PSNH

Public Service of New Hampshire

SEABROOK STATION
Engineering Office:
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September 1, 1983

SBN- 555
T.F.B 4.2.7

United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Attention: Mr. Richard W. Starostecki, Director
Division of Project and Resident Programs

References:
(a) Construction Permits CPPR-135 and CPPR-136, Docket Nos. 50-443 and 50-444
(b) USNRC Letter, dated July 19, 1983, "Combined Inspection Nos. 50-443/83-09 and 50-444/83-08", R. W. Starostecki to R. J. Harrison
(c) PSNH Letter, dated August 16, 1983, "Extension Requests for Response to Combined Inspection Nos. 50-443/83-09 and 50-444/83-08", J. DeVincentis to R. W. Starostecki

Subject: Response to Combined Inspection Nos. 50-443/83-09 and 50-444/83-08

Dear Sir:

In response to the violation which was reported in the subject inspection, we offer the following:

NRC Notice of Violation (443/83-09-01)

10CFR50, Appendix B, Criterion XVI and Section 17.1.1.16 of the Seabrook Station FSAR require that the program established to assure that conditions adverse to quality are identified and corrected, includes measures to preclude repetition. The Nuclear Quality Assurance Manuals for United Engineers & Constructors (UE&C) and Pullman Power Products establish the responsibility for verifying the adequacy of corrective measures, to include the identification of the causes of deviations and nonconformances in ASME Code, Section III, Division I work, to preclude recurrence. The implementation of adequate corrective action requires the identification of those conditions to which it applies.

Contrary to the above, as of June 10, 1983, the corrective action programs of United Engineers & Constructors and Pullman Power Products had been inadequately implemented in the failure to identify and correct the following recurrent conditions adverse to the quality of ASME Code, Section III, Division I work:

A. Deviation, as used in the Pullman Power Products Nuclear Quality Assurance Manual, from design in allowing the erection tolerances for the installation of pipe supports to be exceeded, in that Pullman-Higgins' Procedure JS-IX-6 incorrectly addressed angular tolerances.

B. Nonconformance with procedures for controlling pipe spool piece erection such that installation and inspection process sheets were not retrievable for spool piece CC-720-1.

This is a Severity Level IV Violation (Supplement II).

Response

Corrective Action Taken and Results Achieved

A. When the problem was initially identified, the installation contractor (Pullman-Higgins) was working to Procedure JS-IX-6, as revised by UE&C Engineering Change Authorization (ECA) 25/0912B. The ECA was subsequently voided and Pullman-Higgins revised JS-IX-6 to incorporate appropriate requirements from UE&C Procedure TP-10 to correct the condition. However, cognizant personnel failed to review JS-IX-6, or other applicable procedures, to assure that similar conditions did not exist elsewhere.

Subsequently, the NRC inspector noted that JS-IX-6 required further revision to correct a similar condition applicable to angular deviations. ECA25/5137A was issued on June 13, 1983, to correct the condition, and Pullman-Higgins issued an Interim Procedure Revision (IPR) to correct the condition.

To prevent recurrence of this situation, Pullman-Higgins will revise their Procedure III-4 to clarify existing requirements that ECAs must be reviewed for procedure applicability and that procedures must be revised, as appropriate, to incorporate ECA requirements.

The necessary procedure revisions will be submitted for approval by September 2, 1983. Yankee Atomic Electric Company will follow this item to insure proper implementation.

B. The installation contractor, Pullman-Higgins, initiated nonconformance reports to document that quality records (weld process sheets) associated with the installation of temporary spool pieces were missing. A search of both the rod room and craft work area to locate the missing records proved unsuccessful.

When the flow elements that will replace the temporary spool pieces are available, the temporary pieces will be removed and the weld preps examined for compliance with ASME Section III requirements.

To assure the retention of installation records, more stringent controls have been initiated in the rod room control area. Additionally, a Lead Process Engineer has been assigned the sole duty of supervising the rod rooms to assure that controlling activities reflect procedure requirements. Corrective action was achieved on June 23, 1983.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY

John DeVincentis
Project Manager

JD/smh

cc: Atomic Safety and Licensing Board Service List