



SEABROOK STATION
Engineering Office

Public Service of New Hampshire

New Hampshire Yankee Division

December 28, 1984

SBN- 744

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

Reference: (a) Construction Permits CPPR-135 and CPPR-136,
Docket Nos. 50-443 and 50-444
(b) USNRC Letter, dated November 27, 1984, "Combined Inspection
Nos. 50-443/84-13; 50-444/84-05", H. B. Kister to
R. J. Harrison

Subject: Response to Combined Inspection Nos. 50-443/84-13 and
50-444/84-05

Dear Sir:

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

NRC Notice of Violation (443/84-13-04):

10CFR50, Appendix B, Criterion XVII and the Seabrook Station FSAR, Section 17.1.1.17, require that records be maintained to furnish evidence of activities affecting quality, to include the results of work performance and material analyses. In accordance with Appendix B Criterion IX, the work performance of special processes shall be accomplished to meet applicable criteria. UE&C Engineering Change Authorization (ECA) 01/2374 specified certain of those criteria required for adequate bolt installation in the steam generator lower lateral support members. In accordance with Appendix B Criterion VIII, item material identification (e.g., heat numbers) shall be maintained on records traceable to the item. UE&C disposition to a contractor nonconformance report, documenting the lack of heat number traceability for certain steam generator lateral support member parts, required revision to the supplier's quality release records.

Contrary to the above, as of October 26, 1984, the records documenting work performance and material traceability for the steam generator lateral support members were inadequate, in that:

- (1) Documented evidence was not available to substantiate complete compliance with the criteria of ECA 01/2374.

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- (2) Supplier quality release records had not been revised to document complete item heat number traceability to the material test results.

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

Response:

Corrective Action Taken and Results Achieved

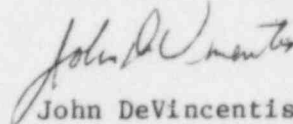
- (1) Operation No. 4 on the Pullman-Higgins process sheets for installing the lower lateral supports calls for torquing to a snug tight condition, approximately 200 ft/lbs (up to 2,000 ft/lbs) in 100 ft/lbs increments, referencing Field Instruction FI-120 as the applicable procedure. This field instruction delineates, step by step the method for obtaining reasonable contact at the splice joints, in accordance with ECA 01/2374C. Although there was no QC Hold Point on this step, sufficient evidence does exist to document the fact that field instruction FI-120 was followed. This evidence exists in the form of the Pullman-Higgins field engineer's records, mapping the gap dimensions required in step 2 on sheet 2 of ECA 01/2374C and the QC inspector's personal records documenting that the nuts were checked to see if they ran free on the bolt threads. It should be noted that spare nuts were available and at those places where the QC inspector's records show that there were problems with the nuts running free, spare nuts were used.

In addition, the physical existence of the shims and the QC inspector's marking on the bolts which indicates completion of torquing also indicates compliance with FI-120. In order to complete the document package for the installation of these supports, Pullman-Higgins will be directed to include a copy of the engineer's and QC inspector's records in with the process sheets and field instruction in the document package.

- (2) This discrepancy has been addressed in a Pullman-Higgins NCR since they had prematurely closed the NCR which, as part of its' resolution, required the obtaining of corrected Quality Releases from Westinghouse. Subsequently, Westinghouse was requested to provide the corrected documentation and they are now in the process of revising the Quality Releases for formal transmittal to the site.

Corrective action will be completed by February 28, 1985.

Very truly yours,



John DeVincentis, Director
Engineering and Licensing

cc: Atomic Safety and Licensing Board Service List

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