

None

REVISION 1
07/12/84

SSER

Task: Allegation A-20; A-21; A-22

Reference Number: 4-83-A-81/A1, A2, A3

Characterization: It is alleged that there were nine general areas of concern, thirty-six specific recordkeeping problems related to penetrations 38 (A-20) and 65 (A-21) (A-22), and similar recordkeeping problems with eight other penetrations. These problems included improper drawing changes, incorrect identification of some heat codes and welds, and improperly altered dates for some welds.

Assessment of Allegation: The nine general areas of concern were stated very generally, such as: Structural welding and bolting problems, hanger deficiencies, improper as-built drawings, and alteration of quality assurance (QA) documentation.

The allegation
The ~~allegor~~ did not provide sufficient, specific details to the NRC staff to allow further review. Other more specific allegations which related to the concerns in this allegation have been reviewed and assessed by the NRC staff. As a result, no further review was made of the nine areas of general concern.

The NRC staff reviewed 20 of the 36 recordkeeping problems related to penetrations 38 and 65, and found they had been corrected by Tompkins-Beckwith (T-B). A similar situation was found after the NRC staff reviewed one of the eight penetration documentation packages.

The NRC staff found that, prior to acceptance of the completed T-B records *Was this an NCR?* package, EBASCO had prepared closure of a document describing the deficiencies and corrective measures. The document listed all items to be reviewed and resolved by T-B before EBASCO would accept the package. This allegation was apparently based on language in the document before T-B had the opportunity to review the document and correct the deficiencies. The NRC staff found that T-B adequately completed the documentation packages for transfer to EBASCO. *All* the information needed to understand the work performed and to trace the material used was available within the packages. *The NRC staff found EBASCO and T-B recordkeeping to be adequate.*

ALTAUGH *no*
This allegation has ~~neither~~ safety significance ~~nor~~ generic implications.

Potential Violations: None.

for example?
Actions Required: LP&L shall revise Weld Control Record Sheet 6, Revision 1, as indicated in the response to Allegation No. 6 of Penetration 38 of this enclosure.

T & B procedure
QAI-9 - Quality Assurance Instruction 9, Revised & handling of construction - Installation records.

QAI 9.2 - Construction-Installation Records Deficiency Report.

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PDR ADDCK 05000382
E PDR

References

1. P38 Penetration
2. P65 Penetration
3. Bellows Test Connection A
4. Bellows Test Connection B
5. Bill of Material
6. BP Mill Test Report Check List
7. Camco Mill Test Report
8. Weld Control Record
9. TB Consumable Requisition A
10. TB Consumable Requisition B
11. TB Consumable Requisition C
12. TB Consumable Requisition D
13. TB Consumable Requisition E
14. Traveler Erection Sheet
15. Assoc Piping Production Traveler
16. EBASCO LTR ES-7131-83
17. Weld ID - P65
18. Weld ID - P65
19. Camco Mill Test Report
20. BP Material Test Report
21. PV-Nuc Steel Cor C
22. TB Consumable Requisition F
23. TB Consumable Requisition G

Statement Prepared By:

R. W. Hubbard

Date

Reviewed By:

Team Leader

Date

Reviewed By:

Site Team Leader(s)

Date

Approved By:

Task Management

Date

It appears that the actual problem was

1. Changing Info on the BOM without a traveler

2. Use of the words BP for traceability

3. Lost traceability of certain supplied information of a hole

ENCLOSURE

Allegation Evaluation of Penetrations 38 and 65

A number of penetrations were furnished by the metal containment installer which extend through the containment steel wall and concrete wall.

The NRC staff reviewed penetrations 38 and 65, as shown in penetration drawings. As indicated in the drawings, there is a weld (FW1) between the pipe enclosure and the containment steel wall penetration, as well as two attachment welds (FW2 and FW3) at the support ring which connects the bellows expansion assembly to the end of the metal sleeve through the concrete wall. Other penetration items are also attached by welding in the field.

I. Penetration 38

Record Package (Traveler) No. QMC-SI-P38

Isometric drawing (ISO) No. D-22949

1. Allegation

Sheet 2, Revision 4, of the isometric drawing has details that have been improperly erased/deleted.

Response

The details referred to in the allegation are the result of the addition and then deletion of two couplings and nipples for the bellows test connection.

FCR MP-1736 added the items as shown in Redline P500 on the isometric drawing. FCR MP-2342 deleted the couplings and nipples. The removal of the fittings resulted in ISO drawing D22949, Revision 4.

The drawing does not appear to be altered other than to accomplish the revision change.

No further action is required.

