was dispositioned to reinstall the blind flange per NCR PC-8056 disposition.

B. Action to Preclude Recurrence

To address the root cause and to ensure that proper material control procedures and practices are implemented, Startup and Construction have issued and implemented procedures to more directly control materials.

Both organizations are currently reviewing and monitoring these procedures to ensure adequate material control requirements are implemented. Procedural changes and training is being conducted on an on-going basis to ensure proper control and implementation. The following items are specific to the problems identified by this DER:

- ° Startup has issued Procedure 90GA-OZZ10 (Startup Material Storage and Control Procedure) to provide for the identification, storage, and retrieval of components removed from their permanent location, plus the documentation required to maintain inventory and control of components removed from their permanent location. Also this procedure is being revised to require that Work Organizations shall return nonconsumable/expendable material/components/equipment to Startup Material Control. Startup Material Control is to sign for receipt of the item(s) and the item(s) will then be controlled in accordance with this procedure. This requirement is also being included in the procedures governing Startup Work Authorizations and Startup Field Reports (90GA-OZZ08 and 90GA-OZZ19).
- ° Bechtel Construction has added Appendix XI to Work Plan Procedures/Quality Control Instruction (WPP/QCI) 203.0 to assure appropriate documentation and control of flange removal and reinstallation. Additionally, WPP/QCI 12.0, Section 8.1 provides procedural requirements for use of material control tags on removed flanges.