

# New Hampshire Yankee

ATTACHMENT 5

Ted C. Feigenbaum  
President and  
Chief Executive Officer

NYN- 91023

February 8, 1991

Mr. Leo J. Norton  
Assistant Inspector General For Investigations  
Office of Inspector General  
United States Nuclear Regulatory Commission  
Washington, DC 20555

References: (a) Facility Operating License No. NPF-86, Docket No. 50-443  
(b) NHY Letter NYN-91002 Dated January 11, 1991; Ted C. Feigenbaum to Leo J. Norton

Subject: Additional NHY Response To OIG Request For Information

Dear Mr. Norton:

The construction practice at Seabrook was to have designated Yankee Atomic Quality Assurance personnel perform, as a minimum, a 100% review of the Pullman-Higgins safety-related pipe weld final acceptance documentation, whenever on-site radiographic examination was the NDE process required to meet ASME piping code requirements.

Notwithstanding this practice, in the process of assembling documents in response to additional congressional staff requests, we have discovered that this review did not occur with respect to one specific weld; Field Weld CS-328-02-F0204. Also, the radiographs for this weld have not been located and are presumed to be lost or discarded.

Enclosed, for your information, are the Radiographic Inspection Report (RIR) and the Field Weld Process Sheet for this weld. Attached to the RIR is Corrective Action Request (CAR) No.91-001 (Rev. 1), which documents the current status of our determinations associated with this weld.

To briefly summarize, we believe that the final, hard-copy RIR and subject radiographs were never transmitted by the piping contractor, Pullman-Higgins, to Yankee Atomic Electric Company (YAEC) QA/NDE personnel for review and final vault storage. A microfilmed copy (versus hard-copy) of the RIR indicates that the final acceptance radiographs were shot and accepted by a Pullman-Higgins Level III review on August 17, 1982 and were further reviewed and accepted by the Authorized Nuclear Inspector (ANI) on August 23, 1982. Further evidence of weld compliance to the pertaining ASME III Code, Class 2 criteria is provided by the field weld process sheet records, which were initialed and dated by the Pullman-Higgins Level III reviewer and the ANI on the same dates as above, and by Revision 2 of Non-Conformance Report (NCR) 2128, which documented a Pullman-Higgins' disposition verification, on October 7, 1982, that the weld has been acceptably

9104040, 25 910372  
PDR COMMS NRCC  
CORRESPONDENCE PDR

New Hampshire Yankee Division of Public Service Company of New Hampshire  
P.O. Box 300 • Seabrook, NH 03874 • Telephone (603) 474-9521

United States Nuclear Regulatory Commission  
Attention: Mr. Leo J. Norton

February 8, 1991  
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repaired and radiographed. Additionally, other quality records indicate that Field Weld CS-328-02-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 requirements, and provide further evidence of acceptable weld quality.

From this and the enclosed documentation, you will see that the quality, functionality and operability of the weld are not in question. However, the history of this weld has two implications. First, the requirement for weld lifetime retention of the final acceptance radiography has not been met. In order to correct this, the weld will be re-radiographed before the end of the 1991 Seabrook refueling outage, the film will be reviewed in accordance with our present program requirements and the film will be placed in the records vault to complete the required quality document set. The second implication is that the YAEC practice of conducting an additional QA examination of all safety-related radiographs was, on this single occasion, not followed. As indicated in the CAR, investigation of the causes of this omission have led to the conclusion that this was an isolated occurrence with no discernable generic implications. Nonetheless, because it appears to be an exception to our previously unqualified proposition to you regarding the 100% YAEC review practice, we wanted to bring this specific occurrence to your attention.

The NRC Senior Resident Inspector has been apprised of the missing radiographs and our subsequent actions/determinations. Section 8.2 of NRC Inspection Report 50-443/90-24, issued January 17, 1991, pertains to this matter.

If you have any questions on the enclosed documents or this matter in general, please do not hesitate to call Neal A. Pillsbury at (603) 474-9521, Ext. 3341.

Very truly yours,

  
Ted C. Feigenbaum

TCF:NAP/bes/tad

Enclosure(s)

United States Nuclear Regulatory Commission  
Attention: Mr. Leo J. Norton

February 8, 1991  
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JOB 7035

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## MEMORANDUM

Subject ADDITIONAL VERIFICATION INFORMATION (CAR 91-001)

From D. L. Covill

Date February 8, 1991

To File

### Reference

As part of the verification process for CAR 91-001, a review was performed utilizing Pullman-Higgins Weld Repair Order (WRO) Log. This log is not a QA record. It contains information that was used to double check the results of the investigative action described on page 3, paragraph 8, of CAR 91-001 (Rev. 1). An additional "film on hand" verification was conducted by using P-H's WRO Log as follows:

P-H's WRO Log was reviewed for piping field welds (FWs) with three or more entries, along with piping FWs with the repair cycle noted as three or more.

