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U.S. NUCLEAR REGULATORY COMMISSION

ATTN: Document Control Desk
Mr. Greg Galleti (Greg.Galleti@ncr.gov)
WASHINGTON, D.C. 20555-0001

N/Ref: **OPR3- NRC- 2020-02**

Maliaño, February 5th, 2020

Asunto/Subject: **REPLY TO A NOTICE OF NONCONFORMANCE REPORT n° 99901379/2019-201**

REFERENCES: U.S. NRC Nonconformance report n°: 99901379/2019-201-01

Dear Sirs,

The enclosed report presents the Ensa explanation to the specific finding observed by the Multinational Design Evaluation Program (MDEP) inspection team, conducted at Ensa installations on October 21 through October 25, 2019.

Consistent to the instructions given, Ensa explanation concerning this finding related to control of special process, is documented in a Non Conformity Report (NCR). This NCR report includes the reason, proposal and written statement justifying the compliance with the proper inspection conditions during the special process carried out on October 25, 2019.

The corrective action to be implemented is addressed in the NCR report enclosed, Ensa will reinforce the Human Performance culture to avoid further recurrence in this kind of issue.

Please, do not hesitate to contact us for any clarification or additional information.

Best regards,

Susana SANTIDRIÁN
OPR3 Quality Assurance Engineer

Copy to:

Kerri A. Kavangh, Chief Quality Assurance and Vendor Inspection Branch Division of Reactor Oversight Office of Nuclear Reactor Regulation.

Attached: ENSA Report: NCR-2PR3/003 Rev.00 Non Conformity Report (35 pages).



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NRR

Attention:

U.S. Nuclear Regulatory Commission- Greg
Galletti
Greg.Galletti@nrc.gov

N/Ref: DGR- NRC- 2019-01

Maliaño, October 25th, 2019

Asunto/Subject: **Response to NCR Observation during Liquid Penetrant (PT) inspection in ENSA workshop.**

Dear Sir,

During the MDEP inspection performed by NRC/ASN/ONR during 21-25th of October 2019, it was raised the following comment about a non-destructive examination of liquid penetrant test inside the contract OPR3 – Pressurizers for Hinkley Point C:

“ENSA failed to assure that special processes were controlled and accomplished using qualified procedures in accordance with specifications and acceptance criteria. While performing liquid penetrant examination of the weld preparation of the backing plate for 2PR3-10A01 to the surge nozzle, the inspection team observed the ENSA Level II inspector was not aware that the weld preparation was under the part, and ENSA drawing OPR3, 19862 Revision 0 was not used as a reference to determine the area of examination. Specifically, the inspector did not review the ENSA drawing prior to commencing the inspection to determine the primary area to be inspected, and therefore the part was orientated such that the primary area was under the part. It is noted that the part was specifically moved to a table for ease of access for the inspection. As a result, the inspection results are indeterminate since the activities performed on the primary area are questionable under the existing conditions. The questionable activities include lighting, drying, penetrant application and removal, and developer application.”

ENSA would like to response this comment based on the following arguments:

1. Inspection requirements

The description of the non-destructive examination describe in the traveler IPP 2PR3- 10A01 Operation 3200 requires the liquid penetrant control of the backing plate (temporary attachment) welding edges before welding and the surface of the forging where the plate is

[illegible]

Fig. 1, Sketch of the drawing OPR3. 19862 rev 00.



2. Examination

2.1. Examination area

According to liquid penetrant test specification 0PR3CS401, the extend of examination is the weld plus 15mm in both faces (lower and upper part) of supporting backing plate.

Figure 1 shows the area to be welded in black and figure 2, in red is detailed the approx. final coverage of this weld, plus 15mm of adjacent base material in the temporary attachment.

To be conservative with this requirement and in accordance with ENSA NDT inspection good practice, qualified level 2 non-destructive inspector extended the examination area to avoid any misunderstanding about the coverage of the inspection. Therefore it was made the previous cleaning in the surface to be examined and adjacent area (within at least 25mm), and the coverage with the penetrant of all the surface to be welded (upper and lower) plus at least 15mm. (see figure 3). The same requirements are applied to all inspected.



Figure 3, Photo of the Backing plate during PT inspection.

2.2. Position of the part

The inspection was performed with the part positioned on a table as shown in the figure 3. There is enough accessibility to perform the complete inspection without perform any movement. It was done with the aid of a mirror to cover the lower area.

The inspection could be done in two positions or in two phases (turning the plate) fulfilling in all these possibilities the applicable documentation.

2.3. Illumination

During the examination an illumination of at least 500 lux was provided and checked (calibrated luxmeter) in the inspection surface. It was applied the shop artificial light plus a portable torch light.

2.4. Penetrant application

The penetrant application was done with a brush, penetration time (20min. minimum) was respected. After penetration time, penetrant removal was performed with cloths according to the applicable OPR3CS401 specification. Verification was done with the aid of a mirror to cover the lower area.

2.5. Drying

Drying in cleaning steps, both the previous cleaning and after excess penetrant removal, is checked with a clean and lint free white rag as defined in OPR3CS401 specification.

2.6. Developing and Evaluation


Developer was applied by spraying uniformly, covering all the inspection area after checking the drying of the piece. Verification was done with the aid of a mirror to cover the lower area.

CONCLUSIONS;

Taken into account all of the mentioned above **ENSA liquid penetrant inspection is conform with the requirements of the applicable specifications of the project OPR3.**

Please feel free to contact us if you have additional questions,

Best regards,



Antonio Cabeza Fernández
EN 9712 - NDT's level 3