

SEABROOK STATION
Engineering Office:
20 Turnpike Road
Westborough, MA 01581

October 4, 1979

SBN-100
T.F. B 4.2.7

U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

INSPECTION 50-443/79-06 & 50-444/79-06 Dated August 28, 1979

Gentlemen:

Pursuant to receipt of your correspondence regarding the results of the subject inspection we offer the following reply:

A. NRC Notice of Violation

10 CFR 50, Appendix B, Criterion V, states, in part, that: "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings. . . . and shall be accomplished in accordance with these instructions, drawings, and procedures. . . ."

The licensee's PSAR for Seabrook Station, Units 1 and 2, states, in part, in Paragraph 17.1.5: "Each organization is required to perform their respective quality related activities covered by this program in accordance with documented instructions, procedures, or drawings."

Paragraph II.C.1 of the United Engineers and Constructors Quality Control Procedure QCP-13, Revision 6, states, in part, ". . .to prevent unauthorized maintenance of stored items or removal of items from controlled storage areas, the resident construction manager and the field superintendent shall establish a list of personnel authorized access to level A, B, & C storage areas. . . ."

Contrary to the above, on May 22 and 23, 1979, personnel who were not on the authorized access list entered the warehouse where safety related equipment was stored in level A, B or C storage areas. They were not challenged at the entrances. This is an infraction applicable to Docket Nos. 50-443 and 50-444.

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Response:

Corrective Action Taken and Results Achieved

On May 24, 1979 a log-in and badge control program was implemented in our three warehouses. Signs have been posted in the warehouses directing all personnel who are entering warehouses to sign a log and have a badge issued to them. The badge is to be worn while in the warehouse and turned in when personnel sign out. Only authorized personnel are to be issued badges.

Personnel who must enter the warehouses and are not on the authorized access list must be accompanied by authorized personnel at all times.

Two self-locking locksets were installed on May 29, 1979, one in warehouse 1 north door and one in warehouse 2 south door. With the addition of these locksets all personnel must enter through warehouses 1 and 3.

Fencing has been installed in warehouse 1 which prevents access to the main warehouse and allows trucks to unload.

All warehouse personnel have been instructed to challenge anyone trying to enter the warehouses in any manner other than by the log system. Warehouse personnel have also been instructed that a man must be in attendance whenever any door is opened to allow loading or unloading of trucks. Inspection and surveillance results indicate that only authorized personnel are now entering Level A, B, and C storage areas.

Full compliance has been achieved as of September 13, 1979.

B. NRC Notice of Violation

10 CFR 50, Appendix B, Criterion V, states, in part, that: "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings. . . . and shall be accomplished in accordance with these instructions, drawings, and procedures. . . ."

The licensee's PSAR for Seabrook Station, Units 1 and 2, states, in part, in Paragraph 17.1.5: "Each organization is required to perform their respective quality related activities covered by this program in accordance with documented instructions, procedures, or drawings."

Paragraph 3.2 of the United Engineers and Constructors field general construction procedure, FGCP-2, Revision 4, states that "Each department head, supervisor and contractor who receives copies of documents (specifications, drawings, procedures and instructions) for distribution, shall be responsible for the control and accountability of these documents within his discipline."

Contrary to the above on May 23, 1979, Seabrook Station contractors had in their working files several drawings and a specification which had been previously superceded.

Response:

Corrective Action Taken and Results Achieved

Perini Power Constructors, the contractor identified during the inspection as the contractor having several drawings in their working files which had been superseded, has taken the following steps to assure positive corrective action.

1. A complete review of Perini controlled documents was made by the Perini Engineering Department of the 54,000 documents in their possession. This review, by seven members of the Perini engineering staff, commenced on July 31, 1979 and was completed September 5, 1979. Any item requiring correction was immediately rectified.
2. Perini has revised their Quality Assurance Procedure regarding document control to include sampling of documents in accordance with the guidelines of Mil-Std. 105D.
3. On August 27, 1979 the Perini Document Control Department was re-organized. Continued re-training and re-orientation of DCC personnel is included in this reorganization.

Continuing surveillance by the Construction Manager's QA/QC personnel and verification by the Owner's QA Group at the site indicates that compliance by Perini has been achieved as of September 10, 1979.

Pullman-Higgins, the contractor who had a superseded specification in their files, performed a review of all specifications in Pullman-Higgins possession on May 24, 1979. The review revealed that one other non-safety related specification of the 152 on file was of the wrong revision level. The superseded specifications were removed from the files and the proper revision level was inserted during this review.

Pullman-Higgins Document Control personnel were re-instructed in Document Control procedure requirements subsequent to a review of the procedure to assure its effectiveness.

Pullman-Higgins has generated a Document Control Surveillance Procedure and will perform surveillance of their Document Control operations on a formal basis upon approval of this procedure.

Yankee Atomic Electric Company (YAEC) has performed surveillance of Pullman-Higgins Document Control Program and has verified that full compliance has been achieved as of September 13, 1979.

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All other site contractors have demonstrated viable Document Control Programs and Procedures as evidenced by the results of audit and surveillance activities performed by the Construction Manager (UE&C) and/or YAEC QA personnel.

C. NRC Notice of Violation

10 CFR 50, Appendix B, Criterion V, states, in part, that: "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings. . . and shall be accomplished in accordance with these instructions, drawings, and procedures. . . ."

The licensee's PSAR for Seabrook Station, Units 1 and 2, states, in part, in Paragraph 17.1.5: "Each organization is required to perform their respective quality related activities covered by this program in accordance with documented instructions, procedures, or drawings."

Paragraph 3.0 of the Pullman Power Products Quality Program Procedure Section No. X, dated 5/16/78, states that "Inspection shall be performed by a QA Inspector to verify that the dimensional, material and quality requirements specified on the drawings or other documents have been attained."

Contrary to the above, on May 24, 1979, the visual inspection performed by the QA Inspector for service water field weld joint No. F0113 was not fully in accordance with the quality requirements specified in the Pullman Power Products Inspection Procedure X-9, Revision 2, in that inspections required to be performed prior to fit-up and tack welding were actually performed after fit-up and tack welding.

Corrective Action and Results Achieved

All Pullman-Higgins weld inspectors have been instructed not to sign-off for inspection steps not actually witnessed in the proper sequence.

The Inspection Steps identified as required by this notice of violation are not mandatory hold points and therefore sign off for these inspections (material identification and visual examination) should only be performed if actually witnessed. The first non-mandatory inspection point (material identification), however, could be performed in the fit-up and tacked condition.

Pullman-Higgins has revised their Inspection Procedure X-9 to more clearly delineate inspection requirements and verification points.

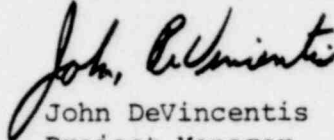
YAEC QA personnel have performed surveillance of welding activities and have substantiated that full compliance was achieved on July 10, 1979.

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YAEC QA will continue, through a system of audits and surveillance activities, to assure that positive corrective action has been taken.

Should you have any questions or comments regarding this response, we will be pleased to discuss them with you.

Very truly yours,


John DeVincentis
Project Manager

JDV:tla

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