This review denoted 137 field welds which required radiographic examination (RT). All 137 welds were verified to have YAEK-reviewed radiographic film on hand. This conservatively expands the corrective action detailed on page 4 of CAR 91-001, Rev. 1, beyond the CDT data base search.

Dennis L. Corvill

Dennis L. Covill



## CORRECTIVE ACTION REQUEST

Page 1 of 2

ICTS #QA11131

CAR No. 91-001 Rev. 1

1. Initiator Dennis L. Covill	Department NQG	Date 1/09/91	2. OQAP <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
3. Description of Condition Adverse to Quality A review of documentation for field weld 1-CS-328-02, F0204, revealed the radiographic film was missing. The field weld package contains all ASME Code required inspections and NDE and were found acceptable pursuant to the Code of construction. (Continued on Page 2)			4. Approved By <u>[Signature]</u> 1/24/91 Initiator's Supervisor Date
5. Responsible Manager R.E. White/J.J. Warnock		6. Date Response is Due 2/15/91	
7. Disposition (to correct the condition)  See Page 3			
8. Investigative Action (the cause of the condition)  See Page 3			
9. Corrective Action (to prevent recurrence)  See Page 3			
10 CFR 21 Review Required <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  If Yes, Manager of Engineering Notified _____ Date _____			
10. Date Corrective Action Will Be Completed <u>End of 1<sup>st</sup> Refueling Outage</u> Corrective Action Concurrence <u>Dennis L. Covill for J.J. Warnock</u> 1/24/91 Name & Title (Affected Department) NQG Date			
11. Corrective Action Approved By <u>[Signature]</u> 1/24/91 Name & Title Date			
12. Corrective Action Evaluation  Completed By <u>Dennis L. Covill for J.J. Warnock</u> 1/24/91 Nuclear Quality Manager Date			
13. Corrective Action Verification  _____ Nuclear Quality Manager Date			

cc: L.A. Gauthier (File 17.2.16.2)

Rev. 4 R.E. White  
J.J. Warnock

D.L. Covill

NEY Form 12720 A

Corrective Action Request (Continued)

3. Description of Condition Adverse to Quality (Continued):

The radiographic film is required by ASME Code and ANSI N45.2.9 for lifetime retention.

Additionally, there was no 3rd level overview done by YAEC QA of the radiographic film for this particular field weld. The YAEC FQA Manual Procedure #5 required YAEC QA perform a review of all safety related site generated radiographs during the construction phase.

NOTE: The CAR was revised to correct section 9 of the CAR which was improperly filled out by the initiator.

7. Disposition (to correct the condition)

Re-radiograph field weld 328-F0204 during the first refueling and perform third level review. Retain examination report and film in accordance with station approved procedures.

8. Investigative Action (Ref.: CEM-90-1001)

A design implementation document and quality record review of field weld 328-F0204 has been performed. Adequate documentation was found to establish that this weld received all code required inspections and NDE with acceptable results.

The subject film may have been inadvertently discarded prior to YAEC third level review. This most likely took place during a period when F0204 was incorrectly identified as F0209 on the construction isometric drawing. As noted in the referenced memo, F0204 was incorrectly deleted from the isometric subsequent to its acceptance (as F0204). Since the third repair NCR disposition required removal of the heat affected zone adjacent to the weld, the designer may have assumed that F0204 no longer exists. The correct weld number was later re-established on this drawing.

To determine if other radiographic film may have been discarded, the weld record of field welds having three or more repairs were reviewed (attached). Of those identified in the search, all had film and YAEC review completed. It is, therefore, concluded that there are no generic implications.

9. Corrective Action (to prevent recurrence)

The programs and procedures applicable during the period of time when construction documents were turned-over to NHY, and reviewed by YAEC QA, are no longer in effect. Additionally, since generic implications are not apparent, steps to prevent recurrence are not necessary.

A 10 CFR 21 review is not required for this condition. Field weld 328-F0204 is an integral part of the reactor coolant pressure boundary (RCP seal injection) and, therefore, constitutes a basic component. Since adequate documentation exists to establish that this weld received all code required inspections and NDE with acceptable results, a substantial safety hazard does not exist.



CORRECTIVE ACTION REQUEST  
CAR 91-001

1. A printout was obtained from a CDT data base search on the word 'repair' from the first 120 characters in the description field. This search denoted 203 NCR's from the population of 14,922 in the system.
2. NCR's with 3 or more repairs noted in the description field were reviewed for film on hand. As a result, 23 welds were reviewed. 2 welds of the 23 had been deleted. Of the 21 remaining welds, all had YABC reviewed film on hand.

NOTE: NCR's where the description was not revealing as to an obvious third repair were randomly reviewed and processed as above.

