

**SEABROOK STATION**  
**Engineering Office:**  
**20 Turnpike Road**  
**Westborough, MA 01581**

November 17, 1980

SBN-139  
T.F. B 4.2.7

U.S. Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

Attention: Office of Inspection and Enforcement

Subject: Combined Inspection No. 50-443/80-11 and 50-444/80-11

Dear Sir:

Pursuant to receipt of your correspondence regarding the results of the subject inspection, we offer the following reply:

NRC Notice of Violation: (80-11-03)

10 CFR 50, Appendix B, Criterion V, states in part that, "activities affecting quality shall be prescribed by documented instruction, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

The Seabrook Station PSAR states, in part, in paragraph 17.1.5 that: "Each organization is required to perform their respective quality related activities covered by this program in accordance with documented instructions, procedures or drawings. . ."

Weld procedures UE&C WS-4A and PDM W.5-2 contain requirements to clean surfaces prior to welding including the removal of paint, dirt and oil.

Contrary to the above, on September 17, 1980, the inspectors observed that welding of ring girder brackets to the bottom ring cylinder on the primary containment liner had occurred without first removing the paint coating.

This item is a deficiency applicable to Docket Nos. 50-443 and 50-444.

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Response:

Corrective Action Taken and Results Achieved

As noted in the subject report, corrective actions were established prior to the conclusion of the inspection, therefore, a response is not required.

Full compliance was achieved during the inspection.

Notice of Violation (80-11-02)

10 CFR 50, Appendix B, Criterion V, states in part that, "activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

The Seabrook Station PSAR states, in part, in paragraph 17.1.5 that: "Each organization is required to perform their respective quality related activities covered by this program in accordance with documented instructions, procedures or drawings." Also the Seabrook Station PSAR, Section 3, commits to the ASME B&PV Code, Section III (1977 Winter Addenda) for piping.

The ASME B&PV Code 1977 Edition with Winter Addenda, Subsection NC, Paragraph NC-4453.2 states in part, "The weld repair shall be made using welding materials, welders and welding procedures qualified in accordance with (by references) with NC-2400." NC 2400 states in part, "All welding material used in construction and repair of. .material. .shall conform to the requirements. . .permitted in Section IX."

ASME Section IX, requires, among other things that thickness and joint design are essential variables. In addition, Section IX states that for "GTAW" process, the deletion of a backing in the single welded butt joints is an essential variable.

Weld procedure specification 24-III-KI-12, Revision 2, containing these essential variables was indicated as being applicable to the weld repair on line CBS-1208-01 Field Weld F0103.

Contrary to the above, on September 17, 1980, a weld repair was made using a joint design not in compliance with the procedure, welded for a thickness greater than qualified by the procedure, and using a welder unqualified to the joint design used.

This item is an infraction applicable to Docket No. 50-443.

Response:

Corrective Action Taken and Results Achieved

The problem occurred when the welder in his efforts to perform a repair, ground, in stages, a cavity which resulted in a thru-wall depth of 0.406" for which he

was not qualified to weld. The repair procedure used was restrictive in the limits set on essential variables which were subsequently misapplied.

Pullman-Higgins (P-H) records dating back to their first repair (October 16, 1979) were reviewed to verify the measured depth of cavity vs. repair procedure thickness limits and the type of weld material issued. The records identified one additional weld (120101-02), in addition to the one identified in the subject report, which experienced a thru-wall repair. Repair welds have been radiographed and show acceptable results.

To prevent recurrence of this situation the following will be accomplished by P-H:

1. The repair procedure requiring an insert will be requalified to increase the thickness range expected to be experienced at the site.
2. Future thru-wall repairs will be made by qualified welders utilizing an open butt weld procedure which does not incorporate an insert. The applicable P-H procedure will be requalified to increase the thickness range.

The two thru-wall repairs have been incorporated into a P-H nonconformance report which requests an engineering disposition.

Full compliance will be achieved by December 15, 1980.

NRC Notice of Violation (80-11-01)

10 CFR 50, Appendix B, Criterion IX, states, in part, that: "Measures shall be established to assure that special processes, including welding. . and nondestructive testing are controlled. . .in accordance with applicable codes."

The Seabrook Station PSAR, Section 3, commits to the ASME B&PV Code Section III (1977 Winter Addenda) for piping.

The 1977 Edition, with Winter Addenda, Subsection NCA, Paragraph NCA 4134.9(b) states, in part: "Process sheets, checklists. .shall be prepared. .with space provided for reporting results of completion of specific operations at check-points of fabrication. . . .These documents shall include spaces for the signature, initials or stamp of the representative of the Certificate Holder..."

Contrary to the above, during this inspection, it was noted that the process sheets for repair of weld F0103 on line CBS-1208-01 omitted a visual examination of the weld after weld repair.

This item is an infraction applicable to Docket No. 50-443.

Response:

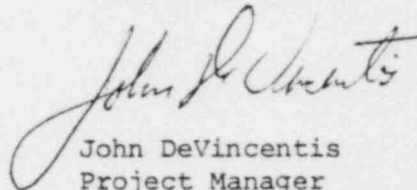
Corrective Action Taken and Results Achieved

This noncompliance is similar to that identified as Infraction 80-04-03. At that time the identified deficient records were corrected, however, records completed previous to that NRC inspection inadvertently were not reviewed.

Pullman-Higgins has made a complete review of their records and all repair welds have been identified. These welds will be subjected to the required final visual inspection.

Corrective action will be completed by December 15, 1980.

Very truly yours,



John DeVincentis  
Project Manager

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