2. Allegation

Bill of Material Sheet 3, Revision 4, Item 3, S5 has an incorrect heat number entered. "BP" is a material manufacturer's initial for Bergen-Patterson and not a heat code or number. Also, Sheet 3, Revision 1, lists a different heat number for this same item - 810056. The heat log indicates this to be a PVN Steels Inc. (PVN) heat number. Other information in the related hanger traveler (SIRR-1246) indicates the material used was provided by BP and not PVN as indicated by Revision 1 of the Bill of Material (BM). Also the correct BP heat number is 26931. From the above information it is not clear which material was used.

Response

The allegation claims that an incorrect heat number "BP" is entered for Item 3 on BM Sheet 3, Revision 4. This heat identification has been removed from the BM and the space is now blank. This was done without revising the BM. Further investigation reveals that Item 3 was cut at the job site from a plate furnished by PVN.

Drawing SIRR-1246, Revision 2, Line 1 has the referencing heat number 810056, which is also shown on the PVN Certificate of Compliance dated March 2, 1981. Item 1 was shown on BP drawing SIRR-1246, Revision 2, but was not furnished by them.

No further action is required.

3. Allegation

BM Sheet 3, Revision 4, Item 4 also has "BP" listed as a heat number. This is incorrect, and the correct heat number, per a copy of Certified Material Test Record (CMTR) found in package, is F91512.

Response

Item 4 shown on BM Sheet 3, Revision 4 was furnished by BP as shown on their CMTR, Sheet 4 of 10, dated February 15, 1980. The heat number is F91512. Because the fabricated material was furnished by a subcontractor the heat number need not appear on the BM as long as it is shown on the CMTR. "BP" is no longer shown on the Item 4 line of BM Sheet 3. This space is empty. It was apparently removed without revising the BM.

No further action is required.

4. Allegation

BM Sheet 3, Revision 4, Item 5 has missing heat numbers.

Response

Revision 4 of the BM now shows a heat number of "UR" for Item 5. The material test report from Gulf Alloy, dated August 20, 1982, lists the item and the heat number. The heat number was apparently added to the BM without revising the BM.

No further action is required.

5. Allegation

Weld Record Sheet 6, Revision 0, Category "2/MC" (metal containment weld) is incorrect. FW3 weld is an AWS D1.1 weld, which is a tube track weld.

alleged exist
- Revision of BM ~~is~~ not traceable

Allegor said:
UR = unrequired
not a "heat number"

Allegor indicated:
- Traceability problem with Non-code
but safety-related
- CFC can provide traceability

Change being made with out revision

Response

The penetrations are a part of ASME code class MC and are correctly identified. Revision 1 to the weld record added welds FW4, FW5, FW6, and W7 which are safety category class 2 welds. The category shown on the weld record is correct.

The Weld Control Sheet 6, Revision 1, "Remarks Column," shows B31.1 as the governing welding piping code for welds FW2 and FW3. Although the FW2 weld is a D1.1 weld, both were done to Welding Procedure 1.4, which is a B31.1 procedure.

During the review for the preparation of the ASME N5 form on April 6, 1983, the "Remarks Column" was changed to show that both welds were to AWS D1.1, which is incorrect. The sheet should be revised to show the original B31.1 as the applicable code.

6. Allegation

On Sheet 6, Revision 1 of the weld record, welds FW4, FW5, FW6, and FW7 are shown as having filler material ER-303 using Weld Procedure 8.1. The rod withdrawal slip, however, shows E-308-16 filler material was used. The weld record was never changed to reflect the different filler metal.

Response

The statement made by the allegor appears to be correct. There is a discrepancy between the type of filler material used on welds FW4, FW5, FW6, and FW7, as shown on the weld control record and the T-B Electrode Requisitions 129350, 115187, 108881, 108856, and 108857.

The column "Filler Metal-Type" on Weld Control Record Sheet 6, Revision 1 should be revised to read:

| | |
|-----|----------------|
| FW4 | E-308/E-308-16 |
| FW5 | E-308/E308-16 |
| FW6 | E-308-16 |
| FW7 | E-308-16 |

Either process is acceptable.

7. Allegation

Weld Record Sheet 6, Revision 1, welds FW6 and FW7. The weld record contains "writeovers" on the fitup dates for FW6 and FW7, indicating that the fitup dates have been altered without proper authority or procedure.

Response

The fitup dates for welds FW6 and FW7 appear to be written over. The final visual inspection for both welds is shown as the next day and these dates are in their original form.

The ANI reviewed the sheet during the N5 review and initialed the dates. There is no reason to believe that the dates are incorrect.

No further action is necessary.