CEM-90-1001  
IMS# A16.06.33

SUBJECT RECORDS REVIEW - FIELD WELD FW/328-F0204

FROM R. E. White DATE December 27, 1990

TO W. Gagnon REFERENCE

Engineering was requested to independently evaluate the design implementation documents and quality records for field weld 328-FO204 in light of missing radiographic film. Based on this review, it was determined that all code required inspections and NDE were performed, and found acceptable. The Radiographic Inspection Report provides objective evidence that this examination was performed, and results found acceptable by a qualified Level 3 Inspector. Additionally, the Authorized Nuclear Inspector (ANI) has provided concurrence with these results.

### Discussion:

Field weld 328-W0204 is an ASME III, cl. 2 joint, located in the 3 inch common PCV seal water return, outside containment. This weld is identified on a construction isometric CS-328-02 and connects spool E2936-969 and E2936-970 on line 1-CS-328-2-2501-3.

After a third attempt at achieving a radiographic quality joint, NCR no. 2128 was initiated, per program requirements, for disposition by the Engineers. The rework, as stated in the NRBRE dated 7/19/82, was completed, and the 100% radiographic examination made on 8/17/82 accepted. Process sheets and Radiographic Inspection Reports are filed with the NCR in support of Disposition Verification which was completed on 10/7/82.

Some confusion may exist in review of the Construction Isometric history. Subsequent to completion of the final weld, and NCR close out verification, FW 328-F0204 was changed to F0209 on the isometric. It appears that, irrespective of the NCR close out status, the designer may have assigned the new weld number in preparing rev. 7 of the iso. because the PCR 2128 disposition required a complete weld cut-out (HAZ). The weld had, however, been previously accepted as F0204 and the effective iso revision (rev. 6) reflected this designation. The iso. was corrected on rev. 13 to properly identify this joint as F0204.

PEO279

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RECORDS REVIEW - FIELD WELD FW/328-F0204


All documentation for field weld 328-F0204 indicate that code required inspections and NDE, including radiography was performed and found acceptable by qualified personnel. Authorized Nuclear Inspector concurrence of the radiographic examination interpretations is indicated on the Radiographic Report. Therefore, there is no reason to believe that the quality of 328-F0204 is compromised by lack of the radiographic film.

The requirements of ANSI N45.2.9 and the ASME code are not, however, satisfied with respect to documentation required for lifetime retention. Both require radiographic records, as well as film, be retained for the life of the plant, and on that basis, radiographic inspection should be repeated at the earliest convenience.

Conclusion:

Adequate documentation exists to establish that 328-F0204 received all code required inspections and NDE with acceptable results.

The requirements of ANSI N45.2.9 and the ASME code include the retention of radiographic film as well as radiographic results for the lifetime of the plant. Radiographic inspection should, therefore, be repeated at the earliest convenience if the subject film cannot be found.

  
R. E. White  
Plant Engineering Manager

REW/RRC:mce

cc:	R. J. DeLoach	01/40
	J. M. Varga	01/62
	R. Bergeron	01/62
	C. W. Roberts	01/62
	L. W. Rau	01/62
	G. Tsouderos	Bolton
	R. R. Cliche	01/62
	DCC	02/06

WELD PROCESS SHEET

Job No. 7035 Cust. Public Service Co.

Welding No. 05-328-02 R/L

Weld No. 60204

Code ASME III Class 2

Thk. 3" Insert 1/38 R/L

Wire 24-III-B-KI-12 Electrode E308

Preheat Range 50° F Min. 350° F Max.

Interpass Temp 350° F

Weld Temp N/A

Weld Time Hrs. N/A

Weld Rate F/hr. N/A

Weld Rate F/hr. N/A

Joint: Circumferential

Purge Dam: REMOVABLE

Access Weld YES (NO)

Prepared By: B. G. G. Date: 8-11-82

Approved: B. G. G. Date: 8-11-82

Reviewed: B. G. G. Date: 8-11-82

Weld Record Tick 58

Order (S) Symbol - Root 58 Final 58

Insert/Backing Ring HT. No. 42377316

Electrode Lot No(s) 17616 (-A42377316)

