

March 21, 1984

SEN- 641
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 February 17, 1984, "Combined Inspection
Nos. 50-443/83-22 and 50-444/83-15", R. W. Starostecki to
R. J. Harrison

Subject: Response to Combined Inspection Nos. 50-443/83-22 and
50-444/83-15

Dear Sir:

In response to the violation which you reported in the subject inspection
[Reference (b)], we offer the following:

NRC Notice of Violation (443/83-22-03):

10CFR50, Appendix B, Criterion XV and the Seabrook Station FSAR, Section 17.1.1.15, require that the measures established to control nonconforming items include documentation, review, and disposition. The FSAR also presents pictorially in Figure 3.7(B)-31 a typical supported cable tray system used as a model for the seismic design of the tray supports. UE&C Drawing M300229 details illustrate typical sliding fit connections as the means of complying with the seismic design model. Specific exceptions to the typical details are authorized (e.g., ICA 23/0052A), but provide for maintenance of the sliding fit gap. Both 10CFR50, Appendix B and the FSAR require that installation activities conform to applicable drawings.

Contrary to the above, as of January 12, 1984, rework activities, conducted to correct a previously identified generic nonconformance with the required sliding fit design details, failed to identify and apply the needed rework to specific exception conditions (e.g., ICA 23/0052A). This resulted in the failure to document, review, and correct items nonconforming to the seismic design details of Drawing M300229.

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

William S. Jordan, III, Esquire
Harmon & Weiss
1725 I Street, N.W. Suite 506
Washington, DC 20006

Roy P. Lessy, Jr., Esquire
Office of the Executive Legal Director
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Robert A. Backus, Esquire
116 Lowell Street
P.O. Box 516
Manchester, NH 03105

Philip Ahrens, Esquire
Assistant Attorney General
Department of the Attorney General
Augusta, ME 04333

Mr. John B. Tanzer
Designated Representative of
the Town of Hampton
5 Morningside Drive
Hampton, NH 03842

Roberta C. Pevear
Designated Representative of
the Town of Hampton Falls
Drinkwater Road
Hampton Falls, NH 03844

Mrs. Sandra Gavutis
Designated Representative of
the Town of Kensington
RFD 1
East Kingston, NH 03827

Jo Ann Shotwell, Esquire
Assistant Attorney General
Environmental Protection Bureau
Department of the Attorney General
One Ashburton Place, 19th Floor
Boston, MA 02108

Senator Gordon J. Humphrey
U.S. Senate
Washington, DC 20510
(Attn: Tom Burack)

Diana P. Randall
70 Collins Street
SEabrook, NH 03874

Donald E. Chick
Town Manager
Town of Exeter
10 Front Street
Exeter, NH 03833

Brentwood Board of Selectmen
RED Dalton Road
Brentwood, New Hampshire 03833

Edward F. Meany
Designated Representative of
the Town of Rye
155 Washington Road
Rye, NH 03870

Calvin A. Canney
City Manager
City Hall
126 Daniel Street
Portsmouth, NH 03801

Dana Bisbee, Esquire
Assistant Attorney General
Office of the Attorney General
208 State House Annex
Concord, NH 03301

Anne Verge, Chairperson
Board of Selectmen
Town Hall
South Hampton, NH 03842

Patrick J. McKeon
Selectmen's Office
10 Central Road
Rye, NH 03870

Carole F. Kagan, Esq.
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. Angie Machiros
Chairman of the Board of Selectmen
Town of Newbury
Newbury, MA 01950

Town Manager's Office
Town Hall - Friend Street
Amesbury, Ma. 01913

Senator Gordon J. Humphrey
1 Pillsbury Street
Concord, NH 03301
(Attn: Herb Roynton)

Richard E. Sullivan, Mayor
City Hall
Newburyport, MA 01950

Response:

Corrective Action Taken and Results Achieved:

The licensee offers an explanation to the several concerns stated in the subject Inspection Report:

Concern 1

There may be an interface problem between the A/E and contractor.

Response to Concern 1

The contractor continues to question and identify conflicting information. Further, there are many documented instances where the contractor identified problems and proposed solutions which form the basis for many ECAs. The A/E-contractor interface is effective, the change program is controlled, and design changes are verified by the concurrence program.

Concern 2

The rework instructions failed to identify and apply the needed rework to specific exception conditions.

This concern arose from NRC violation (443/83-02/-02) of April 1983, wherein the NRC questioned the design of a typical floor to ceiling cable tray support as illustrated in the FSAR with a sliding gap. UE&C then issued a generic Engineering Change Authorization (ECA) 03/2001A to give generic retrofit instruction to the contractor to rework previously installed supports of this type, by removing the bolts from the upper boot to give a sliding gap.

Prior to issuing the generic ECA, which addressed 33FN and 33FD fittings, ICA 23/0052A was issued in 10/81, addressing a similar support (T-14) which substituted a 33DU fitting to resolve an interference. This ICA included a note to maintain a sliding fit. The support as installed did not include a sliding fit.

Response to Concern 2

In order to prevent recurrence of this situation, the following actions have been taken:

1. The support addressed by ICA 23/0052A and other similar conditions has been reviewed and found acceptable without the sliding fit, thus no hardware changes are required.
2. To assure that the scope of work is understood by the contractor, UE&C established a program which was implemented in April 1983, to review in detail the more complex generic or retrofit ECAs with the contractor prior to issue. This has further strengthened the A/E-contractor interface.

NRC Notice of Violation (443/83-22-04):

10CFR50, Appendix B, Criterion V and Section 17.1.1.5 of the Seabrook Station FSAR require that activities affecting quality be controlled by and accomplished in accordance with the appropriate instructions, procedures, or drawings. Seabrook Station Test Program Instruction, TPI-11, requires the issuance of Work Requests to initiate, authorize, and document any rework activities being conducted on equipment under the control of the Startup Test Department. TPI-11 also provides for a program of tracking the work performed under Work Request authorization to final work acceptance and closure of the affected incomplete items.

Contrary to the above, as of December 27, 1983, rework activities were conducted on equipment under the control of the Startup Test Department, in one case without issuance of a Work Request, and in another case without proper written authorization for all the work performed. In neither case did the TPI-11 program tracking the work identify the existing incomplete items on the equipment.

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

Response:

Corrective Action Taken and Results Achieved:

The violation was caused by a misunderstanding relative to the scope of work as described in a Startup Test Department (STD) Work Request, which had been initiated to determinate cables from Valve CBS-V-5.

In order to prevent recurrence of this situation, the following actions have taken place:

1. FBM (electrical contractor) will revise their procedures to make it clear that the STD Work Request is the governing document when work is performed on equipment under STD jurisdiction.
2. An NCR has been written, and the engineering disposition will define the work to be performed on Valve CBS-V-5.
3. STD has issued a memo to the Construction Manager to clarify the program for accomplishing work on equipment under STD jurisdiction.
4. STD Procedure TPI-11 (Work Requests) has been revised to positively delineate Work Request program requirements.

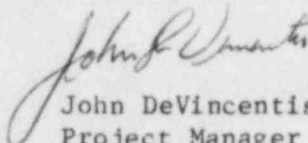
United States Nuclear Regulatory Commission
Attention: Mr. Richard W. Starostecki, Director

March 21, 1984
Page 4

Corrective action will be completed by April 15, 1984.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY


John DeVincentis
Project Manager

cc: Atomic Safety and Licensing Board Service List

Director, Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, DC 20555