8. Allegation

Weld Record Sheet 6, Revision 0. The line under remarks incorrectly lists the procedure as B31.1; it should be AWS D1.1.

Response

See response to Allegation 5.

9. Allegation

The Traveler Erection Sheet 7 (records for identifying field assembling operations), Revision 2 is missing the authorized nuclear inspector (ANI) signature from ANI-established hold points on Erection Sheet Items 9 and 10.

Response

It was not necessary to sign off either line until work was completed. ANI initials were added to the sheet during the N5 review.

No further action is required. *This is not true. The ANI signed off at time of inspection.*

10. Allegation

The code data report is incomplete, no reference was made to the attachment ring, and this item also needs a CMTR.

Response

The attachment ring was purchased from Associated Piping & Engineering Corporation. Along with the bellows penetration, reference is made to the CMTR through Associated Piping Production Traveler as item No. CR150. The CMTR for this item is in Associated Piping's supplier's package.

This is not accurate. It is noted this ring is not associated piping + therefore the code information on the data report is not appropriate.

II. PENETRATION 65

1. Allegation

ISO DWG Sheet 2, Rev. 2 now has "Red-Lined" information added which is not covered by the latest Tompkins-Beckwith (T-B) and EBASCO revision stamps. This drawing should be marked "As-Built" not "Per Design" as presently marked.

Response

ISO DWG D-2299 is currently marked "As-Built," as approved by EBASCO Site Structural Engineer (ESSE) April 20, 1983. The red lined items 1, 2, and 3 were added per Field Change Request (FCR) No. FCR-MP1736 Rev. 0 and Rev. 1. No further action is required.

2. Allegation

The ISO Drawing bill of material is incomplete. See items 3, 9, and 10 on the traveler bill of material.

Response

Item 3 was added through FCR-MP292.
Item 9 was added through FCR-MP1944.
Item 10 was added through FCR-MP1944.

All three items are shown on BM Sheet 4A Rev. 1. No further action is required.

3. Allegation

ISO DWG Sheet 2, Rev. 5 indicates SA376 material was used for test connection pipes instead of SA312 called for on FCR-1736R1.

Response

EBASCO interoffice correspondence, dated April 6, 1983, indicates acceptability of substituting SA376 for SA312 on pipe.

The allegation has been corrected on Sheet 4A Rev. 1. See Allegation No. 4 above. No further action is required.

4. Allegation

The Weld ID sheet shows incorrect type of penetration for this package. This is a type II penetration.

*Violated FCR, used a letter for Design
Change purposes and the NRC accepted it?*

Response

Weld ID Sheet 4 Rev. 1 is used for identifying welds FW2 and FW3. The penetration configuration shown on this sheet is incorrect. Sheet 4A Rev. 1 now shows the correct penetration. No further action is required.

5. Allegation

The problem was not resolved at the time of EBASCO final review
Sheet 4, Rev. 1 - FW1. Weld ID Sheet shows an incorrect FW1 weld to be located on the process pipe. It is actually located on guard pipe per design drawings.

Response

The allegation has been corrected on Sheet 4A, Revision 1. See Allegation No. 4 above.

6. Allegation

NCR W3-2980 for filler metal heat #065150 and NCR W3-5721 should be listed on the package NCR index.

Response

Both NCRs were entered as closed on Erection Traveler Sheet 8, Rev. 1, which was signed by the ANI 4/27/83. No further action is required.

7. Allegation

Heat numbers are needed for 1/4" caps-threaded listed as Item 6 BM Sheet 3, Rev. 5.

Response

The BM now shows the heat number for the caps to be UR. No further action is required.

8. Allegation

BM Sheet 3, Rev. 5. Items 9 and 10 have heat numbers missing.

Response

The following heat numbers were added to the BM without revision. Item 9 was purchased from Standard Pipe and Supply. BM Sheet 3 Rev. 5 indicates heat #M2747. Item 10 lugs were cut from a plate furnished by PVN. The heat number shown on BM is #12746. No further action is required.

9. Allegation

Weld Control Sheet 6, Rev. 0 weld FW3 has a missing filler metal heat number.

Response

We weren't allowed to use these in our
Weld electrode requisition sheets 15133 and 14648 indicate the filler metal heat numbers used in welding FW3 as noted on Weld Control Sheet 6, Rev. 0. No further action is required. *Review*

10. Allegation

Weld Control Sheet 6 Rev. 0 lists the incorrect procedure. The procedure should be D1.1 rather than D31.1.

Response

Although FW3 weld is a D1.1 weld both FW2 and FW3 welds were done to Welding Procedure 1.4, which is a B31.1 Procedure. No further action is required.