

New Hampshire
Yankee

Ted C. Feigenbaum
President and
Chief Executive Officer

NYN-91020

February 26, 1991

Mr. Thomas T. Martin
Regional Administrator
United States Nuclear Regulatory Commission
Region 1
475 Alleendale Road
King of Prussia, PA 19406

- References: (a) Facility Operating License No. NPP-86, Docket No. 50-443
- (b) USNRC Region 1 Letter dated February 22, 1991, "Request for Information on Radiograph Records" C. W. Hehl to T. C. Feigenbaum
- (c) NHY Letter NYN-91023, dated February 8, 1991, "Additional NHY Response to OIO Request for Information", T. C. Feigenbaum to L. J. Norton

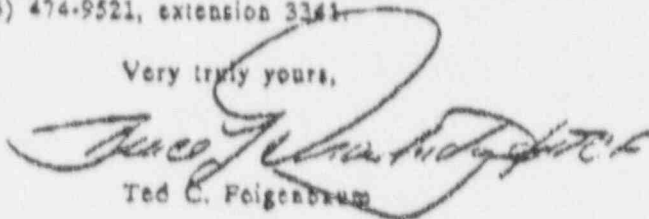
Subject: Response to Request for Information

Gentlemen:

Enclosed please find New Hampshire Yankees' response to the information requested in USNRC letter dated February 22, 1991 [Reference (b)].

Should you have any questions regarding this matter please contact Mr. Neal A. Pillsbury, Director of Quality Programs at (603) 474-9521, extension 3341.

Very truly yours,



Ted C. Feigenbaum

TCP:ALL/tad

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United States Nuclear Regulatory Commission
Attention: Mr. Thomas T. Martin

February 26, 1991
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New Hampshire Yankee
February 26, 1991

ENCLOSURE 1 TO NYN-91029

Request No. 1

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.

Response

- A. There have been 1174 occasions where P-H weld radiographic film packages have been retrieved from the NHY storage vault incident to post-construction follow-up on weld adequacy questions. Since certain packages were retrieved on multiple occasions, it has been determined that at least 920 separate and distinct radiographic packages have been retrieved and subsequently verified as a result of this effort.

These numbers were determined as follows:

NUREG 1425 (includes Wampler log).	276
Corrective actions performed as described in NHY CAR 91-001.	157
Congressional inquiries (estimated to be 300) requesting Weld Process Sheets and Radiographic Inspection Reports through the NRC.	76 (See Note 1)
Additionally, NHY has arbitrarily selected, from P-H 'Records Receiving Check Lists', a number of weld records for the years 1981 through 1984. These were the years of most interest to the congressional inquiries as these years were prior to YAEC formally specifying their 100% film review in a written procedure. As of 2/22/91, the weld radiographs for these pipe welds were verified to be in the NHY records vault with proper evidence of YAEC review.	<u>665</u>
Total	1174 (See Note 2)

Note: 1. The number 300 was not used in this calculation because not all documented congressional inquiries are available to NHY, and a number of these requests were redundant. NHY believes that 76 conservatively understates the actual number.

Note: 2. The number of radiograph package retrievals (1174), include many duplicate reviews of the same packages. NHY has further cross checked the weld numbers included in this set of 1174 and has determined that there are at least 920 separate and distinct radiographic packages within this population of 1174 radiographic film set verifications.

- B. One (1) is the number of Pullman-Higgins Field weld radiograph sets not found to be retrievable during these efforts. P-H radiographs for P-H weld number CS 328-02-P0204 were not located during the document research phase of an on-going congressional inquiry. NHY wrote CAR 91-001 to document and resolve this occurrence. CAR 91-001 was enclosed in Reference (c).

C. Also not included in these numbers are extensive NRC independent verification inspections such as:

Construction Appraisal Team Report (CAT) 82-06 which reviewed 29 P-H welds,

CAT 84-07 which reviewed 180 P-H welds, and

YAN 85-19 which reviewed 79 P-H welds.

The above and many other NRC inspections were not "post-construction" retrievals and therefore were not included in our tabulation.

Request No. 2

The number of Pullman-Higgins weld radiographs which should be on file.

