PSNH PUBLIC SERVICE
Company of New Hampshire

SEABROOK STATION
Engineering Office:
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Framingham, Massachusetts 01701
(617) - 872 - 8100

April 10, 1981

SBN-156
T.F. B4.2.7

United States Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Attention: Office of Inspection and Enforcement

Subject: Combined Inspection Nos. 50-443/81-02 and 50-444/81-02

Dear Sir:

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

NRC Notice of Violation (81-02-03)

10CFR50, Appendix B, Criterion V states, in part, that: "Activities affecting quality shall be...accomplished in accordance with (the prescribed) instructions, procedures, or drawings."

The Seabrook Station PSAR for Units 1 and 2 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."

United Engineers and Constructors (UE&C) Specification 006-18-1, Revision 5, states in part in paragraph 4.2.2, that: "Anchor bolts with nominal sizes greater than 2 inches in diameter shall be examined by magnetic particle on the final machined parts."

Contrary to the above, as of February 9, 1981, the eight 3-inch diameter anchor bolts included as part of the Embedded Reactor Supports (ERS-1 and ERS-2), were installed and partially embedded without a magnetic particle examination having been conducted on the threaded bolt lengths.

This is a severity Level V violation (Supplement II).

The violation was caused by ambiguous requirements contained in UE&C Specification 9763.006-18-1. Section 4.2.2 of that procedure requires all safety and non-safety anchor bolts with nominal size greater than 2 inches in diameter to be examined by magnetic particle inspection on the final machined parts. UE&C did not differentiate between "anchor bolts" and "studs" on the specification. The vendor assumed that Section 4.2.2 referred to typical

anchor bolts which they understood to be rods embedded in concrete to an anchoring structure. The subject studs are bolted to a plate of a fabricated assembly embedded in concrete, hence the vendor did not perform the required magnetic particle inspection. The UE&C vendor surveillance representative made a similar misinterpretation of the specification. The latter resulted in the material being accepted by UE&C Vendor Surveillance and Receiving Inspection at the site since the Check Plan confirmed that all requirements were met by the vendor.

The exposed threads on the subject bolts were subsequently magnetic particle inspected at the site and the results were acceptable.

Since there is only one supplier to UE&C for anchor bolt materials this problem should not be encountered with other vendors.

The following actions have been taken to prevent recurrence of this problem:

1. The Vendor Surveillance Check Plan has been modified to include surveillance points witnessing of magnetic particle inspection during fabrication and verification of completion of NDE prior to shipment.

2. Specification 9763.006-18-1 will be revised to clarify ambiguous terms.

3. UE&C Engineering is performing an on-going review of structural drawings to verify that NDE requirements are included.

4. Data packages for achor bolts will contain a certification that all anchor bolts have received proper NDE and that all reports are included.

Full compliance was achieved on April 9, 1981.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY

W. P. Johnson
Vice President

COMMONWEALTH OF MASSACHUSETTS)
)ss
MIDDLESEX COUNTY )

Then personally appeared before me, W. P. Johnson, who, being duly sworn, did state that he is a Vice President of Yankee Atomic Electric Company, that he is duly authorized to execute and file the foregoing request in the name and on the behalf of Public Service Company of New Hampshire, and that the statements therein are true to the best of his knowledge and belief.

Armand R. Soucy Notary Public
My Commission Expires September 7, 1984