

YANKEE ATOMIC ELECTRIC COMPANY



SEABROOK STATION

Attachment 7.1
Revised: 9/6/83

CONSTRUCTION FIELD QUALITY ASSURANCE GROUP MASTER CHECK LIST

Title: RECEIVING INSPECTION OF UE&C
PURCHASED ITEMS

Number: QCP7-1

Parent Specification:
UE&C QCP 7-1

SAMPLE

REVISIONS

No.	Date	Prepared By	Approved By
1			
2			
3			
4			
5			
6			

Revision: 0

Franklin W. Bean
Prepared By: Franklin W. Bean

J.W. Singleton
Approved By: J.W. Singleton

Approval Date: 1-27-77

REFERENCED DOCUMENTS

Reference	Rev. &/or Date	Specific Section, par., etc.
A. UE&C QCP 7-1	R-1 9/1/76	N/A
B. UE&C FGCP-3	R-1 9/13/76	Para. 3.0, 6.0, and 7.0
C. ANSI N45.2.2	12/20/72	Sections 1, 2, and 5
D.		
E.		
F.		
G.		

REVISED: 9/6/83

FQCSA SUMMARY AND STATUS OF CORRECTIVE ACTION FOR SEABROOK - WESTSIDE CONSTRUCTION 12/22/75

ITEM NO.	DATE OF REPORT	REPORT WRITTEN BY	DISCREPANCY CODE	DEPT. CODE	ITEM OR SUBJECT REQUIRING CORRECTIVE ACTION	SENT TO LETTER RESPONDED	ITEM CORRECTED	STATUS
0055	02/10/1975	DEG MKP	03.03.01	M-6	NO PROCEDURE FOR DESIGN VERIFICATION ITEM 1.A.2	WEST, SB-2392 PMH-50	YES	DATE PROM 3/21/75 REF. NAM-539 AND SB-2555. C/O A/R 6/25-27/75.
0056	02/10/1975	DEG MKP	18.01.00	M-2	SCHEDULE FOR AUDIT OF RESIDENT QA REPRESENTATIVES ITEM 1.B	WEST, SB-2392 PMH-50	YES	DATE REQ 3/28/75 REF. NAM-539 AND SB-2555. C/O A/R 6/25-27/75.
0057	02/10/1975	DEG MKP	19.01.00	M-6	ILLEGIBLE DOCUMENTS APPROVED FOR MICROFILMING ITEM 1.C	WEST, SB-2392 PMH-50	YES	DATE REQ 3/28/75 REF. NAM-539 AND SB-2555. C/O A/R 6/25-27/75.
0058	02/10/1975	DEG MKP	05.04.02	M-7	OVERDUE UNRESOLVED ITEM FROM FORMAL DESIGN REVIEW ITEM 1.D	WEST, SB-2392 PMH-50	YES	DATE REQ 3/28/75 REF. NAM-539 AND SB-2555. C/O A/R 6/25-27/75.
0059	02/10/1975	DEG MKP	07.01.00	M-2	NO EVIDENCE OF QA REVIEW OF SELECTED PURCHASE ORDERS ITEM 1.E	WEST, SB-2392 PMH-50	YES	DATE REQ 3/28/75 REF. NAM-539 AND SB-2555. C/O A/R 6/25-27/75.
0060	06/25/1975	DEG MKP WJM	03.02.01	M-6	LACK OF PROCEDURE DESCRIBING INTERFACES ITEM A.1	WEST, SB-2874 PMH-50	NO	DATE REQ 8/10/75 REF. NAM-640 AND SB-3027. PROC DUE 12/31/75.
0061	06/25/1975	DEG MKP LJM	05.01.00	M-4	LACK OF PROCEDURE DESCRIBING INTERFACES ITEM A.2	WEST, SB-2874 PMH-50	NO	DATE REQ 8/10/75 REF. NAM-640 AND SB-3027. PROC DUE 12/31/75.
0062	06/25/1975	DEG MKP WJM	05.01.00	M-6	LACK OF PROCEDURE FOR CONTROL OF PROCUREMENT DOCUMENTS ITEM A.3	WEST, SB-2874 PMH-50	NO	DATE REQ 8/10/75 REF. NAM-640 AND SB-3027. PROC DUE 12/31/75.
0063	06/25/1975	DEG MKP WJM	05.01.00	M-2	LACK OF REVIEW OF AUDIT PROCEDURES AND CHECK LISTS ITEM B	WEST, SB-2874 PMH-50	YES	DATE REQ 8/10/75 REF. NAM-640 AND SB-3027. PROC DUE 12/31/75.
0064	06/25/1975	DEG MKP WJM	05.02.00	M-2	LACK OF REQUIRED SIGN-OFFS ITEM C	WEST, SB-2874 PMH-50	YES	DATE REQ 8/10/75 REF. NAM-640 AND SB-3027. PROC DUE 12/31/75.
0065	06/20/1975	DEG MKP WJM	03.01.04	M-4	LACK OF DOCUMENTATION OF VERIFICATION OF COMPUTER CODES ITEM D.1	WEST, SB-2874 PMH-50	YES	DATE REQ 8/10/75 REF. NAM-640 AND SB-3027. PROC DUE 12/31/75.
0066	06/25/1975	DEG MKP WJM	05.03.00	M-3	LACK OF DOCUMENTATION OF DESIGN REVIEW DELEGATION ITEM D.2	WEST, SB-2874 PMH-50	NO	DATE REQ 8/10/75 REF. NAM-640 AND SB-3027. PROC DUE 12/31/75.
0067	06/25/1975	DEG MKP WJM	05.01.00	M-3	LACK OF PROCEDURES FOR DESIGN ANALYSES ITEM D.3	WEST, SB-2874 PMH-50	YES	DATE REQ 8/10/75 REF. NAM-640 AND SB-3027. PROC DUE 12/31/75.
0068	06/25/1975	DEG MKP WJM	02.12.00	M-6	LACK OF IMPLEMENTATION OF TRAINING PROGRAM ITEM E	WEST, SB-2874 PMH-50	NO	DATE REQ 8/10/75 REF. NAM-640 AND SB-3027. PROC DUE 12/31/75.

