

HARMON, CURRAN, GALLAGHER & SPIELBERG

2001 S STREET, N.W.  
SUITE 430  
WASHINGTON, D.C. 20009-1125

GAIL MCGREEVY HARMON  
DIANE CURRAN  
ANNE SPIELBERG  
JANNE G. GALLAGHER  
JESSICA A. LADD\*

Of Counsel:  
ERIC R. GLITZENSTEIN  
CATHERINE A. MEYER

TELEPHONE  
(202) 328-3500  
FAX  
(202) 328-6918

June 6, 1991

\*Admitted only in Massachusetts

Kenneth M. Carr, Chairman  
Kenneth C. Rogers  
James R. Curtiss  
Forrest J. Remick  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

SUBJECT: Meeting on Seabrook weld review

Dear Commissioners:

I have been informed today of a proposed meeting on Monday, June 10, 1991, between the Nuclear Regulatory Commission Staff's Region I office and New Hampshire Yankee, to discuss significant new information regarding the quality of safety welds at the Seabrook nuclear power plant. According to the attached NRC Staff document, entitled "Seabrook Weld Record Reverification," 38 weld radiographs that were "previously called into question" have been inspected by NRC's Nondestructive Laboratory Level III, which found that one of the welds had an "internal condition" that received no documented evaluation by the licensee; and that ten other welds "exhibited film quality conditions" which "potentially jeopardize the ASME Code compliance." This extremely high failure rate -- over 25% -- is a matter of grave concern to my client, the New England Coalition on Nuclear Pollution, which is an intervenor in the Seabrook operating license case.

NRC's policy statement for technical review of domestic license applications provides that "All meetings conducted by the NRC technical staff as part of its review of a particular domestic license or permit application (including an application for an amendment to a license or permit) will be open to attendance by all parties." 43 Fed. Reg. 28,058 (June 28, 1978). According to Gordon Edison, the NRC's Project Manager for Seabrook, however, the NRC Staff intends to close its June 10th meeting to the public, on the ground that it involves "enforcement" issues. To the contrary, by its own terms, the Seabrook weld review process relates to licensing: it is a "reverification" of whether the Seabrook operating license was properly issued. Moreover, as you

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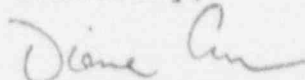
know, the operating license case has not been closed, and is still pending before you.

The Staff's decision to close the June 10th meeting is flatly inconsistent with the NRC's policy for holding open licensing meetings. As it has with all other licensing meetings regarding Seabrook, the Staff should be required to conduct the meeting publicly. All future meetings regarding the Seabrook weeds should also be held in public.

We ask that you take immediate action to order that the June 10th meeting be open to the parties and their representatives, and that all of the Seabrook parties be informed of the exact time and place of the meeting. In addition, because the meeting concerns matters of serious safety significance that are under Congressional investigation, we ask that the meeting be transcribed by a court reporter.

Thank you for your prompt attention to this matter.

Sincerely,



Diane Curran

Counsel to New England  
Coalition on Nuclear Pollution

Encl.

cc: James Taylor  
Executive Director for Operations  
Seabrook Service list

## SEABROOK WELD RECORD REVERIFICATION

As part of the Region I Seabrook weld record reverification program overview, the Mobile Nondestructive Laboratory Level III was tasked to perform an overview of the licensee's review program and to independently examine ASME Code radiographic films for weld and film quality. The resident inspector selected 38 welds that were previously called into question either through the licensee's review process or the congress. The NRC examination of these welds disclosed the following:

Weld CBS 1201 01 F0103 demonstrated an internal condition that should have been evaluated in the radiographic reviewer's sheet. The weld radiograph had been recently reviewed by the NHY (YAEC) Level III and pronounced acceptable. Our review determined that there was no documentation or evaluation of the condition. Subsequently, the licensee produced the weld process record that contain a quality control inspection for visual internal weld examination. The NRC accepted the documentation for establishing that the condition did not represent a threat to the structural integrity of the weld. However, the issue remains concerning the basis that the licensee's Level III recently used to disposition the weld as acceptable.

Ten other welds exhibited film quality conditions that included the lack of the required penetrometer sensitivity, film artifacts, procedural technique inconsistencies, and film identification deficiencies which potentially jeopardize the ASME Code compliance. One of these deficiencies was resolved before the end of the inspection. The remainder are currently under review by the licensee and the NRC Level III technical staff.

The foregoing issues call into question the adequacy of the licensee's documentation process for recent evaluations of the weld records. Weld CBS 1201 01 F0103 was recently reviewed by the licensee's Level III because it did not contain the committed YAEC quality overview. The Level III did not record his review or observations that would provide the objective evidence of his review and acceptance.

Because of the considerable number of weld radiographs reviewed by the NRC over the construction life of the plant and the recent review conducted by the Independent Review Team as discussed in NUREG 1425, the extent of the film quality problems can not be determined at this time. The NRC Level III reviewer discussed his findings with the licensee's technical staff and they are performing their own assessment. The licensee has been informed that we consider this issue to be encompassed by the reporting agreement which would require NHY to report these deficiencies once they have determined them to be reportable.