

New Hampshire Yankee

Ted C. Feigenbaum
President and
Chief Executive Officer

NYN-91082

May 20, 1991

United States Nuclear Regulatory Commission
Washington, DC 20555

Attention: Document Control Desk

- References:
- (a) Facility Operating License No. NPF-86, Docket No. 50-443.
 - (b) Transcribed Public Meeting Between New Hampshire Yankee and the NRC conducted on April 10, 1991.
 - (c) NHY Letter NYN-91076 dated May 13, 1991, "Transmittal of the Program Description for the Reverification of Pullman-Higgins Field Weld Records", T. C. Feigenbaum to T. T. Martin.

Subject: Report of Weld Record Anomaly For Field Weld 1-RC-13-02-F0203

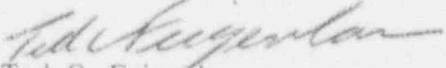
Gentlemen:

In the April 10, 1991 Public Meeting between New Hampshire Yankee (NHY) and the NRC [Reference (b)], and as provided in the NHY Program Description for the Reverification of Pullman-Higgins Field Weld Records, transmitted to the NRC on May 13, 1991 [Reference (c)], NHY agreed to provide the NRC with a written report of any weld record anomalies within 72 hours of the determination that a report is required. Accordingly, enclosed please find a "Report of Weld Record Anomaly for Field Weld 1-RC-13-02-F0203". This report relates to a records anomaly which NHY determined on May 17, 1991, was reportable pursuant to the program description.

As provided in the Enclosure, the identified anomaly is related to a weld record in that it pertains to a lack of administrative information on three pieces of radiographic film. NHY has evaluated this records anomaly and has determined that it does not adversely affect or call into question the physical quality of weld 1-RC-13-02-F0203 or other Seabrook Station welds. Corrective actions to address this anomaly were completed on May 17, 1991. The Justification for Continued Operations contained in the Enclosure has been reviewed by the Station Operation Review Committee (SORC).

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

9105220143 910520
PDR ADOCK 05000443
PDR

TCF:JES/tad

Enclosure

21-20

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

ADD 11

United States Nuclear Regulatory Commission
Attention: Document Control Desk

May 20, 1991
Page two

cc: Mr. Gordon E. Edison, Sr. Project Manager
Project Directorate I-3
Division of Reactor Projects
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Mr. Ebe C. McCabe, Chief
Reactor Projects Section
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

Mr. Thomas T. Martin, Regional Administrator
Region I
475 Allendale Road
King of Prussia, PA 19406

Mr. Kenneth E. Brockman
Office of the Executive Director for Operations
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

Mr. Noel Dudley
NRC Senior Resident Inspector
P.O. Box 1149
Seabrook, NH 03874

Mr. Phil Joukoff
United States Nuclear Regulatory Commission
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596

Mr. Frank Forgione, Special Agent
Office of the Inspector General
United States Nuclear Regulatory Commission
MNBB 6715
Washington, DC 20555

New Hampshire Yankee
May 20, 1991

ENCLOSURE 1 to NYN-91082

REPORT OF WELD RECORDS ANOMALY FOR FIELD WELD 1-RC-13-02-F0203

REPORT OF WELD RECORD ANOMALY
FOR FIELD WELD 1-RC-13-02-F0203

I. Introduction

In the April 10, 1991 Public Meeting between New Hampshire Yankee (NHY) and the NRC, and as provided in the NHY Program Description for the Reverification of Pullman-Higgins Field Weld Records, transmitted to the NRC on May 13, 1991, NHY agreed to provide the NRC with a written report of any weld record anomalies within 72 hours of the determination that a report was required. Accordingly, the following is a report of an identified records deficiency. NHY determined that this anomaly required NRC notification on May 17, 1991, at 9:30 A.M.

The identified deficiency is solely related to weld records in that it pertains to a lack of information on three pieces of radiographic film. NHY has evaluated this records deficiency and has determined that it does not adversely affect or call into question the physical quality of weld 1-RC-13-02-F0203 or Seabrook Station welds at this time. The following provides the code requirements, a description of the identified deficiency, cause of the deficiency, corrective actions which are to be implemented, and a justification for continued operation regarding the identified deficiency.

II. Code Requirements

Section V of the ASME Boiler and Pressure Vessel Code, entitled "Nondestructive Examination" provides the code requirements for information which is to be maintained on radiographic film. Specifically, paragraph T-236 entitled "System of Identification," states that "[a] system shall be used to produce permanent identification on the radiograph traceable to the contract, component, weld or weld seam, or part numbers as appropriate. In addition, the Manufacturer's symbol or name and the date of the radiograph shall be plainly and permanently included on the radiograph. This identification system does not necessarily require that the information appear as radiographic images."

III. Description of the Deficiency

Pullman-Higgins field weld 1-RC-13-02-F0203 is a circumferential butt weld on a twelve inch diameter section of piping in the Residual Heat Removal (RHR) system. This section of the RHR system is ASME III, Class 2, and Safety Class 2. This weld is located adjacent to check valve CBS V-55 in line 1209-02, which is the RHR Pump 8A supply from the Refueling Water Storage Tank. This weld is physically located in the RHR Vault Number 1, in the Primary Auxiliary Building which is outside the Containment Building. (Reference NHY P&ID 1-CBS-D20233). This field weld was radiographed in 1981 in accordance with the Non Destructive Examination (NDE) requirements contained in the 1977 Edition of ASME Section III up through and including the Winter 1977 Addenda (the code applicable to Seabrook Station).