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Check List No.: ANSI N45.2

Revision: 1

Date: 8/13/80

YAEC CFQA

MASTER CHECK LIST

LIST OF CHANGES

Section/Page	Change
I/5	Added Questions 2.17, 2.18, 2.19
II/All	Added References B & C
III/All	Added Reference D
IV/All	Added Reference E & F
V/All	Added Reference G

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MASTER CHECK LIST

INDEX

B

TITLE	IDENT.	File Location	R0	R1	R2	R3
Bedding & Backfilling	BBC-1	M 13.4.4	7/16/79			
Blasting Monitoring Program	BM-1	M 15.1.1	7/16/76	9/8/76	8/31/77	
Blast Monitoring Program Equipment Maintenance	BM-2	M 15.1.2	9/8/76	7/11/79		
Blast Monitoring Training Program	BM-3	M 15.1.3	9/8/76			
Requisition and Control of Weld Rod Material	Blouin FGCP-8	M 5.6.8	10/3/80			
Field Weld Procedure Spec. WPS-4	Blouin FGCP-12-2	M 5.6.11	10/2/80			

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FBM

Check List: OCP-403

Revision: 0

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Section II (Reference ...)

		Yes	No	N/A
1.	(3.15) For <u>joint cleaning</u> , are surfaces of the weld area thoroughly cleaned of all oxides, mill scale, cutting slag, grease, moisture and dirt injurious to welding? (Para. 5.13)	_____	_____	_____
2.	(3.19) Is galvanizing removed for a minimum of $\frac{1}{2}$ " in length of weld surface area? (Para. 5.13)	_____	_____	_____
3.	(3.20) Is paint removed for 2" either side of the weld? (Para. 5.13)	_____	_____	_____
4.	(3.22) When grinding contaminants from weld surface area is caution taken not to reduce base metal thickness? (Para. 5.13)	_____	_____	_____
5.	(3.28) Is <u>joint fit-up</u> of components during fabrication completed with the gap between weld joint areas kept to the minimum necessary to complete the fit-up? (Para. 5.16)	_____	_____	(0940) (0530) (FBM IR 05-152
6.	(3.29) Does the minimum gap between weld joint areas not exceed 3/16"? (Para. 5.16)	_____	_____	_____
7.	(3.30) Are fillet welds completed using the Electrode type designated in the applicable Welding Procedure Spec.? (Para. 5.17.A)	_____	_____	_____
8.	(8.50.2) Are completed welds examined and final visual inspected in accordance with AWS-D1.1, Section 6 and OCP-403? (Para. 5.23.B)	_____	_____	_____
9.	(3.51) Are weld joints not painted until the weld has been completed, inspected and accepted? (Para. 5.24.A)	_____	_____	_____

