PSNH PUBLIC SERVICE
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February 2, 1984

SBN- 622
T.F. B4.2.7

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 December 27, 1983, "Combined Inspection Nos. 50-443/83-17; 50-444/83-13", R. W. Starostecki to R. J. Harrison

Subject: Response to Combined Inspection Nos. 50-443/83-17; 50-444/83-13

Dear Sir:

It was reported in the subject Inspection Report that certain of our activities were not conducted in accordance with commitments in the FSAR. In response to the reported FSAR deviations, we offer the following:

FSAR Deviation A

The Seabrook FSAR, Section 3.8.1.1, states that containment liner welds that are embedded in concrete are leak chased to a system which permits leak testing of the welds throughout the life of the plant.

Contrary to the above, the leak chase channels around containment penetrations, X60 and X61, were not connected to the piping system which vents the leak chases through the concrete to the containment atmosphere. Thus, no capability exists for the future leak testing of these particular penetration welds.

This deviation is applicable to Docket Nos. 50-443 and 50-444.

YAEC Position

The liner welds for containment penetrations X60 and X61 were properly tested before the welds became inaccessible. The QA records for these welds were recently examined to confirm this. The welds successfully underwent non-destructive examinations and leak testing to meet code requirements.

We intended to provide future leak testing of these welds, but inadvertently the venting pipes which connected the leak chase channels to the containment atmosphere were left out during construction. Because it is not a code requirement to provide leak chase channels for future testing and because the total weld length for these two penetrations is extremely small in relation to the total amount of containment liner welding, we will not perform the extensive backfitting required to install the venting pipes.

Corrective Action

The Seabrook FSAR Section 3.8.1 will be amended to reflect the above position.

FSAR Deviation B

The Seabrook FSAR, Section 8.3.1.1.e.3, indicates design of the diesel generator bus ducts to prevent a single event from disabling both of the redundant diesel generator systems.

Contrary to the above, the diesel generator, non-segregated phase, 5 kV bus ducts for both trains were installed without adequate consideration of the ability of the misalignment collars to act as vibration dampers. Thus, existing accepted field conditions fail to provide design assurance that a single event (i.e., seismic) will not disable both of the redundant diesel generator systems.

This deviation is applicable to Docket No. 50-443.

YAEC Position

The referenced SB FSAR Section 8.3.1.1.e.3 pertains to the routing and physical separation of the bus duct such that a single event such as fire, missile, etc., will not disable both redundant diesel generator systems. Hence, there is no deviation to the above referenced FSAR section.

However, a deviation from the intent of the specification of the 5 kV non-segregated phase bus duct, No. 9763-006-144-1, Section 3.2.5.2.3, entitled "Vibration and Expansion Joints" does exist. The manufacturer provided the correct part to allow for movement due to expansion of the bus enclosure, and misalignment of the diesel generator terminal box. Unfortunately, the misalignment of the diesel generator box was beyond the margin that the manufacturer had envisioned when the proper part was designed; thus, potential damage could have occurred to the bus enclosure due to vibration or other movements.

Corrective Action

To correct the above described deviation, the manufacturer of the bus duct has been requested to manufacture spacers at the diesel generator terminal box in order to bring the misalignment within acceptable limits to allow the existing misalignment collars to function according to Section 3.2.5.2.3 of Specification No. 9763-006-144-1.

Delivery of these spacers is expected by the end of March 1984, and installation is expected by the end of April 1984.

FSAR Deviation C

The Seabrook FSAR, Section 6.2.2.2.e and Figure 6.2-77, indicates that the containment isolation valves, for the recirculation piping feeding the suction of the containment spray and residual heat removal pumps, are housed in encapsulation tanks designed to withstand containment design pressure and to meet Safety Class 2 criteria. The FSAR further commits to ANSI N18.2, which specifies that Safety Class 2 tanks are to be designed and installed to ASME Section III, Code Class 2 criteria.

Contrary to the above, the encapsulation tanks (CBS-TK-101A and 101B) for the recirculation piping, containment isolation valves were improperly designed and installed with regard to ASME Section III, Code Class 2 criteria, in that the tank piping penetration seam closure welds were designated as fillet welds, instead of the Code-specified full penetration welds.

This deviation is applicable to Docket No. 50-443.

YAEC Position

The incorrect weld designation was detailed due to a misinterpretation of the ASME code. The piping penetration seam closure weld was thought to be the closing seam of a typical electrical or mechanical penetration assembly. However, in this case the pressure retaining boundary extends beyond the containment liner penetration to the encapsulation tank and the encapsulation tank expansion joint.

Corrective Action

The weld detail will be revised to satisfy ASME III, Code Class 2, criteria by April 30, 1984. We are currently evaluating other areas where there may exist a similar potential misinterpretation of ASME Code designation requirements. We expect this evaluation to be completed by February 29, 1984.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY

John DeVincentis
Project Manager

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