

APPENDIX A

NOTICE OF VIOLATION

Public Service Company of New Hampshire
Seabrook Unit 1

Docket No. 50-443
License No. CPPR-135

As a result of the inspection conducted on July 8 - August 27, 1985 and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C) published in the Federal Register on March 8, 1984 (49 FR 8583) the following violations were identified:

- A. 10CFR50, Appendix B, Criterion III and the Seabrook Station FSAR, Section 17.1.1.3 require that the suitability of materials and processes essential to the safety-related functions of components be reviewed and that deviations from the appropriate quality standards be controlled. New Hampshire Yankee Procedure, ASP-3 (Revision 2), specifies the controls required when non-conformance report (NCR) dispositions are used as design changes, to include providing design details appropriate to the identified nonconforming conditions. UE&C NCRs 74/1903B and 74/2914B specify repair dispositions to the limit switch supports on three safety-related, safety injection (SI) valves.

Contrary to the above, as of July 19, 1985, repair work was completed to the three subject, safety-related valve limit switch supports (1-SI-V89, V90, & V93) using design details, as specified by NCRs 74/1903B and 74/2914B, which were inappropriate to the identified nonconforming conditions and which were unclear as to specifying the controls and standards necessary to assure the ability of the affected components to perform their safety-related functions. This lack of design change clarity resulted in the installation of material and welds in conflict with engineering intent and in the failure to apply the required quality assurance controls, including inspection, to safety-related work activities.

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

- B. 10CFR50, Appendix B, Criterion XVI and the Seabrook Station FSAR, Section 17.1.1.16 require that conditions adverse to quality be corrected. In the case of significant conditions adverse to quality, particularly those governed by 10CFR50.55(e) requirements, the corrective measures prescribe that the actions taken be documented and reported, as appropriate. Seabrook Project Policy No. 27 (Revision 3) specifies that in the reporting of 10CFR50.55(e) information, corrective action is verified to have been completed by the Construction QA organization prior to the issuance of a Final Report to the NRC. For a reportable 10CFR50.55(e) deficiency on the diesel generator exhaust silencer pedestal cracking, corrective action was specified to be the redesign and replacement of the original concrete pedestals with steel pedestals. The Final Report to the NRC, dated June 10, 1985, stated that the redesign and rework had been completed.

Contrary to the above, as of July 8, 1985, corrective action to the subject deficiency on the diesel generator exhaust silencer pedestal cracking had not been completed prior to the issuance of the Final Report to the NRC. Construction QA verification, in accordance with Project Policy No. 27, was inadequately

applied by relying only on documentation, in lieu of hardware, verification. The QA program for corrective measures was also inadequate, for this case, in not requiring that all safety-related work activities be examined and documented in accordance with quality control acceptance criteria. These inadequacies led to incomplete and unverified bolting work on the steel replacement pedestals at a time when QA documentation and the June 10, 1985 Final Report indicated the corrective action rework had been completed.

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

Pursuant to the provisions of 10 CFR 2.201, Public Service Company of New Hampshire is hereby required to submit to this office within 30 days of the date of the letter transmitting this Notice, a written statement or explanation in reply, including for each violation: (1) the corrective steps which have been taken and the results achieved; (2) the corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.