



Public Service of New Hampshire

NEW HAMPSHIRE YANKEE DIVISION

May 23, 1985

SBN- 805

T.F. B4.2.7

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

Attention: Mr. Stewart D. Ebnetter, Director
Division of Reactor Safety

References: (a) Construction Permits CPPR-135 and CPPR-136,
Docket Nos. 50-443 and 50-444

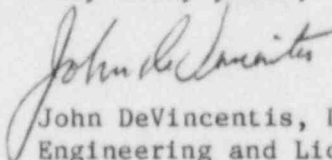
(b) USNRC Letter dated April 25, 1985, "Inspection
Report No. 50-443/85-03", S.D. Ebnetter to
R.J. Harrison

Subject: Response to Inspection Report No. 50-443/85-03

Dear Sir:

Our response to the violation reported in the subject inspection
is provided in Attachment A, included herewith. The corrective
action completion dates are also provided therein.

Very truly yours,



John DeVincentis, Director
Engineering and Licensing

Attachment

cc: Atomic Safety and Licensing Board Service List

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(ATTN: Herb Boynton)

ATTACHMENT A

NRC Notice of Violation 443/85-03-01

10CFR50, Appendix B, Criterion VIII states, in part, that "Measures shall be established for the identification and control of materials, parts, and components... throughout... installation and use of the item."

The Seabrook Station FSAR, Section 8.1.5.2, states that electrical equipment will conform to IEEE standards 279 and 308. These standards require that equipment be identified to assure proper installation, operation, surveillance and maintenance.

Electrical Procedure FEP 519, Revision 0, Interim Procedure Change (IPC) 4, page 7, paragraph 5.2.1 states, "Equipment shall be checked for its correct item number and/or number with correct nameplate."

Contrary to the above, on February 12, 1985, the following safety electric equipment did not have identifying nameplates attached as required by the procedure:

- Reactor Trip Switchgear 1-CP-CP-111
- Reactor Trip Logic Panel Trian B (front) 1-MM-CP-13
- Class 1E 125 volt Batteries (four)

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

Response

In order to evaluate this violation and to determine what corrective action, if any, should be taken we have subdivided this into two categories - Westinghouse (W) supplied equipment and United Engineers and Constructors, (UE&C) supplied equipment. This categorization is necessary because Westinghouse supplied equipment is not furnished with a namplate specifying the UE&C equipment tag number.

A. United Engineers & Constructors Supplied Equipment:

The Class 1E 125 volt batteries (4) are a UE&C supplied item. The failure to have the batteries identified with a permanent identification nameplate is a nonconforming condition. The batteries will be identified by a nameplate attached to one of the racks in each battery room as well as on each door entering into a battery room (4 total). Our investigation of this nonconformity concluded that this was an isolated incident for UE&C equipment.

Corrective Action

A Nonconformance Report, Number 82/544A, has been issued addressing this nonconformity. The required tagging will be completed by November 1, 1985.

ATTACHMENT A

B. Westinghouse (W) Supplied Equipment:

After reviewing procedures and specifications governing the identification tagging of W supplied equipment, we do not believe that we have violated 10CFR50 Appendix B, Criterion VIII; IEEE Standards 279 and 308 or Electrical Procedure FEP-519. The following provides in more detail the justification why our procedures are adequate and that there was effective implementation of these procedures.

Westinghouse is not required, by contract, to furnish NSSS equipment with the UE&C equipment tag number identified on the equipment. Accordingly, these items are tagged upon receipt inspection (Reference Procedure QCP 7-2) in accordance with UE&C's specification No. 9763.006-5-11. The tagging method used, at receipt inspection, for NSSS electrical equipment (e.g. switchgear, panels) is attachment of a stainless steel nameplate to the equipment by means of a stainless steel wire. It should be noted that until the tagging operation has been completed a given item is held in receipt inspection.

Prior to turning over NSSS Electrical Equipment to the Startup Test Department (STD) a permanent plant nameplate (e.g. phenolic nameplate) is attached to the equipment in accordance with electrical procedure FEP-519. This permanent plant nameplate is provided mainly to make NSSS electrical equipment consistent with the tagging of UE&C supplied electrical equipment.

To summarize the above, the stainless steel nameplate affixed to the NSSS electrical equipment at receipt inspection is the primary means of correctly identifying the equipment until the permanent plant nameplate is attached to the equipment. Since the stainless steel nameplate is then redundant it's attachment to the equipment is no longer controlled. Therefore, by means of the above we have established controls to identify NSSS electrical equipment "... throughout ... installation and use of the item".

In regards to the implementation of the above described procedure for the W electrical equipment cited in your notice of violation, including a review of the associated Quality Control documentation, we offer the following:

1. Reactor Trip Switchgear 1-CP-CP-111
 - a. Receiving inspection report was correct indicating that the Westinghouse identification was satisfactory.
 - b. The UE&C identification number on the stainless steel nameplate was attached to the switchgear. Furthermore, we verified, after the NRC inspections that the stainless nameplate was still attached.
 - c. The switchgear has not been turned over to Startup and review of the Procedure FEP-519 checklist showed that the identification nameplate attribute had not been signed off.

ATTACHMENT A

2. Reactor Trip Logic Panel Train B (front) 1-MM-CP-13
 - a. Receiving inspection report was correct indicating that the Westinghouse identification was satisfactory.
 - b. The UE&C identification number on the stainless steel nameplate was attached to the switchgear. Furthermore, we verified, after the NRC inspections that the stainless nameplate was still attached.
 - c. The logic panel has been turned over to STD with the permanent plant nameplate affixed to the panel.
 - d. The permanent plant nameplate is located on the rear of the panel which is not considered good practice and is not consistent with nameplates affixed to other electrical equipment. Therefore, another permanent plant nameplate shall be affixed to the front of this panel.

Locating the permanent plant nameplate on the rear of this panel appears to be an isolated incident based upon review of records and inspection of other panels installed in that area.

Corrective Action

1. Reactor Trip Switchgear 1-CP-CP-111

A Yankee Atomic Electric Co. Deviation Notice #076 was issued prior to the completion of our evaluation. However, the conclusion of our evaluation was that no corrective action was in fact required.

2. Reactor Logic Panel Train B 1-MM-CP-13

Pursuant to STD Work Request No. SSPS0093 a permanent plant nameplate was attached to the front of the panel on or about March 4, 1985.