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**Florida
Power**
CORPORATION

July 3, 1985
3F0785-06

Dr. J. Nelson Grace
Regional Administrator, Region II
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
101 Marietta Street N.W., Suite 2900
Atlanta, GA 30323

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
IE Inspection Report No. 85-17

Dear Sir:

Florida Power Corporation provides the attached as our response to the subject inspection report.

Sincerely,

Walter S. Wilgus
Vice President
Nuclear Operations

DGG/feb

Attachment

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FLORIDA POWER CORPORATION
RESPONSE
INSPECTION REPORT 85-17

VIOLATION 85-17-01

10 CFR 50, Appendix B, Criterion V, and Final Safety Analysis Report (FSAR) Section 1.7.1.5 require that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings... and shall be accomplished in accordance with these instructions, procedures, or drawings. Written instructions issued by the welding engineer required certain safety-related welds in the Make-Up System to be fabricated per Weld Procedure Specification WPS 8/8-TS, which requires the use of a combination of Tungsten Inert Gas and Shielded Metal Arc Welding techniques.

Contrary to this requirement, on April 18, 1985, the inspector determined that a total of 21 welds had been fabricated over a three-week period with the use of an unauthorized weld procedure. The work proceeded through this three-week period without QA/QC detection even though adherence to Weld Procedure Specification requirement is an inspection point requiring verification. The licensee issued a non-conforming operation report No. 85-58 on April 18, 1985.

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

RESPONSE

(1) FLORIDA POWER CORPORATION'S POSITION

Florida Power Corporation agrees with the stated violation.

(2) APPARENT CAUSE OF VIOLATION

An evaluation of this event indicated that the reason for the violation can be isolated to two causes. The first cause can be divided into two subordinate causes: (1) A miscommunication between the welding engineer and the welder discussing the acceptability of structural integrity of alternate welding processes. That discussion was misinterpreted as approval to deviate from prescribed instructions; and (2) A failure of responsible supervision to overview field work activities.

The second cause, involving the adequacy of the QA/QC program, was the result of a lack of adequate instructions to QC Inspectors to assure that essential parameters were implemented for welding processes. The intent of the inspection item was not clearly communicated and was subject to varied interpretation.

(3) CORRECTIVE ACTIONS

FPC is currently conducting a review of other safety-related system welds to assure that the processes were completed in accordance with specified requirements. The interim results of this review indicate that the welding concerns identified in this violation are not generic. However, these results are not final since some safety-related piping welds are still under review. The final results of this review will be documented as a supplement to this response. This review is scheduled to be completed by July 30, 1985. FPC conducted a review of existing administrative instructions governing work process control and field supervisor responsibilities. FPC believes that those procedures provide clear responsibilities to work area supervisors and specific direction to welders.

FPC also evaluated the welding that was conducted on the joints identified in the inspection report. The results of the evaluation found that the Tungsten Inert Gas (TIG) process used in lieu of the TIG/Shielded Metal Arc Welding (SMAW) process is acceptable. The work packages were revised to reflect the error and to document the acceptability of the process conducted.

Training was conducted for personnel on April 20, 1985, to assure the miscommunication was eliminated and strict adherence to established procedures is required.

The welding inspection plans have been revised to verify material to the welding process specified on the Welding Procedure Specification/Weld Data Sheet . This inspection will be completed prior to the beginning of each welding procedure, including combination welding processes.

(4) CORRECTIVE ACTION TO PREVENT RECURRENCE

Training will be conducted for QC inspectors to assure that the intent of the revised inspection plan is understood by all inspection personnel.

(5) DATE OF FULL COMPLIANCE

Full compliance will be achieved on July 30, 1985.