

June 19, 1981

SBN-165
T.F. B4.2.7

United States Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Attention: Office of Inspection and Enforcement

Subject: Combined Inspection Nos. ⁵⁰~~40~~-443/81-05 and 50-444/81-05

Dear Sir:

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

NRC Notice of Violation (81-05-02)

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

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

United Engineers and Constructors (UE&C) Specification 9763-IS-1, Revision 6, in compliance with 10 CFR 50.55a, indicates that Class 2 piping of the Residual Heat Removal (RHR) system shall be examined in accordance with specific requirements of Section XI (article IWC) of the ASME Boiler and Pressure Vessel (B&PV) Code, 1974 edition with addenda thru Summer, 1975. Furthermore, Specification IS-1 states in paragraph 5.2 that: "The designer shall review the pipe hanger, supports, seismic and pipe whip restraints to assure that this hardware does not interfere with the (in-service inspection) access already provided. No permanently installed part of any of these attachments shall be closer than 15" to the nearest circumferential weld."

The Summer 1975 addenda to Section XI of the ASME B&PV Code specifies in article IWC-1120 (a) that exemption of components in certain systems from in-service examination requirements is based upon design pressure and temperature considerations.

Contrary to the above, as of April 20, 1981, a piping support for RHR line 158 was being installed in such a location as to interfere with in-service inspection access (closer than 15 inches) of two circumferential pipe welds requiring in-service examination. The UE&C design review for this support installation had exempted the line from examination based upon less conservative operating pressure and temperature considerations versus design pressure and temperature.

This is a Severity Level V Violation (Supplement II).

This violation was caused by a misinterpretation by UE&C of Yankee guidelines regarding in-service inspection requirements. These mis-interpretations have since been clarified.

UE&C has issued Engineering Change Authorization (ECA) No. 19/0205B which requires that the supports referenced in the ECA must be redesigned to provide adequate clearance for in-service inspection.

UE&C will review their document IS-1, "Design Guidelines for In-Service Inspection of Piping Systems" to incorporate the requirements published in the Federal Register on January 1, 1980.

Corrective action was achieved on April 27, 1981.

NRC Notice of Violation (81-05-01)

10CFR 50, Appendix B, Criterion IX states, in part that: "Measures shall be established to assure that special processes, including welding, ... are controlled and accomplished ... using qualified procedures in accordance with applicable codes, standards, specifications, criteria, and other special requirements."

The Seabrook Station PSAR, in paragraph 17.1.9, requires site constructors to control special processes in accordance with the applicable codes, standards, or specification criteria.

UE&C Specification 248-43, Revision 5, states in paragraph 2.2.9.5.1a. that: "Containment penetration sleeves are classified as parts of the containment liner (ASME B&PV Code, Division 2)."

The applicable edition (1975) of the ASME B&PV Code, Division 2, requires impact testing of the P-No. 1 base metal weld heat-affected zone for welding procedure qualification of production welding to carbon steel liner material with anominal section thickness greater than 5/8".

Contrary to the above, as of April 24, 1981, production welding was accomplished to a carbon steel containment penetration sleeve (X15) of 0.937" thickness using a Welding Procedure Specification (81-III-8/1-OB-12) not qualified by impact testing in the P-No. 1 base metal weld heat-affected zone and for which the specified maximum qualified thickness had been exceeded.

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


Pullman Power Products (PPP) issued a stop work order pending resolution of this violation. PPP proceeded to develop and qualify a welding procedure which included notch toughness testing. The procedure has been submitted to UE&C for review. In addition, those welds which were made using the procedure that had not included the notch toughness testing have been reported to UE&C for engineering analysis.

Contractors are being advised of the correct boundaries between ASME Division I and Division II areas.

Corrective action will be completed by June 19, 1981.

Very truly yours,

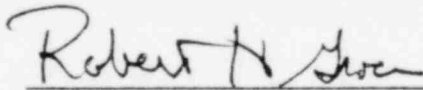
YANKEE ATOMIC ELECTRIC COMPANY


W. P. Johnson
Vice President

COMMONWEALTH OF MASSACHUSETTS)
)ss
MIDDLESEX COUNTY)

Then personally appeared before me, W. P. Johnson, who, being duly sworn, did state that he is a Vice President of Yankee Atomic Electric Company, that he is duly authorized to execute and file the foregoing request in the name and on the behalf of Yankee Atomic Electric Company, and that the statements therein are true to the best of his knowledge and belief.




Robert H. Groce Notary Public
My Commission Expires September 14, 1984