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Referenced Documents for Master Check Lists

Index

M 2.0

API - - - - - Appendix B to 10CFR50

Document	Revision and/or Date				Master Check List Nos.
M 2.1 <u>ACI STANDARDS</u>					
M 2.2 <u>ANSI STANDARDS</u>					
2.2.1 N 45.2	4/7/77				QA-6, QA-14, QA-15, QA-1 QA-12, QA-2-1, QCP-8 QCP-7-1, QCP-7-2 QCP-13-1, QCP-13-2 ANSI 45.2
2.2.2 N 45.2.1	1973				ANSI 45.2.1
2.2.3 N 45.2.2	12/20/72				QCP-7-1, QCP-7-2, QCP-13-1, QCP-13-2
2.2.4 N 45.2.3	3/15/73				QCP-13-1, QCP-13-3
2.2.5 N 45.2.4					
2.2.6 N 45.2.5					
2.2.7 N 45.2.6	1/25/73				TL-1, QA-2-2, QAS-1
2.2.8 N 45.2.9	6/6/74				QCP-17-1
2.2.9 N 45.2.11					
2.2.10 N 45.2.13	2/27/76				

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Referenced Documents for Master Check Lists

Index

M 2.0 API - - - - - Appendix B to 10CFR50

Document	Revision and/or Date			Master Check List Nos.
M 2.1 <u>ACI STANDARDS</u>				
M 2.2 <u>ANSI STANDARDS</u>				
2.2.1 N 45.2	4/7/77			QA-6, QA-14, QA-15, QA-1 QA-12, QA-2-1, QCP-8 QCP-7-1, QCP-7-2 QCP-13-1, QCP-13-2 ANSI 45.2
2.2.2 N 45.2.1	1973			ANSI 45.2.1
2.2.3 N 45.2.2	12/20/72			QCP-7-1, QCP-7-2, QCP-13-1, QCP-13-2
2.2.4 N 45.2.3	3/15/73			QCP-13-1, QCP-13-3
2.2.5 N 45.2.4				
2.2.6 N 45.2.5				
2.2.7 N 45.2.6	1/25/73			TL-1, QA-2-2, QAS-1
2.2.8 N 45.2.9	6/6/74			QCP-17-1
2.2.9 N 45.2.11				
2.2.10 N 45.2.13	2/27/76			

Attachment

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Request 2:

(excerpt from Item II of request of May 14, 1990) Please provide me a listing of records, pertaining to weld repairs performed on safety-related piping, that the Seabrook licensee is required to maintain pursuant to 10 CFR 50, Appendix B and other applicable NRC requirements.

Response 2:

The Code of Federal Regulations, in particular 10 CFR 50, Appendix B, does not delineate specific records which must be maintained relative to safety-related pipe welding or repair welding. Specific commitments in this regard are documented in the Seabrook Station Final Safety Analysis Report (FSAR) which indicates general compliance with USNRC Regulatory Guide 1.88, Revision 2. Regulatory Guide 1.88, titled "Collection, Storage, and Maintenance of Nuclear Power Plant Quality Assurance Records," endorses an American National Standard Institute (ANSI) standard (ANSI N45.2.9-1974) for quality assurance records associated with nuclear power plants. Additionally, the safety-related piping at Seabrook Station was generally installed in accordance with the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, 1977 edition through the Winter 1977 addenda. The ASME Code, Section III, Subsection NA, specifies general requirements for quality assurance records.

Specifically, with regard to welding and weld repair activities on the safety-related piping installed at Seabrook Station, the quality records must include the final results of the Code required nondestructive examinations (including final radiographs, where required); heat treatment records, where applicable; and the welding or weld repair process sheets, which provide traceability to other required QA records such as certified material test reports (CMTRs for the pipe material), welding filler metal material reports, the welding and weld repair procedures and their qualification records, and the welder qualification records. Additional quality records related to the above welding activities include nonconformance and deficiency reports, receipt inspection reports for vendor items, manufacturing records supplied by piping and pipe component vendors, and the ASME Code Data Reports for the overall ASME piping system and its components.

