



SMUD

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RJR 85-259

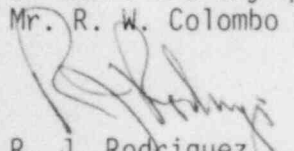
May 14, 1985

J B MARTIN, REGIONAL ADMINISTRATOR
REGION V OFFICE OF INSPECTION AND ENFORCEMENT
U S NUCLEAR REGULATORY COMMISSION
1450 MARIA LANE SUITE 210
WALNUT CREEK CA 94596

DOCKET NO. 50-312
LICENSE NO. DPR-54
SUBJECT: NOTICE OF VIOLATION FOR IE INSPECTION 85-02

The Sacramento Municipal Utility District hereby submits in Attachment 1 to this letter a response to the subject Notice of Violation in accordance with 10 CFR 2.201. Also, per your request, we have stated our assessment of the Weakness in Welder Certification Documentation concern in Attachment 2.

If there are any questions concerning this response, please contact Mr. R. W. Colombo at the Rancho Seco Nuclear Generating Station.


R. J. Rodriguez
Assistant General Manager,
Nuclear

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ATTACHMENT 1

DISTRICT RESPONSE TO IE INSPECTION 85-02
NOTICE OF VIOLATION

As a result of the inspection conducted between January 7 and March 1, 1985 by Mr. C. Myers, the following two (2) violations were identified. Each violation is followed by the District's response to the violation.

1. 10 CFR 50, Appendix 1B, Criterion V, 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."

Paragraph 3.4.2.2 of Rancho Seco Administrative Procedure AP.604 states, "The Tool Room will maintain a Daily Weld Rod Issue Log with the following information: (1) weld rod quantity issued and returned..."

Contrary to the above, on February 6, 1985, the Weld Rod Issue Logs were not being maintained on a daily basis to identify the quantity of bare wire filler material returned to the tool room. The Daily Weld Rod Issue Logs for several previous months (November, December and January) contained similar instances of incomplete log entries. As an additional example of this violation, no weld rod issue log entries were made on December 27, 1984, to control the disbursal of bare spool wire filler material which was used per Work Request No. 83892 for welding on safety-related equipment.

This is a repeat of the violation previously identified during an NRC inspection in July 1984 (Violation A, Appendix A, Inspection Report 50-312/84-14).

DISTRICT RESPONSE

The District has reviewed the findings described above and agrees with the issue as stated. Further investigation indicates that the corrective measures implemented following the July, 1984 Inspection Report addressed only part of the problem contributing to the incomplete Daily Weld Rod Issue Logs and were lacking in not providing clarification to the welders by specifying which weld materials were to be reported when destroyed. In effect, the corrective measures implemented following the July 1984 Inspection Report treated inadequate training of the tool room staff as the problem source when, in reality, the failure of the welders to inform the tool room staff of destroyed bare wire filler material was the major problem source. The welders failure to inform the tool room resulted from either (1) a misunderstanding that only coated electrode filler material was required to be reported when destroyed, or (2) the welders reluctance to take the steps necessary to inform the tool room of destroyed filler material.

Upon realization that the corrective measures initially implemented had not resolved the incomplete "quantity returned" Daily Weld Rod Issue Logs problem, an informal procedure was initiated whereby the tool room personnel would issue a memorandum to the Senior Mechanical Maintenance Engineer identifying any welders who failed to report the destruction of weld filler materials. He, in turn, passed this information on to the cognizant welding supervisor, who informed the welders of their responsibility to notify the tool room of any destroyed bare filler wire.

As a result of these memorandums, the percentage of incomplete bare wire entries decreased from 41% (79 incomplete entries out of a total of 193 logged) to 20% (60 of 305) in March to 2% (13 of 566) in April. It should also be noted that this improvement occurred during a period when the number of welders onsite approximately doubled.

Further action that will be taken by the District to resolve this concern includes:

- 1) The formalization of the procedure for the tool room staff to issue a memorandum whenever the "quantity returned" entry of the Daily Weld Rod Issue Logs is incomplete (to be included in AP.604, "Tool Room".)
- 2) The revision of Quality Control Instruction (QCI) -109, "Welding Filler Material Control", to require specifically that all unused welding and brazing filler materials (including bare and spool wire) be returned to the issuing storage area. AP.604 will also be revised to reflect this change.
- 3) The listing of qualified weld rod issue personnel by the QA Manager or his authorized designee.

The revised AP.604 and QCI-109 procedures and qualified weld rod issue personnel list will be implemented, and full compliance achieved, by June 1, 1985.

2. 10 CFR 50, Appendix B, Criterion V, states, in part, "Activities affecting quality shall be prescribed by documented instructions...of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions..."

Rancho Seco Quality Control Instruction QCI-114, Paragraph 6.5 states, in part, "A current status log/listing of welder qualifications will be maintained by Maintenance/Construction Engineering and submitted at least every 35 days to Quality Assurance in summary form, to be used for updating welder qualification records...The summary status shall contain...[the] process used...[and the] date [the] process was last used..."

Contrary to the above, the summary status listing (SMUD QA Form SW-1B) submitted to QA identifying qualification welding for four welders on December 27, 1984, per Work Request 83892 did not specifically identify the welding process used nor accurately document the date on which the process was last used.

DISTRICT RESPONSE

On December 3, 1984 the District's QA Department hired a registered Welding Engineer with 10 years of welding experience to oversee Rancho Seco's welding program and to ensure compliance with applicable design codes and regulatory guidelines. On December 27 the QA Welding Engineer issued Surveillance Report No. 177 identifying the violation described above.

Following the preliminary notice of this violation, Quality Assurance performed Surveillance No. 197 at the end of February 1985. This surveillance reviewed the welder recertification (updating) records for December 1984 and January 1985. For the forty-four welders on site, fourteen(14) recording discrepancies were noted. In all cases the discrepancies were minor and did not result in any welder losing his certification. As a follow-up to this surveillance, it was decided to reverify the process (i.e., SMAW, GTAW) competency of all on site welders qualified prior to January 1, 1985. Testing was performed during the week of March 11, 1985, witnessed by Quality Control and documented. QA follow-up Surveillance No.197A noted that of the 41 previously qualified welders that recertified, all proved to be competent in the use of GTAW and SMAW. Several brazers, however, had difficulty recertifying and as a result, QA issued a memo rescinding the brazing qualifications of eight brazers on March 15, 1985.

Along with this immediate recertification program, Quality Control Instruction (QCI)-114, "Welder Performance Specification" was revised and approved March 28, 1985. This revision included the requirement that, "during the last week of each three month period, all current welders on site shall be required to recertify for each process for which they are currently qualified." This change in the requalification period is in accordance with ASME Section IX paragraph QW-322. The revised procedure eliminates the need for Maintenance/Construction Engineering to provide QA with updated welder qualification records. The next scheduled site recertification will be conducted during the week of June 10, 1985. Full compliance has been achieved by the corrective actions described above.

ATTACHMENT 2

DISTRICT RESPONSE TO ITEM OF CONCERN NOTED

An area of concern identified by this inspection was the District's program for documenting welder certification. Based on information obtained from QA surveillance reports Nos. 177, 197, and 197A, we feel that noted deficiencies were the result of inadequate record keeping practices. There has been no indication of the deliberate abuse of the welder recertification program noted. Quality Assurance is continuing to investigate this concern. The results of this investigation will be brought to the attention of the District's Assistant General Manager for evaluation by June 15, 1985.