

New Hampshire Yankee

Ted C. Feigenbaum
President and
Chief Executive Officer

NYN 91051

March 28, 1991

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

- References:
- (a) Facility Operating License No. NPF-86, Docket No. 50-443
 - (b) NHY Letter NYN-91029, dated February 26, 1991, "Response to Request for Information", T.C. Feigenbaum to T.T. Martin
 - (c) NHY Letter NYN-91050, dated March 25, 1991, "Response to Radiograph Review Request", T.C. Feigenbaum to T.T. Martin

Subject: Correction to Prior Correspondence

Gentlemen:

It has come to my attention that the New Hampshire Yankee correspondence of February 26, 1991 [Reference (b)] contains an error. This error was confirmed on March 26, 1991 and was initially identified as a potential error during additional documentation production for the NRC over the course of the preceding work week.

Specifically, on page 1 of enclosure 1 [to Reference (b)] and associated with the 665 number, it was stated that "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."

We have confirmed that two of the 665 Radiographic Inspection Reports (RIR) do not contain proper evidence of YAEC review. However, code acceptable radiography does exist in the NHY records vault and evidence of redundant reviews, equal to or beyond code requirements, does appear on the RIR documents.

These two occurrences are as follows:

Case 1:

Weld number:	RH-151-01-F0102
Code Requirement:	ASME Class 2
P-H Level 2 signatures:	1/7/80 and 6/25/80
P-H Level 3 signature:	8/19/80
ANI Concurrence:	1/14/80 and 6/30/80

9104040258 910328
PDR ADOCK 05000443
P PDR

Case 2:

Weld number:	CBS-1201-01-F0103
Code Requirement:	ASME Class 2
P-H Level 2 signature:	12/27/79
P-H Level 3 signature:	8/18/80
ANI Concurrence:	12/28/79

In terms of immediate corrective actions, once the possibility of an error was identified, NHY initiated a reverification of the 665 record sets utilizing NHY personnel that were organizationally independent from the February 1991 verification effort.

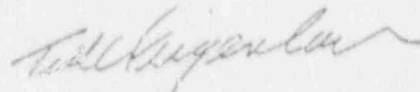
The reverification efforts determined that there were two instances, cited as Cases 1 and 2 above, where YAEC review cannot be confirmed as having occurred. The reasons for these occurrences are not known.

In order to confirm that the final weld radiography is adequate, the radiographs associated with these two weld record sets have been independently read and interpreted as being in compliance with code requirements by an ASNT certified, RT Level 3 individual employed by YAEC. His documented review of the radiograph sets will be added to the existing QA records to complete the record sets.

The root cause analysis and corrective actions associated with the apparent lack of documentation of YAEC review will be carried out in accordance with our complete re-review of the P-H associated welding records as stated in our correspondence of March 25, 1991 [Reference (c)].

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

TCF:NAP/tad

United States Nuclear Regulatory Commission, Region I
Attention: Mr. Thomas T. Martin, Regional Administrator

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