

New Hampshire Yankee

NYN-91080

May 17, 1991

United States Nuclear Regulatory Commission
Washington, DC 20555

Attention: Document Control Desk

- References:
- (a) Facility Operating License No. NPF-86, Docket No. 50-443.
 - (b) Transcribed Public Meeting Between New Hampshire Yankee and the NRC conducted on April 10, 1991.
 - (c) NHY Letter NYN-91076 dated May 13, 1991, "Transmittal of the Program Description for the Reverification of Pullman-Higgins Field Weld Records", T. C. Feigenbaum to T. T. Martin.

Subject: Report of Weld Record Anomaly For Field Weld 1-CS-318-02-F0202

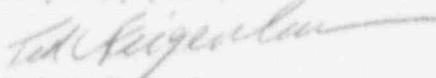
Gentlemen:

In the April 10, 1991 Public Meeting between New Hampshire Yankee (NHY) and the NRC [Reference (b)], and as provided in the NHY Program Description for the Reverification of Pullman-Higgins Field Weld Records, transmitted to the NRC on May 13, 1991 [Reference (c)], NHY agreed to provide the NRC with a written report of any weld record anomalies within 72 hours of the determination that a report is required. Accordingly, enclosed please find a "Report of Weld Record Anomaly for Field Weld 1-CS-318-02-F0202". This report relates to a records anomaly which NHY determined on May 14, 1991, was reportable pursuant to the program description.

As provided in the Enclosure, the identified anomaly is related to a single weld record in that it pertains to a lack of administrative information on one piece of radiographic film. NHY has evaluated this records anomaly and has determined that it does not adversely affect or call into question the physical quality of weld 1-CS-318-02-F0202 or other Seabrook Station welds. Corrective actions to address this anomaly will be completed by May 17, 1991. The Justification for Continued Operations contained in the Enclosure has been reviewed by the Station Operation Review Committee (SORC).

Should you have any questions regarding this matter, please contact Mr. Neal A. Pillsbury, Director of Quality Programs at (603) 474-9521, extension 3341.

Very truly yours,


Ted C. Feigenbaum

TCF:JES/tad

Enclosure

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ADD 1

United States Nuclear Regulatory Commission
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May 17, 1991
Page two

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New Hampshire Yankee
May 17, 1991

ENCLOSURE 1
REPORT OF WELD RECORDS ANOMALY FOR FIELD WELD 1-CS-318-02-F0202

REPORT OF WELD RECORD ANOMALY

FOR FIELD WELD 1-CS-318-02-F0202

I. Introduction

In the April 10, 1991 Public Meeting between New Hampshire Yankee (NHY) and the NRC, and as provided in the NHY Program Description for the Reverification of Pullman-Higgins Field Weld Records, transmitted to the NRC on May 13, 1991, NHY agreed to provide the NRC with a written report of any weld record anomalies within 72 hours of the determination that a report was required. Accordingly, the following is a report of an identified records deficiency. NHY determined that this anomaly required NRC notification on May 14, 1991, at 12:30 P.M.

The identified deficiency is solely related to weld records in that it pertains to a lack of information on one piece of radiographic film. NHY has evaluated this records deficiency and has determined that it does not adversely affect or call into question the physical quality of weld 1-CS-318-02-F0202 or other Seabrook Station welds at this time. The following provides the code requirements, a description of the identified deficiency, cause of the deficiency, corrective actions which are to be implemented, and a justification for continued operation regarding the identified deficiency.

II. Code Requirements

Section V of the ASME Boiler and Pressure Vessel Code, entitled "Nondestructive Examination" provides the code requirements for information which is to be maintained on radiographic film. Specifically, paragraph T-236 entitled "System of Identification," states that "[a] system shall be used to produce permanent identification on the radiograph traceable to the contract, component, weld or weld seam, or part numbers as appropriate. In addition, the Manufacturer's symbol or name and the date of the radiograph shall be plainly and permanently included on the radiograph. This identification system does not necessarily require that the information appear as radiographic images."

III. Description of the Deficiency

Fullman-Higgins field weld 1-CS-318-02-F0202 is a circumferential butt weld on a three inch diameter section of piping in the Chemical Volume and Control System (CVCS). This section of the CVCS system is ASME III, Class 2, and Safety Class 2. This weld connects a valve (V-325) to the piping and is also adjacent to a reducer. This weld is located in the letdown leg of the CVCS system downstream of both the Regenerative (Tag number E-2) and Letdown (Tag number E-4) Heat Exchangers. This weld is physically located in the Primary Auxiliary Building which is outside the Containment Building. (Reference NHY P&ID 1-CS-D20722). This field weld was radiographed in 1981 in accordance with the Non Destructive Examination (NDE) requirements contained in the 1977 Edition of ASME Section III up through and including the Winter 1977 Addenda (the code applicable to Seabrook Station).