Some of the above record types are "nonpermanent" QA records, while others are "lifetime" records. These terms are defined and their criteria explained in ANSI N45.2.9-1974, with the recommended minimum retention periods for each type of document specified in Appendix A to the ANSI standard. It is also noted that, while the quality records pertaining to welding and weld repairs require retention, maintenance and retrievability for the periods specified, this does not imply that all of the records are available in the weld package for a specific weld. For example, a field weld process sheet documents the heat number of the weld filler material consumed and provides traceability to the pipe components being joined. The quality records for both of these items are maintained separate from the specific field weld package, but are still retrievable. These vendor records themselves may evidence traceability to yet other vendor records, with documentation of the fact that the design and procurement

requirements for the purchased material have been met. Traceability of component and material quality is thus maintained in the construction process, from manufacture through item installation.

In addition to the record types listed above as quality records related to pipe welding and weld repair activities, the ASME Code delineates certain record requirements for specific activities impacting code criteria. For example, for ASME Section III, Class 1 component weld repairs, the dimensions of the weld repair must be recorded where postweld heat treatment (PWHT) is waived in material that otherwise requires PWHT. In such a case, either the actual repair dimensions, or some other evidence that maximum allowable repair criteria are not exceeded, must be documented in a quality record to provide confirmation that any PWHT waiver was properly allowed in compliance with the ASME Code. Similarly, for Class 1 base metal repairs, the ASME Code specifies that a chart showing the location and size of the repair cavity be provided if the depth of the material repair exceeds certain limits. Such a chart would be a quality record. The above examples illustrate the point that the evidence of quality provided by the records can be different depending upon the Code requirements and the criteria supporting them.

In general, 10 CFR 50, Appendix B, Criterion XVII specifies that "sufficient records shall be maintained to furnish evidence of activities affecting quality." While certain documents, as discussed above, are considered quality records for retention in accordance with committed codes and standards, other documents, such as Weld Repair Orders, were not so prescribed. For such documents, the requirement to retain them was dependent upon judgement as to whether they provided supporting evidence of quality, as necessary for the prescribed QA records, e.g., nonconformance reports. Thus, while weld packages contain documents delineated to be quality records, they also may contain additional documents, not so prescribed, which relate to weld quality. As previously discussed, the weld packages also provide traceability to other quality records which are not part of the weld package.

Request 9:

(Provide) the staff's position concerning specific failings of the licensee, YAEC, and/or P-H to comply with Appendix B, particularly regard to compliance with Criteria II, V, VI, IX, XV, XVI, XVII, and XVIII.

Response:

As has been discussed in the NRC response, dated September 21, 1990, to the July 30, 1990 letter from Congressmen Dingell and Kostmayer regarding welding issues at Seabrook Station, 28 notices of violations related to piping, welding and NDE activities at Seabrook Station were issued by the NRC during the construction period from 1978 to 1986. Twenty-three of these violations were cited during the period 1980 to 1983, resulting in significant corrective action on the part of the licensee and resulting in improved performance, as reflected by both the declining number of enforcement actions and improved Systematic Assessment of Licensee Performance (SALP) ratings in this area.

With regard to the NRC Independent Review Team inspection of the adequacy of the welding and NDE programs at Seabrook Station, the following major findings and conclusions are summarized in the Executive Summary of NUREG-1425:

- P-H failed to identify and correct film and weld deficiencies until long after they occurred, violating NRC requirements and permitting the same mistakes to keep occurring. However, through the YAEC film overview program, the licensee did eventually resolve these problems by ensuring that the final welds and associated film met applicable code requirements.
- In some instances, records and procedural adherence-type problems of lesser safety significance may have violated NRC requirements during the construction period. These problems were investigated to the depth necessary to reach a conclusion regarding their safety significance.

One of the noted procedural adherence-type problems was reviewed by NRC Region I inspectors with the finding that certain construction procedures had not been followed. This issue was documented in Inspection Report 50-443/90-12 and classified as a severity level V, non-cited violation in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C, Section V.A). However, in evaluating the overall scope and conclusions of the NRC Independent Review Team effort at Seabrook Station, to include consideration of the types, significance, and age of the problems identified and the corrective actions implemented by the licensee, no notices of violation were cited or other enforcement actions taken as a result of the NUREG-1425 findings.