Response

The total number of radiograph sets which should be on file is the number of NHY records in the vault (4177), plus the one missing radiograph set for CS-328-02-P0204, plus any additional radiograph sets which should be in the file but are not. NHY believes that the number of radiograph sets in this latter category is zero based on the generic implications review discussed in the response to Request No. 3 below.

It is believed that the number of radiograph sets should be 4178 in order to meet the applicable ASME Code and P-H contractual commitments for Seabrook Station. This number can also be derived from the information which was previously provided to the NRC and then subsequently summarized in the table on page 14-2 in the NRC's NUREG-1425 ("Welding and Nondestructive Examination Issues at Seabrook Nuclear Station").

An empirical verification of this number would require a review of all as-built isometric drawings of record. NHY believes that this type of verification would be both time consuming and unnecessary based on the results of the extensive independent verifications conducted to date.

Request No. 3

The technical basis for your conclusion that the missing radiograph for Field Weld CS-328-02-P0204 is an isolated occurrence with no discernable generic implications (reference your letter NYN-91023 to NRC (OIG) dated February 8, 1991).

Response

NHY is confident that the single known instance of a missing radiograph set, for CS-328-02-P0204, is an isolated occurrence with no discernable generic implications based on the generic implications review described in CAR 91-001 [enclosed in Reference (c)] and the unique circumstances involved with this one radiograph set.

As part of the CAR 91-001 generic implications review, NHY checked radiographs for an additional 157 piping welds. These welds were selected for review because they exhibited conditions potentially similar to CS-328-02-P0204, i.e., NCRs were written and/or repair was needed. The selection of these welds was based on a search of computer data base NCR

information and a review of the P-H Weld Repair Order (WRO) log (a non-QA planning and scheduling control document). In particular, these welds were selected if they had NCRs with 3 or more repairs noted in the computer data base or the P-H WRO log identified these welds as having 3 or more entries or 3 or more repair cycles.

For each of these 157 instances, NHY verified that a radiograph set was available in the NHY vault and that the set had been reviewed by YAEC.

NHY believes that the circumstances involved in the processing of the radiograph for CS-328-02-F0204 have no discernable generic implications based on the following:

1. The Weld F0204 was incorrectly marked as F0209 on the piping isometric drawing after F0204 was radiographed.
2. F0204 was incorrectly deleted from the piping isometric subsequent to the radiographic examination being performed and accepted (as F0204). As a result, a P-H examiner might have determined that the radiograph was no longer needed and that there was no need to send the radiograph to YAEC for review and subsequent retention in the records vault.
3. F0204 was re-established on the piping isometric approximately 2 years after the radiographic examination for F0204 was performed. In particular, the piping isometric drawing was revised to delete F0209 and re-establish F0204 probably in response to N-5 data report preparation. At that time, a review of the weld history package would have indicated that the weld joint was completed and accepted because a P-H Radiographic Inspection Report (RIR) was available in the package. Thus, documentation to prove that the radiographic examination was performed was available then as it is now.

The information provided above describes a unique set of circumstances. As a result of this information, NHY considers this occurrence to be an isolated one with no discernable generic implications.



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

Docket: 50-443

MAR 05 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 Additional Information on Welds

Based on NRC review of your February 26, 1991 response (NYN-91029) to our February 25, 1991 request for information, we request that New Hampshire Yankee (NHY) provide, by March 11, 1991, the following additional written information on weld radiographs.

- The basis for NHY confidence that required radiographs were made for (Pullman-Higgins) field welds, with satisfactory results and radiograph retention as required.
- Clarification of the number of (Pullman-Higgins) radiographs audited/examined incident to responses to post-construction inquiries concerning weld adequacy.

The basis for this request is the NYN-91029 assertion that a time-consuming review of all as-built isometric drawings of record would be required to verify the Pullman-Higgins radiographs which should be on file. That raises a question of whether NHY (and their agents Pullman-Higgins, the authorized nuclear inspector, and Yankee Atomic Electric Company) ever determined that all required radiographs were made, found acceptable during construction, and were present in the vault. Clarification of the numbers of radiographs retrieved in response to post-construction questions is being requested because it is still not clear to us which sample sets retrieved involved re-examination of the same radiography.

Thank you for your attention to this matter.

Sincerely,

Jan R. Johnson
for Charles W. Hehl, Director
Division of Reactor Projects

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