The weld records package for weld 1-RC-13-02-F0203 contains a Radiograph Inspection Report (RIR) and the radiographic film. The RIR indicates that the radiograph views for all stations of this weld are of acceptable quality. The RIR also contains the approval signatures of the Level II Pullman-Higgins reviewer, Authorized Nuclear Inspector (ANI), and

the Yankee Atomic Electric Company (YAEC) reviewer. At the time this radiograph was reviewed, the ASME Code approval process included the Level II Pullman-Higgins reviewer and the ANI. YAEC provided a review in order to satisfy Quality Assurance Program requirements. Level III Pullman-Higgins review was added to the review process at a later point and therefore is not a requirement for this field weld.

As required by ASME V, including paragraph T-236, NHY maintains the Radiograph Inspection Report (RIR) and the radiographic film for this weld. The RIR and the radiographic film for one of this weld's four stations (station 3-0), contains the Code required information and approvals. As identified in NHY Corrective Action Request (CAR) 91-010, the radiographic film for stations 0-1, 1-2, and 2-3 lack the identification of the exposure date, system/line/isometric number, weld number, and manufacturer's identification. The only information contained on these films is the station number. Therefore, the film for these three stations does not meet the code requirements.

NHY Nuclear Quality Group personnel have verified that the radiographic film for stations 0-1, 1-2, and 2-3, are in fact that of weld F0203. The radiographic technique utilized for this weld allowed a portion of the film for each station to overlap onto the adjacent stations' area of interest. Comparison of the film for all four stations indicates that there are unique identifiers (e.g., unique weld profile; and code allowable inclusions) in the overlapping portions of each stations' film. Therefore, the film for all four stations are contiguous, and are of weld 1-RC-13-02-F0203. This radiographic film comparison was performed by a NHY Level II RT reviewer on May 17, 1991.

NHY Nuclear Quality Group personnel have also verified that the film reviewed for weld F0203 is the only film available for this weld. Review of the weld process sheets indicates that no repairs were made to this weld before or after the weld was radiographed. As a result of the above reviews, NHY has determined that the films for stations 0-1, 1-2, and 2-3 are of Pullman-Higgins field weld 1-RC-13-02-F0203.

IV. Cause of Deficiency

NHY has reviewed the identified records deficiency and has determined its cause to be personnel error on the part of Pullman-Higgins NDE personnel. The Pullman-Higgins NDE personnel apparently neglected to place the required field weld identification tag on the radiographic film for these three stations when the film was developed. Identification of radiographic film as required by code was an explicit provision of the Pullman-Higgins Radiographic Procedure 1X-RT-1-W77.

V. Corrective Actions

NHY has determined that the appropriate short-term corrective actions for this records deficiency are to: 1) permanently identify the code required information on the radiographic film for stations 0-1, 1-2, and 2-3 for weld 1-RC-13-02-F0203; and 2) reference the CAR on the film package for this weld. Actions 1 and 2 above are specifically allowed for by the Code (T-236), and once completed they will ensure compliance with the code. NHY completed these corrective actions by May 17, 1991.

If similar anomalies are found during the conduct of the balance of the Weld Records Reverification Project, long-term corrective actions will include the evaluation of such

anomalies, as a group, for generic implications and possible additional corrective actions.

VI. Justification for Continued Operation

The following provides a Justification for Continued Operation (JCO) of Seabrook Station for the time period between the determination that the aforementioned weld records deficiency required NRC notification and the time that corrective actions for the deficiency are implemented. This JCO demonstrates that the identified weld records deficiency does not produce any reduction in the protection provided for the health and safety of the public.

As provided in Section III above, NHY has conclusively determined that radiographic film is available for all four stations of Pullman-Higgins field weld 1-RC-13-02-F0203. As indicated on this weld's Radiograph Inspection Report, the radiograph film at all four stations indicates that this weld is of acceptable quality. Based on this, there are no outstanding questions regarding the quality of this field weld and thus no outstanding questions regarding the integrity of the RHR system. Additionally, the RHR system has been extensively tested during preoperational and startup testing. Moreover, this system has been operating for the past year. Throughout testing and operation, no problems with this weld have been identified. Since the identified records deficiency does not compromise the integrity of Seabrook Station, there is no reduction in the protection provided for the health and safety of the public.

NHY has also performed a safety evaluation for this JCO and has determined that an unreviewed safety question does not exist. Specifically, since the identified records deficiency does not compromise the integrity of the RHR system, it does not increase the probability or consequences of accidents or malfunctions previously evaluated in the Final Safety Analysis Report (FSAR). The mere presence of a records deficiency does not introduce a new failure mechanism nor does it modify the plant in any manner so as to create the possibility of a new accident or malfunction occurring. This record deficiency does not provide any means for an increase in the dose from any previously analyzed accident as it does not make any changes to the plant or its design basis. The margin of safety as defined in the basis for any technical specification will not be reduced by this records anomaly since it does not compromise the integrity of the RHR system.

Based on the foregoing, the identified records deficiency does not present an unreviewed safety question and it does not compromise the integrity of Seabrook Station. Thus, this records anomaly does not reduce the protection provided for the health and safety of the public.