

November 2, 1983

SBN-575
T.F. B4.2.7

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

Attention: Mr. Thomas T. Martin, Director
Division of Engineering and Technical Programs

References: (a) Construction Permits CPPR-135 and CPPR-136; Docket Nos.
50-443 and 50-444
(b) USNRC Letter, dated October 5, 1983, "Inspection Report No.
50-443/83-12", T. T. Martin to R. J. Harrison

Subject: Response to Inspection Report No. 50-443/83-12

Dear Sir:

In response to the violation which you reported in the subject Inspection Report, we offer the following:

NRC Notice of Violation (443/83-12-02)

10CFR50, Appendix B, Criterion IX requires that special process such as nondestructive testing be accomplished in accordance with qualified procedures. The Seabrook FSAR, Paragraph 17.1.1.9, requires that special processes be qualified in accordance with applicable codes. United Engineers and Constructors Specification 9763-WS-1-NF, Paragraph 4.1C, requires that written procedures be used for all examination and test methods and that they detail the specific requirements of NF-5112. ASME Section III, subsection NF-5112, 1977 Edition, requires that all nondestructive examinations performed under this subsection shall be executed in accordance with detailed written procedures which have been proved (qualified) capable of detecting discontinuities.

Contrary to the above, during the period from July 18, 1983 to August 4, 1983, ASME Class 1 support welds 48 RG 22 FW-27RI and FW-30RI, SI 202 RM 15FW-1, SI 203 RM 9 FW-1 and SI 201 RM 10 FW-1 and FW-2, and all fillet welds were ultrasonically examined in accordance with Pullman-Higgins ultrasonic examination procedure number IX-UT-1-W77, Revision 1, which is not qualified for fillet weld examination.

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

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RESPONSE

Corrective Action Taken and Results Achieved

We do not concur with the violation as stated and as we understand it. The basis for this determination is as follows:

Investigations by YAEC, UE&C (Construction Manager) and the installation contractor (P-H) have determined that the ultrasonic procedure used, as described in procedure IX-UT-1-W77, Revision 1, results in a meaningful code acceptable inspection.

The calibration technique for shear wave testing, used for fillet welds, is not dependent upon the type of weld configuration. Set-up and calibration standards are addressed in the procedure and cover specific test parameters. The standards are used in conjunction with basic calibration blocks and standards. The wedge angle used is dependent upon the weld joint angles.

Manufactured joint samples, representing the basic joints questioned by the NRC, were prepared. A duplication of the set-up and calibration used at the time of the original inspection yielded results which showed that the present procedure is code acceptable. Subsequent radiography performed on these samples confirmed that the UT yielded meaningful results.

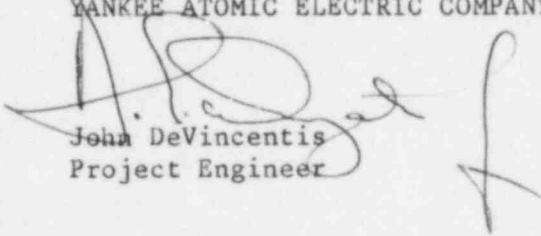
Additionally, as required by ASME, Section III, the subject weld had passed a magnetic particle examination.

P-H has revised their UT report documentation to provide sufficient information to permit accurate duplication of inspections should such action be necessary.

Corrective action is complete.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY



John DeVincentis
Project Engineer

JDV/mec

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