The weld records package for weld 1-CS-318-02-F0202 contains a Radiograph Inspection Report (RIR) and the radiographic film. The RIR indicates that the radiograph views for

all stations of this weld are of acceptable quality. The RIR also contains the approval signatures of the Level II Pullman-Higgins reviewer, Authorized Nuclear Inspector (ANI), and the Yankee Atomic Electric Company (YAEC) reviewer. Additionally, another Level II Pullman-Higgins reviewer subsequently reviewed this RIR. At the time this radiograph was reviewed, the ASME Code approval process included the Level II Pullman-Higgins reviewer and the ANI. YAEC provided a review in order to satisfy Quality Assurance Program requirements. Level III Pullman-Higgins review was added to the review process at a later point and therefore is not a requirement for this field weld.

As required by ASME V including paragraph T-236, NHY contains the Radiograph Inspection Report (RIR) and the radiographic film for this weld. The RIR and the radiographic film for two of this weld's three stations (stations 0 and 1), contain the code required information and approvals. As identified in NHY Corrective Action Request (CAR) 91-005, the radiographic film for station 2 lacks the identification of the exposure date, system/line/isometric number, weld number, and manufacturer's identification. The only information contained on this film is the station number. Therefore, the film for station 2 does not meet the code requirements.

NHY Nuclear Quality Group personnel have verified that the radiographic film for station 2 is in fact that of weld F0202. Comparison of the film for station 2 with that of stations 0 and 1, indicates unique weld profile is present on all the film for three stations. Specifically, at the time this radiograph was taken there was a spool identification tag tack welded to the pipe near this location which is oriented in a position that provides a unique identifier common to all three stations. Additionally, this weld is located near a reducer which also can be identified on the film for all three stations. This radiographic film comparison was performed by a NHY Level II RT reviewer on May 9, 1991.

NHY Nuclear Quality Group personnel have also verified that the film reviewed for weld F0202 is the only film available for this weld. Review of the weld process sheets indicates that only one repair was made to this weld before the weld was radiographed. This repair was on the root pass (first weld layer) of the weld. A visual examination of this pass detected a flaw which required a repair. No other repairs were made prior to or after radiographic examination. As a result of the above reviews, NHY has determined that the station 2 film is of Pullman-Higgins field weld 1-CS-318-02-F0202.

IV. Cause of Deficiency

NHY has reviewed the identified deficiency and has determined its cause to be personnel error on the part of Pullman-Higgins NDE personnel. The Pullman-Higgins NDE personnel apparently neglected to place the required field weld identification tag on the radiographic film for this specific station when the film was developed. Identification of radiographic film as required by code was an explicit provision of the Pullman-Higgins Radiographic Procedure 1X-RT-1-W77.

V. Corrective Actions

NHY has determined that the appropriate short-term corrective actions for this records deficiency are to: 1) permanently identify the code required information on the station 2 film for weld 1-CS-318-02-F0202; and 2) reference the CAR on the film package for this weld. Actions 1 and 2 above are specifically allowed for by the Code (T-236), and once

completed they will ensure compliance with the code. NHY will complete these corrective actions by May 17, 1991.

If similar anomalies are found during the conduct of the balance of the Weld Records Reverification Project, long-term corrective actions will include the evaluation of such anomalies, as a group, for generic implications and possible additional corrective actions.

VI. Justification for Continued Operation

The following provides a Justification for Continued Operation (JCO) of Seabrook Station for the time period between the determination that the aforementioned weld records deficiency required NRC notification and the time that corrective actions for the deficiency are implemented. This JCO demonstrates that the identified weld records deficiency does not produce any reduction in the protection provided for the health and safety of the public.

As provided in Section III above, NHY has conclusively determined that radiographic film is available for all three stations of Pullman-Higgins field weld 1-CS-318-02-F0202. As indicated on this weld's Radiograph Inspection Report, the radiograph film at all three stations indicates that this weld is of acceptable quality. Based on this, there are no outstanding questions regarding the quality of this field weld and thus no outstanding questions regarding the integrity of the Chemical Volume and Control System. Additionally, the CVCS system has been extensively tested during preoperational and startup testing. Moreover, this system has been operating for the past year. Throughout testing and operation, no problems with this weld have been identified. Since the identified records deficiency does not compromise the integrity of Seabrook Station, there is no reduction in the protection provided for the health and safety of the public.

NHY has also performed a safety evaluation for this JCO and has determined that an unreviewed safety question does not exist. Specifically, since the identified records deficiency does not compromise the integrity of the CVCS system, it does not increase the probability or consequences of accidents or malfunctions previously evaluated in the Final Safety Analysis Report (FSAR). The mere presence of a records deficiency does not introduce a new failure mechanism nor does it modify the plant in any manner so as to create the possibility of a new accident or malfunction occurring. This record deficiency does not provide any means for an increase in the dose from any previously analyzed accident as it does not make any changes to the plant or its design basis. The margin of safety as defined in the basis for any technical specification will not be reduced by this records anomaly since it does not compromise the integrity of the CVCS.

Based on the foregoing, the identified records deficiency does not present an unreviewed safety question and it does not compromise the integrity of Seabrook Station. Thus, this records anomaly does not reduce the protection provided for the health and safety of the public.