

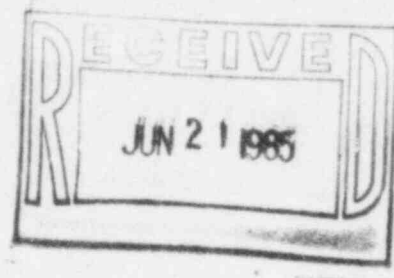


Nebraska Public Power District

GENERAL OFFICE
P.O. BOX 499, COLUMBUS, NEBRASKA 68501-0499
TELEPHONE (402) 564-8561

NLS8500136

June 12, 1985



Mr. E. H. Johnson, Chief
Reactor Project Branch 1
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive
Suite 1000
Arlington, Texas 76011

Dear Mr. Johnson:

Subject: NPPD Response to Notice of Violation and NRC Inspection
Report 50-298/85-12

This letter is written in response to your letter dated May 16, 1985, transmitting a Notice of Violation and Inspection Report 50-298/85-12. Therein you indicated that one of our activities was in violation of Nuclear Regulatory Commission requirements. The following is a description of the violation and our response in accordance with 10CFR2.201.

Statement of Violation

10CFR50.55a requires that the reactor coolant pressure boundary be constructed in accordance with the ASME III Code for Class I systems.

American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section III, NB5320, requires that indications observed in interpreting radiographic film are recorded and dispositioned. The proper disposition of linear indications that exceed code requirements is repair of the affected area.

Contrary to the above, an NRC review of radiographs during March 11-22, 1985, disclosed that inspected and accepted ASME Code Class I weld N2H contained unacceptable linear indications in the radiographs that were not recorded or dispositioned.

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

Corrective Steps Which Have Been Taken and the Results Achieved

Immediately following the March 11 through 22, 1985, inspection by the NRC to verify the adequacy of the IGSCC replacement piping welding program, the District issued a nonconformance report against the N2H, 270° safe end to nozzle weld. In addition, on March 20, 1985, the District issued

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correspondence to CBI advising of the NRC concern items and requested immediate corrective action to prevent reoccurrence of the NRC finding at the N2H, 270° nozzle.

A repair traveler to repair the area of concern on N2H, 270° safe end to nozzle weld was generated and sent to the field on March 24, 1985. The weld has been repaired with no unacceptable linear indications present.

Corrective Steps Which Will Be Taken to Avoid Further Violations

The District, to insure all future radiographs were properly read and interpreted on the reader sheet, placed one qualified District employee solely responsible for this activity. The District employee chosen, although not presently certified, had previously held Level II Certification for radiograph interpretation. Additionally, the District, on two different occasions during the IGSCC replacement piping welding process, obtained the services of outside consultants, highly qualified in radiograph interpretation, to provide an overview of the District's NDE program to verify its adequacy.

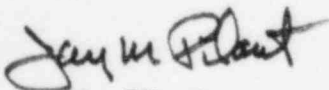
CBI, as a result of the NRC inspection, brought to the site a permanent Level III Radiograph Examiner to evaluate all future radiographs. This person was also made responsible to reevaluate and interpret all previous radiographs of the installed IGSCC replacement welds to verify compliance to the ASME Section III 1983 Code. The placement of the Level III radiographer at the site to review and final grade all film and assist CBI NDE personnel in improving their techniques, plus the steps taken by the District to insure the adequacy of its program as described by the preceding paragraph is, in the District's opinion, sufficient corrective action to avoid future violations of this nature.

Date When Full Compliance Will Be Achieved

Final acceptance of the radiographs and Radiographic Examination Report by the District was achieved on May 20, 1985. The District's Nonconformance Report generated to identify the situation found on the N2H safe end to nozzle weld by the NRC during their March 11 through 22, 1985, inspection was subsequently closed on May 28, 1985, signifying final correction of the nonconforming condition.

If you have any questions regarding this response, please contact me.

Sincerely,



J. M. Pilant
Technical Staff Manager
Nuclear Power Group

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