

May 19, 1982

SBN-276
T.F. B 4.2.7

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

Attention: Richard W. Starostecki, Director
Division of Resident and Project Inspection

References: (a) Construction Permits CPPR-135 and CPPR-136, Docket
Nos. 50-443 and 50-444
(b) USNRC Letter, dated April 19, 1982, "Combined Inspection
Nos. 50-443/82-02 and 50/444/82-02"

Subject: Response to Inspection Nos. 50-443/82-02; 50-444/82-02

Dear Sir:

In response to the violation, which you reported in Reference (b), PSNH offers the following:

NRC Notice of Violation: (443/82-02-02)

10 CFR 50, Appendix B, Criterion IX and the Seabrook Station PSAR require that special processes, including welding and non-destructive testing, be controlled using qualified procedures in accordance with applicable codes. The applicable editions of the ASME Boiler and Pressure Vessel Code, Sections III and IX, specify respectively (1) magnetic particle examination (MT) of weld edge preparation surfaces in material two inches thick or more and (2) welding procedure qualification for impact required material less than 5/8 inch thick, using a test coupon representing the minimum thickness to be welded.

Contrary to the above, as of March 19, 1982, welding had been accomplished on containment piping penetrations (sleeve to end-plate closure) with (1) MT not performed on the weld edge preparation of certain two-inch thick end-plates and (2) a welding procedure (IT12-III-1-OB-12) not qualified to the minimum thickness listed in its thickness range for impact required material.

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

Response:

Corrective Action Taken and Results Achieved

Due to the different provisions of ASME Codes, year and addenda, utilized as a basis for design, shop fabrication, and installation (i.e., the 1971 code for design, the 1974 code for shop fabrication, and the 1977 code for installation) inappropriate Nondestructive Examination (NDE) and impact test requirements for material and fabrication of the affected components were specified by the designer.

The design specifications and appropriate drawings are presently in the process of being revised to properly define the required code boundary limits and classification.

Impact tests will be performed as required by code and weld procedures are in the process of being properly qualified to the required code provisions.

Total corrective action is scheduled to be completed by July 15, 1982.

Notice of Violation: (443/82-02-04)

10 CFR 50, Appendix B, Criterion III and the Seabrook Station PSAR require that the appropriate quality standards be specified and the applicable design criteria be translated into drawings and procedures. The applicable editions of the ASME, Boiler & Pressure Vessel Code, Section III, Table XVII-2452.1-1 and AWS Code D1.1, Table 2.7 specify minimum fillet weld sizes for joining members.

Contrary to the above, as of February 26, 1982, the design criteria for fillet weld sizes specified on several UE&C Drawings (e.g.: F104038) governing pipe whip restraint installation were incorrect in detailing undersized welds with respect to either ASME, Section III or AWS requirements. Installation of certain pipe whip restraints (e.g.: PW-203-5) to incorrect weld criteria had been completed and accepted by quality control inspection personnel.

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

Response:

Corrective Action Taken and Results Achieved

As a result of this inspection, UE&C initiated an engineering review of all pipe whip restraint drawings and analysis. This review resulted in the following determinations:

- a) Fillet weld sizes were based on stress requirements only and AISC and ASME minimum weld size requirements had not been introduced.
- b) Forty-two undersize fillet welds had been specified in the design drawings. Thirty-seven configurations of pipe whip restraints are involved, from a total of one hundred and twelve pipe whip restraints.

The reinspection is expected to be completed by May 31, 1982.

W. P. Johnson
Vice President

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 Public Service Company of New Hampshire and that the statements therein are true to the best of his knowledge and belief.

Notary Public
August 5, 1988

