



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

October 19, 1990

The Honorable Morris K. Udall, Chairman
Committee on Interior and Insular Affairs
United States House of Representatives
Washington, DC 20515

Dear Mr. Chairman:

Enclosed, at the request of Dr. Henry Myers of your staff, are responses
to his request of August 15, 1990, concerning Seabrook welds.

Sincerely,

A handwritten signature in cursive script that reads "Dennis K. Rathbun".

Dennis K. Rathbun, Director
Congressional Affairs
Office of Governmental and
Public Affairs

Enclosures:
As Stated

cc: The Honorable Don Young

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Response to Dr. H. Myers's Requests of August 15, 1990

A response to Dr. Myers's request XXXIV (8/15/90) is provided below. This request for information was issued to the staff prior to the August 28-29, 1990 meeting at the Seabrook station. The meeting was held at the site between the IRT, NRC management and the Congressional staff to discuss issues related to the welding program at Seabrook. It should be noted that many of these requests were thoroughly addressed by the team during this 2-day site visit at Seabrook with Dr. Myers and other Congressional staff members. Consequently only brief responses are provided below, each directing attention to the NUREG-1425 where appropriate.

Request 1

..Please provide a listing of NCRs that the team observed to have resulted from the YAEC overview program...

Response:

The IRT observation on page 2-3 of NUREG-1425 was based on a review of approximately 300 NCRs. A specific list of the NCRs resulting from YAEC review of radiographic film was not compiled by the IRT as it was not considered necessary to support this observation. The review of these NCRs was conducted during the course of the overall assessment, as discussed in Sections 2, 3, 4, 8, 9, 10, 12, 13, 14, 15, 16, 17, and 18 and in Appendices 5, 6, 7, 8, 9, 10, and 11 of NUREG-1425. The majority of the NCRs reviewed by the team are identified in these sections and appendices, although not all of the NCRs reviewed were identified in NUREG-1425.

Request 2

...Please inform me as to whether the authors of NUREG-1425 intended to state that a significant breakdown did or did not occur with regard to P-H compliance with 10 CFR 50, Appendix B...

Response:

While the team agrees, as discussed in the Executive Summary of NUREG-1425, the failure of P-H to identify and correct film and weld deficiencies in a timely manner constitutes a violation of NRC requirements, the team does not agree that this violation represents a significant breakdown. The fact

that the YAEC QA surveillance program identified the deficiencies and caused corrective actions to be initiated, indicates the licensee's QA program functioned in accordance with the requirements of was in general compliance with 10 CFR 50 Appendix B.

Request 3

Information contained in the NUREG-1425 table on p. 14-2 plus information provided in your August 2 response to Seabrook Welds XXIX, dated July 13, indicates that the NUREG-1425 authors had found that YAEC had identified only 2 "film-quality rejects/discrepancies," zero "weld-quality rejects," and 3 "administrative-type rejects/discrepancies" in the total of some 1673 weld packages reviewed by YAEC prior to December 1983. This leads to the following questions:...

Response:

During the meeting between the IRT and Congressional staff members on August 28 and 29 at the Seabrook site, the table on page 14-2 of NUREG-1425 and the team's understanding of the contents, inputs and accuracy of the table were thoroughly discussed with the Congressional staff members. As explained in the NUREG, and discussed in detail on August 28 and 29, the IRT found that YAEC had identified more rejects than those listed in the table (both prior to December 1983 and afterwards). The basis for the percentage of radiographic film rejects listed in this table was data tabulated by the licensee (at the team's request because of congressional staff interest) from DRs and DNs generated by YAEC during the period mid-1982 through 1986. Similar reject data from the YAEC overview program before mid-1982 (documented in individual surveillance reports), from November 1983 forward (documented on CSLs) and from the YAEC audit program were reviewed by the IRT but were not included in this table. This information is discussed on page 14-1 (before the table) and on page 14-2 (after the table).

Request 4

...How do the NUREG-1425 authors reconcile the foregoing statement with the table on p. 14-2 (in conjunction with your response to Seabrook Welds XXIX) which, as stated above, indicates that prior to December 1983 YAEC had identified only 2 "film-quality rejects/discrepancies," zero "weld-quality rejects," and 3 "administrative-type rejects/discrepancies" in the total of some 1673 weld packages reviewed by YAEC prior to December 1983?