Furthermore, with regard to the unspecified failures to comply with eight of the eighteen criteria of Appendix B, referenced in the above request, a further explanation of the intent of 10 CFR 50, Appendix B, is warranted. The Introduction to Appendix B includes the following cogent points relative to its applicability:

(Request 9 Continued)

"Every applicant for a construction permit is required by the provisions of section 50.34 to include in its preliminary safety analysis report a description of the quality assurance program to be applied to the design, fabrication, construction, and testing of the structures systems, and components of the facility."

and

"As used in this appendix, quality assurance comprises all those planned and systematic actions necessary to provide adequate confidence that a structure, system, or component will perform satisfactorily in service."

As discussed in the NRC response, dated September 21, 1990, to an August 9, 1990 letter from five members of Congress regarding welding and NDE issues at Seabrook Station, the Final Safety Analysis Report (FSAR) provides a discussion, as required by 10 CFR 50.34, of how the applicable requirements of 10 CFR 50, Appendix B are satisfied. The YAEC program for quality assurance involved three control levels. As the QA program related to Pullman-Higgins pipe welding and NDE, Pullman-Higgins quality control personnel provided Level 1 QA functions, while YAEC provided the Level 2 (surveillance) and Level 3 (audit) overviews.

As noted in the Introduction to Appendix B, these multiple level of controls and quality overviews comprise the total Quality Assurance program. YAEC QA personnel in their surveillance and audits identified problems in the Pullman-Higgins radiographic review program and required corrective measures (e.g., adding an additional review by a RT Level III film reviewer) to be initiated. They further continued a licensee film review effort at a scope in excess of what would have been normally expected of a Level 2 surveillance activity. Such corrective action and licensee management attention is viewed as a QA program that is working as intended. Of course, if Pullman-Higgins QA Level 1 controls had been more effective, the YAEC QA Level 2 and 3 controls would not have needed to become so involved in the radiographic review effort. However, the fact that YAEC QA personnel did programmatically become involved is not evidence of general noncompliance with Appendix B, but rather the very intent of establishing quality assurance criteria, i.e., "to provide adequate confidence that a structure, system or component will perform satisfactorily in service."

Furthermore, NRC efforts like the Construction Appraisal Team (CAT) and NDE Van inspections, along with SALP evaluations, assessed the effectiveness of the YAEC QA program activities and the corrective action progress in the welding and NDE areas. As was noted earlier, significant improvements in project performance were noted in these areas from 1984 forward.

In summary, it is the NRC staff's position that specific failures to comply with 10 CFR 50, Appendix B, with regard to pipe welding/NDE were identified during construction and were cited, as documented in several inspection reports. The NRC Independent Review Team inspection resulted in the identification of some additional procedural adherence-type problems of lesser safety significance

(Request 9 Continued)

which were not cited. One of the factors considered by the NRC in the decision not to issue any new notices of violation was the effectiveness of the corrective action taken by the licensee. In general, such overall QA program effectiveness is the very intent of the quality assurance criteria embodied in 10 CFR 50, Appendix B.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
476 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406

Docket No. 50-443

FEB 22 1991

Public Service Company of New Hampshire
ATTN: Mr. Ted C. Feigenbaum
President and Chief Executive Officer
New Hampshire Yankee (NHY) Division
Post Office Box 300
Seabrook, New Hampshire 03874

Gentlemen:

Subject: Inspection Report 50-443/90-24

It has come to my attention that there are some minor errors in the subject inspection report sent to you on January 17, 1991.

The corrections are provided in the revised Section 8.2, attached. Corrected portions are marked by a vertical line in the right margin and do not change any conclusions in the report.

Thank you for your cooperation.

Sincerely,

Jon R. Johnson
Jon R. Johnson, Chief
Projects Branch No. 3
Division of Reactor Projects

As Stated

~~9103040034~~ 6pp

ENCLOSURE

8.2 Missing Radiographic Record

On December 27, 1990, the NRC senior resident inspector was informed by the licensee that radiographic films for one specific weld could not be found during a search of Chemical Volume and Control System (CS) welding records. The missing radiographs were related to Field Weld CS-328-F0204, located in a three-inch pipe line in the Primary Auxiliary Building. This piping is the common line for the seal injection return flow from the reactor coolant pumps and is categorized as ASME III, Class 2 piping, for which radiography is the specified final code acceptable method of nondestructive examination (NDE).

The licensee's search of the CS system welding records was conducted in response to a Congressional staff request for information and documents for approximately 70 CS field welds. Of the record sets being compiled, the only record problem identified to the NRC inspector was the missing radiographs for Field Weld CS-328-F0204.

