

SEABROOK STATION
Engineering Office:
1671 Worcester Road
Framingham, MA 01701

July 31, 1981

SBN - 177
T.F. B 5.3.99

United States Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Mr. Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

References: (a) Construction Permits CPPR-135 and CPPR-136, Docket Nos.
50-443 and 50-444
(b) USNRC Generic Letter 81-21 dated May 4, 1981,
"Qualification of Inspection, Examination, and Testing and
Audit Personnel"

Subject: Response to USNRC Generic Letter 81-21

Dear Mr. Eisenhut:

As you are well aware, Seabrook Station Unit 1 and Unit 2 are under construction. The scheduled construction completion for Unit 1 is approximately 28 months from the date of this letter. Therefore, our response to Reference (b) will address only the construction stage for Seabrook. The Seabrook FSAR will address activities during the preoperational testing, startup and operational phases which are still under development.

Public Service Company of New Hampshire Seabrook QA personnel who perform the inspections, examinations or test functions as specified in Regulatory Guide 1.58, Revision 1 - September 1980, will be certified in accordance with the provisions of ANSI N45.2.6-1978 subject to regulatory positions C.5, C.6, C.7, C.8 and C.10 of Regulatory Guide 1.58, Revision 1. Please note that during the construction phase, inspections and examinations are primarily performed by the NSSS vendor (Westinghouse) or contractors for the construction managers (United Engineers and Constructors). Westinghouse complies with the provisions of Regulatory Guide 1.58, Revision 0 with the clarifications and alternatives identified in their approved Topical Report WCAP-8370, Revision 9. UE&C and site contractors comply with the provisions of Regulatory Guide 1.58, Revision 1 as follows:

The requirements of ANSI N45.2.6, "Qualification of Inspection, Examination, and Testing Personnel for the Construction Phase of Nuclear Power Plants," are complied with for the BOP by requiring that all contractors and fabricators meet the requirements of SNT-TC-1A, "Recommended Practice for Nondestructive Testing Personnel Qualification



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and Certification." All personnel engaged in the performance or evaluation of nondestructive examination were qualified in accordance with SNT-TC-1A.

Qualification requirements for other than nondestructive examination personnel were complied with, with the exception of:

- a. Several of the vendors who contracted to produce items prior to the imposition of ANSI N45.2.6 in procurement documents. These vendors had satisfactory alternate qualification programs.
- b. Revision 1, Position 6 of this Regulatory Guide requires a High School Graduate or having earned a General Education Development equivalent for all levels. We have allowed experience, and on the job training in lieu of this requirement

Regarding Regulatory Guide 1.146, Revision 0 - August 1980, Seabrook Station QA procedures will be revised by August 1, 1981, and Seabrook audit personnel will be recertified to the provisions of this Regulatory Guide. United Engineers and Constructors and Westinghouse also comply with this Regulatory Guide. United Engineers has also imposed this Regulatory Guide on all major site contractors. We do not anticipate imposing the provisions of this Regulatory Guide upon suppliers.

Very truly yours,


for: John DeVincentis
Project Manager

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