

# NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY  
THE HARTFORD ELECTRIC LIGHT COMPANY  
WESTERN MASSACHUSETTS ELECTRIC COMPANY  
HOLYOKE WATER POWER COMPANY  
NORTHEAST UTILITIES SERVICE COMPANY  
NORTHEAST NUCLEAR ENERGY COMPANY

P.O. BOX 270  
HARTFORD, CONNECTICUT 06101  
(203) 666-6911

October 23, 1978

Mr. Robert T. Carlson  
Chief, Reactor Construction &  
Engineering Support Branch  
U. S. Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, PA 19406

QA-2898

Gentlemen:

Pursuant to the provisions of Section 2.201 of the NRC's "Rules of Practice" Part 2, Title 10, Code of Federal Regulations, this report is in reply to your Inspection Report 50-423/78-05. Our response follows the reported item of apparent noncompliance of the subject report.

### Infraction:

10 CFR 50, Appendix B, Criterion V requires in part, "Activities affecting quality ... shall be accomplished in accordance with these instructions, procedures, or drawings".

The Millstone Nuclear Power Station Unit 3 PSAR (Preliminary Safety Analysis Report) Section 17.1.1.9 requires that NUSCO contractors are responsible for developing and implementing procedures for the control of special processes such as welding, ... in accordance with applicable codes, standards, specifications and procedures.

Richmond Engineering Company Drawing D-74-412, Revision 9 specifies 1/4-inch size for the fillet weld on the access hatch for Boric Acid Tank No. RCN-204.

Contrary to the above, on August 18, 1978, the fillet weld on the access hatch for Boric Acid Tank No. RCN-204 was less than 1/4-inch size over approximately a six-inch length. This weld had been examined and accepted without identification and correction of the nonconforming condition.

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### Response:

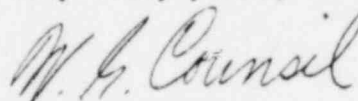
We are in agreement that the item of noncompliance with respect to the required dimensions of the weld are factual. We also agree that the Richmond Engineering Company had erroneously accepted this nonconforming condition. We are not in agreement that this item should be treated as an infraction by Northeast Utilities.

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Normal in process inspections were performed by Stone & Webster Field Quality Control Personnel on Richmond Engineering Company activities prior to this NRC inspection. Of the six inspections performed by Stone & Webster FQC prior to August 31, 1978, only two inspections were satisfactory. This provided a quality control index rating of 33%. The work covered by the NRC inspection had not been presented by Richmond Engineering Company for inspection by Stone & Webster. With an index rating this low, Stone & Webster, acting as Northeast Utilities agent, was well aware of potential problems with this fabrication. Although the referenced NRC inspection report disclosed the cited weld deficiency, a subsequent examination of records on September 8, revealed five additional unsatisfactory areas. On September 26, Stone & Webster FQC compiled a final inspection of all welds in accordance with specification requirements, (1144 linear feet in total). At this time, all outstanding inspections have been resolved including this weld repair. Both of the tanks were found to be satisfactory. It should also be noted that the tanks have not been code stamped and testing will not be completed for 1 1/2 to 2 years.

NU feels strongly that since the work had not been presented for final inspection and acceptance by Stone & Webster at the time of this inspection, this item should be categorized as unresolved rather than as a violation. We respectfully request that the NRC reconsider the classification of this item. As you will note in the above paragraphs, corrective action has been completed at this time.

Very truly yours,



W. G. Council  
Vice President

WGC/DGD/lab