Response:

See response to Request 3. As stated above, explained in NUREG-1425 and discussed during the meeting on August 28 and 29, the table on page 14-2 of NUREG-1425 does not represent all of the problems experienced by P-H regarding the welding program, especially during the pre-1983 timeframe.

Request 5

...The authors of NUREG-1425 were apparently unable to determine the reject rates for the period prior to December 1983. Again (unless the authors of NUREG-1425 believe that prior to December 1983, the real number of deficiencies identified by the AEC reviews consisted of 2 "film-quality rejects/discrepancies," zero welds-quality rejects," and 3 "administrative-type rejects/discrepancies out of the total of some 1673 weld packages reviewed by AEC prior to December 1983) the following questions need to be answered in light of the NRC's limited ability to review the data:

- a. Since the NRC appears to have been unable to identify the records which described the deficiencies identified by the AEC reviewers prior to December 1983, what was the basis for the NUREG-1425 authors' statement that with the exception of the missing YRT's, "...the team had no problems with the documentation of the AEC surveillance program?"
- b. In the absence of pre-December 1983 data concerning the results of the AEC reviews, what was the basis for the conclusion that:

...only a fraction of a percent was for weld defects. The large majority of the discrepancies were due to poor film quality and administrative defects?

Response:

The information contained in the table on page 14-2 of NUREG-1425 and its significance are discussed in response to request 3. The basis for the statements referred to in (a) and (b) of this request (#5) was not just a review of the information in the Table but the team's review of licensee surveillance reports, audit reports (YAEC & P-H), DRs, DNS, NCRs and Controlled Speed Letters dating from 1979 to 1985. Additional information was gained through discussions with licensee personnel.

Request 6

The NUREG-1425 Executive Summary contains the following

statement:

...the licensee properly identified and resolved most of the welding problems that arose during the construction period. [Underline added.]

What do the authors mean by "most?" Do the authors have reason to believe that some problems were not resolved? What welding problems might not have been resolved?

Response:

The partial statement in question comes from an executive level characterization of the team's overall findings regarding its review of weld control packages and associated records, as discussed in Sections 9 and 10 and Appendices 6 and 7. Use of the word "most" was believed by the team to be an accurate description of its overall findings in this area. The team is not aware of any welding problems that were not resolved.

Request 7

The NUREG-1425 Executive Summary contains the following statement:

The audit and surveillance programs provided an adequate QA overview; they were active throughout construction, generally identifying problems and obtaining corrective actions. [Underline added.]

What do the authors mean by "generally identifying?" Do the authors have reason to believe that some problems were not identified? What might be the nature of any such problems?

Response:

The statement in question comes from an executive level characterization of the team's overall findings regarding its review of the quality assurance audit and surveillance programs, as discussed in Sections 2 and 3 and Appendix 8 of NUREG-1425. Use of the words "generally identifying" was believed by the team to be an accurate description of its overall findings in this area. The team is not aware of any problems (other than those it identified and documented in NUREG-1425) that were not identified.

Request 8

The NUREG-1425 Executive Summary contains the following statement:

The findings from these programs supported the team's conclusion that, at least through the 1983 period, a P-H continued to experience problems in fabrication and NDE of pipe welds. These problems for the most part, were administrative-type mistakes involving weld records and RT technique problems.

The foregoing excerpt implies that the authors made a comparison between problems involving fabrication, problems involving record keeping and problems involving RT. What did the authors mean when they stated that the problems were for the most part "administrative-type mistakes involving weld records" or "RT technique problems?"

Response:

The statement in question represents an executive level characterization by the team of its assessment of findings from these programs in comparison with the team's overall findings from the broadly based review, as described in NUREG-1425 Executive Summary (page 5). The statement was not intended to represent a comparison between problems of different types.

CONGRESSIONAL CORRESPONDENCE SYSTEM
DOCUMENT PREPARATION CHECKLIST

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3. DOCUMENT CONTROL Sensitive (NRC Only) Non-Sensitive
4. CONGRESSIONAL COMMITTEE and SUBCOMMITTEES (if applicable)

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- (a) _____
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6. SOURCE OF DOCUMENTS

- (a) 5520 (document name _____)
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8. COMMENTS

