

March 6, 1990

To Dennis Rathbun  
From Henry Myers *HM*

Re: Seabrook Reactor Coolant Pump (RC) Support Leg

On or about February 19, I sent you a memorandum on this matter based on Section 2.1.5 of Inspection Report 50-443/90-80. The memorandum contained 19 questions which were addressed in a document you provided me on March 5. I requested Mr. Scott Schum to review the March 5 materials.

In response to my request, Mr. Schum provided information which is the basis for the questions attached hereto. We assume that NRC staff, pursuant to its responsibility to enforce the Commission's regulations, has an interest in the answers to these questions.

In addition to the attached questions, there is a question of whether the drawing you provided me describes accurately the as-built condition. They appear to be different. Why? What is the basis for believing this is an isolated case? What is the basis for a conclusion that there are not discrepancies between drawings and as-built conditions which result in a safety problem?

The questions we are bringing to your attention herein with regard to the Reactor Coolant Pump (RCP) support do not imply that we have information demonstrating that the RCP support was constructed in a manner as to result in an unsafe condition; we do believe, however, that the need to move the reactor coolant pump, the manner in which the design change was made, the documentation of the design change, the apparent discrepancy between the design and as-built configuration, and the cryptic fashion in which all this has been addressed could cause concern over the adequacy of design control at Seabrook and the manner in which the NRC monitored the situation.

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Questions relating to RCP responses.

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1. If the design of the RCP supports had incorporated in it the ability to move the support as stated, why was an ECA required in order to make the change?

Also if the design was such that the ability to move the supports was incorporated, why did it take three iterations of the ECA to get the change correctly incorporated?

2. Response #2 stated "The subject RCP support column base assemblies were installed, but not yet grouted and connected as designed to the existing anchor bolts." What does this mean? Does this explain the existence of the 6" x 6" plate washers that do not belong there?

3. What was the cause of the three changes to the ECA within thirty-one days? What lack of control was present in the process? Did any of these design changes call for the installation of the 6" x 6" washers that have been Discovered?

4. Considering all of the questioning, and concern that has been raised concerning the movement of the RCP support, why has the NRC been so consistently unconcerned in its answers to the individuals? The continued interest should have been enough to get the NRC to look at the supports and compare the installation with the design before 1990.

5. Response 5 states "A detailed NRC review of the design data providing the basis for acceptability of the design change was first conducted in 1987 and is documented in Inspection Report 87-07." How could a detailed review be conducted in response to an allegation and not include a physical inspection of the installation at the time? This inspection would (Or would it?) have revealed the installation that was not in accordance with the design.

6. Who was responsible for the actual installation of the RCP column base supports? While Westinghouse approved the design, were they responsible for the installation or was it actually accomplished by some other organization?

7. Explain how material used for the 6" x 6" Washers that were found to be installed, outside of the design can be traceable material. If the material was not installed in accordance with the design how can you trace the material to the correct installation, and purchase order? Where did the material come from? Why was it installed? Who installed it? How can the NRC accept so readily the installation of material that is not in accordance with the design? The material was apparently only located as a result of continued interest by this office and concerned citizens, why did the utility not identify this improper installation to the plant? What other material is installed in violation to the design at Seabrook?

8. How can the utility state that the 6x6 washer material is

appropriate to the application when the material is not supposed to be there? The material that by design is not to be installed has a difficult time being appropriate to the application.

9. Response XVIII details the use of portable testing equipment for the conduct of the original RCP vibration monitoring for the first test and the use of the installed, permanent plant vibration instrumentation for the second and later indication. Did these instruments provide correlating information? Was the information provided by the one compared to the information provided by the other? If so, what were the results? If not, why not? Would the fact that the frame vibration monitors for the RCP's were not installed correctly have been identified if this information had been compared? If so, why was nothing done until 1989?