The inspector was informed by licensee QA, engineering and welding personnel that the licensee believes that the subject radiographs were never turned over by the piping contractor, Pullman-Higgins, to Yankee Atomic Electric Company (YAEC) QA/NDE personnel for review and final vault storage. This position is supported by the microfilmed Radiographic Inspection Report (RIR) for this field weld. That RIR indicates that the radiograph was shot and accepted by Pullman-Higgins Level III review on August 17, 1982 and reviewed and approved by the Authorized Nuclear Inspector (ANI) on August 23, 1982. This RIR record provides no evidence of accomplishment, for this weld, of the YAEC practice of conducting an additional QA examination of all safety-related radiographs. The final, hard-copy RIR, which would have provided evidence of a YAEC review and would have been filed with the radiograph in the records vault, was likewise missing. Additionally, the index card filing system initiated by YAEC to identify the radiographs reviewed and stored with their RIRs in the vault provided no evidence that the film for Field Weld CS-328-F0204 had been received from Pullman-Higgins.

The QA records available for this weld indicate that a final radiograph was shot and interpreted, with the results documenting weld compliance with ASME III Code, Class 2 criteria. The microfilm RIR provides evidence of weld quality and is supported both by the field weld process sheet records, which were initialed and dated by the Pullman-Higgins Level III reviewer and the ANI, and by Revision 2 of Nonconformance Report NCR 2128, which documents a Pullman-Higgins QA engineer's verification on October 7, 1982 that the weld was acceptably repaired and re-radiographed. Additionally, other quality records indicate that Field Weld CS-328-F0204 was subjected to a volumetric ultrasonic testing (UT) inspection on January 31, 1986 and a liquid penetrant testing (LPT) examination on February 12, 1986. Both of these tests were conducted in accordance with ASME XI baseline inservice inspection provisions, in excess of the ASME III construction code requirements, and provided evidence of acceptable weld quality.

Therefore, while sufficient QA records are available to show weld quality in compliance with ASME code criteria, the radiographs for Field Weld CS-328-F0204, which the ASME code requires to be retained, are missing. Potential contributing factors include: (1) a piping

isometric drawing (ISO CS-328-02) error which mislabeled CS Field Weld 0204 as 0209 on August 3, 1982; and (2) an earlier revision to NCR 2128 which proposed a disposition to cut out and replace Field Weld 0204 instead of repairing it. While the drawing error noted in Revision 7 was corrected in Revision 13 on December 7, 1984 and the NCR disposition to replace the weld was subsequently changed to conduct a repair, uncertainty surrounding Field Weld CS-328-F0204 during the latter part of 1982 also may have contributed to failure of Pullman-Higgins to submit the final radiographs to YAEC.

The QA documents that were turned over for review and microfilming provided evidence that a final radiograph had been shot and approved, in accordance with ASME III code requirements. The fact that the radiographs were not retained as required needs further review by the licensee to determine if it is an isolated case. Additionally, since the YAEC NDE Review Group Procedure No. 5 specified (circa 1984) YAEC review of all safety-related radiographs, the missing radiographs may represent a licensee-identified violation of a construction QA procedure.

The inspector questioned licensee engineering personnel regarding the status of any determination as to the reportability of this identified problem to the NRC and was informed that an evaluation was in process. The licensee is also considering the documentation of this issue in a corrective action report (CAR) to provide a documented determination of the cause of the problem and assessment of corrective action from a generic standpoint. Additionally, record sampling, based upon some commonality with the subject weld (e.g., a search of other similar fourth repair cycle welds) may be pursued by the licensee. Also, the need to re-radiograph Field Weld CS-328-F0204 must be addressed. Since the existing weld quality is currently not in question based upon the available QA records, re-radiography can be delayed until the next refueling outage when the piping can be drained without impacting plant operation.

The inspector had no further questions regarding the licensee's analysis of this issue to date and no concerns regarding the existing weld quality or CS system operability. However, since the licensee evaluation is still ongoing, the results of their review will require further assessment. Such issues as reportability, generic applicability, corrective action implementation and radiographic record replacement need to be addressed. Additionally, the fact that a construction QA procedure may have been violated must be assessed for significance.

Pending licensee completion of their evaluation, implementation of all planned corrective measures, and further NRC review of safety and enforcement aspects, along with the schedule for re-radiography of Field weld CS-328-F0204, this item remains unresolved (90-24-02).