Lot Chart No. 04377770

Final Check Date: 8-11-82

Inspector Code FX-52

Record Type 41-5-01-006 R/P-30-43

Index Number

LOCATION: PAB ZONES: 328-328-28B

Op. No.	OPERATION	Proc. No.	HOLD ANI	HOLD P.P.T.	Ins. and Date	Ins. Date
1	Material Description SPOOL TO SPOOL PC. MARK OR HT. NO. E7936-970 TO E7936-969	N/A				8-12-82
2	VISUAL INSPECTION	REV 6 X-2				8-12-82
3	FIT UP AND TACK	REV 4 24-III-B-KI-12				8-12-82
4	PREHEAT	REV 4 24-III-B-KI-12				8-12-82
5	ROOT PASS WELD	REV 4 24-III-B-KI-12				8-12-82
6	VISUAL INSPECT ROOT	REV 6 X-9				8-12-82
7	RADIOGRAPH ROOT	N/A				8-12-82
8	WELD OUT	REV 4 24-III-B-KI-12				8-12-82
9	INTERPASS TEMP	REV 4 24-III-B-KI-12				8-12-82
10	PREPARE SURFACE FOR EXAM.	REV 5 X-BT-1477				8-12-82
11	VISUAL INSPECT FINAL WELD	REV 6 X-9				8-12-82
12	REMOVE PURGE DAM	REV 5 X-29				8-12-82
13	MAGNETIC PARTICLE 100% LIQUID PENETRANT 100%	REV 3 X-BT-1477				8-12-82
14	RADIOGRAPH 100%	REV 5 X-BT-1477				8-12-82
15	POST WELD HEAT TREAT	N/A				8-12-82
16	P.T. or M.T. 100% Weld and/or Thermocouple Tack Weld	N/A				8-12-82
17	RADIOGRAPH 100%	N/A				8-12-82
18						8-12-82

## EXAMINATION

PRIOR TO WELDING - Para. 6.4

Physical Integrity of Component  
 Welder Qualified for Joint  
 Verify Material Marking  
 Items to be Welded -  
 Adequately Supported  
 Joint Design  
 Cleanliness

1. Weld Prep ✓
2. Internal Surface ✓
3. External ✓

## Fit-Up

Mismatch  
 Concentric  
 Eccentric  
 Cold Spring  
 Tack Welds  
 Alignment  
 Purge Gas Satisfactory  
 Pre-Heat  
 Socket End Cap  
 Scribe Mark Verified

PAGE 1  
 - Acceptable N/A=Not Applicable  
 X = Not Acceptable N/W=Not Witnessed

✓ - 3 POOLS DRY FILL AT VISUAL

✓  
 ✓  
 ✓  
 ✓  
 } JPM 8-12-82

✓  
 ✓  
 ✓  
 ✓  
 JPM 8-12-82

INSPECTOR DATE  
 - HILLO GUAGE G.H.L. GUAGE CO.

✓  
 N/A  
 ✓  
 ✓  
 ✓  
 ✓  
 - 3 = KMO 536 DUE 11-6-82  
 + 50°F

N/A

## EXAMINATION

DURING WELDING Para. 6.5

Status

External Surface  
 (Root)

Internal Surface  
 (If Accessible)

Inter-Pass Temp.

✓  
 ✓  
 ✓

JPM 8-12-82  
 INSPECTOR DATE

THRU WINDOW

## EXAMINATION

AFTER WELDING - Para. 6.5

Internal Surface  
 If Accessible

Status

Oxidation  
 Concavity  
 Convexity  
 Undercut  
 Unconsumed Insert

N/A  
 ✓  
 ✓  
 ✓  
 ✓

JPM 8-13-82  
 INSPECTOR DATE

External Surfaces  
 (Weld & Heat Affected Zone)

Reinforcement Corrosion  
 (Height & Width)

Free from Arc Strikes  
 And Weld Splatter

Transition Between  
 Different Diameters

Undercut  
 Suitability for NDE

Joint & Welder Ident.

Removal of Temp. Attachments

Purge Dam Removal

✓  
 ✓  
 ✓  
 ✓  
 ✓  
 ✓  
 ✓  
 ✓

JPM 8-13-82  
 INSPECTOR DATE

1-C.5-32302  
 F0204





UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION I  
475 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:

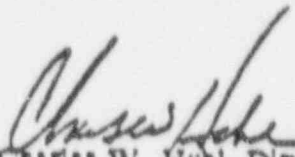
Subject: Request for Information on Radiograph Records

The purpose of this letter is to confirm our request that New Hampshire Yankee provide the following information to the NRC in writing.

- The number of Pullman-Higgins weld radiographs retrieved from the files incident to post-construction follow-up on weld adequacy questions, and the number of Pullman-Higgins weld radiographs which were not retrievable during this effort.
- The number of Pullman-Higgins weld radiographs which should be on file.
- The technical basis for your conclusion that the missing radiograph for Field Weld CS-328-F0204 is an isolated occurrence with no discernable generic implications (reference your letter NYN-91023 to NRC (OIG) dated February 8, 1991).

Thank you for your prompt attention to this matter.

Sincerely,

  
Charles W. Hehl, Director  
Division of Reactor Projects

9103060322

Public Service Company of  
New Hampshire

2

FEB 22 1991

cc:

L. E. Maglathlin, Jr., President and Chief Executive Officer, PSNH  
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