

APPENDIX A  
NOTICE OF VIOLATION

Public Service Company of New Hampshire  
Seabrook Unit 1

Docket No. 50-443  
License No. CPPR-135

As a result of the inspection conducted June 21 - July 2, 1982, and in accordance with the NRC Enforcement Policy, (10 CFR 2, Appendix C) published in the Federal Register Notice 47 FR 9987 (March 9, 1982), the following violations were identified:

- A. 10 CFR 50, Appendix B, Criterion V requires that activities affecting quality shall be prescribed by and performed in accordance with documents which include appropriate acceptance criteria. UE&C Corporate Standard No. II-3 "Qualification and Certification of Inspection, Testing and Surveillance Personnel" requires that the qualification of such personnel shall be documented in an appropriate form which includes the activities they are qualified to perform.

Contrary to the above, as of June 30, 1982, Certification of Level 2 surveillance personnel failed to identify the discipline or activity for which they were qualified.

This is a Severity Level V violation (Supplement II) applicable to Docket No. 50-443.

- B. 10 CFR 50, Appendix B, Criterion V requires that activities affecting quality shall be prescribed by documents which include appropriate acceptance criteria.

Contrary to the above, on June 21, 1982, waterstops installed in the walls of Unit 2 fuel storage building were observed to have encroached on the reinforcing steel and the pertinent drawings and specifications provided no specific installation requirements.

This is a Severity Level V violation (Supplement II) applicable to Docket No. 50-443.

- C. 10 CFR 50, Appendix B, Criterion III states that design control measures shall provide for verifying or checking the adequacy of design. The verifying or checking process shall be performed by individuals other than those who performed the original design, and the design changes shall be subject to design control measures commensurate with the controls applied to original design.

Contrary to the above, on July 2, 1982, Engineering Change Authorizations were initiated, dispositioned, and approved by one individual on more than one occasion, and a Request for Information containing design change information was issued without proper verification, checking, or review.

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This is a Severity Level IV violation (Supplement II).

- D. 10 CFR 50, Appendix B, Criterion III states that design control measures shall provide for verifying or checking the adequacy of design. The design changes, including field changes, shall be subject to control measures commensurate to the original design, and be approved by the organization that performed the original design.

Contrary to the above, on July 2, 1982, Nonconformance Reports containing design change information were not reviewed for technical adequacy of dispositions ("accept-as-is"; "repair") by original design group.

This is a Severity Level IV violation (Supplement II).

- E. 10 CFR 50, Appendix B, Criterion VI states that measures shall be established to control the issuance of documents affecting quality such that they are distributed to and used at the location where the prescribed activity is performed.

Contrary to the above, on June 30, 1982, the ECA change log (Log #8) issued on June 23, 1982 was not distributed and was not in use by project personnel at the controlled drawing station.

This is a Severity Level IV violation (Supplement II).

- F. 10 CFR 50, Appendix B, Criterion IX requires that Measures shall be established to assure that special processes, including welding, are controlled and accomplished by qualified personnel using qualified procedures in accordance with applicable codes, ... ASME Section III NA-4133.9 directs that welding be controlled in accordance with the rules of this Section and be accomplished by qualified personnel using qualified procedures. ASME Section IX QW-100.1 states in part, "The WPS is intended to provide direction for the welder."

Contrary to the above, during the period June 21 to July 2, 1982, P-H welders and welding foremen were found not to be knowledgeable of nor trained in the ASME WPS documents.

This is a Severity Level IV violation (Supplement II).

- G. 10 CFR 50, Appendix B, Criterion XVIII requires that followup action, including reaudit of deficient areas, shall be taken where indicated. The ASME III Code, paragraph NA-4133.8 requires that followup action, including reaudit, be made of deficient areas. Pullman Power Products Corporate Field Nuclear QA Program Manual, ASME Section III, Division I, dated March 1, 1982, paragraph 18.6.1, states, "Whenever deficiencies are noted in an audit report, immediate corrective action shall be initiated."

Contrary to the above, during the period June 21 through July 2, 1982, a review of Pullman-Higgins Internal Auditing Reports Nos. 7035-1-81, 7035-2-81 and 7035-1-82 disclosed that two successive audits identified weld monitoring as deficient. The third audit failed to followup these audit findings.

This is a Severity Level IV violation (Supplement II).

- H. 10 CFR 50, Appendix B, Criterion XVI requires that in the case of significant condition adverse to quality the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition. United Engineers and Constructors Quality Assurance Program, Section 17.1.13, requires that handling and storage instructions shall provide for protective environment to prevent damage or deterioration of the material or equipment. Westinghouse Nuclear Service Division Manual, Volume II, requires electrical equipment be placed in "B" level storage with special attention to preventing dust and dirt from entering the equipment.

Contrary to the above, on June 24, 1982, the Westinghouse electrical equipment stored in place at the 75 foot elevation of the control building and the "A" and "B" level warehouses was not being maintained in a "B" level configuration and dust and dirt had infiltrated the equipment. These conditions were identified in Nonconformance Report No. 843, dated February 20, 1981, but corrective actions did not preclude recurrence.

This is a Severity Level IV violation (Supplement II).

- I. 10 CFR 50, Appendix B, Criterion IX, requires that nondestructive testing be controlled and accomplished in accordance with applicable codes and specifications. Pullman-Higgins procedure, IX-RT-1-W77, Revision 3, invokes the ASME Section III Code, NC 5320 for acceptance criteria for radiography. ASME Section III Code, NC 5320, states that the following types of discontinuities are unacceptable: Incomplete fusion or lack of penetration.

Contrary to the above, on June 29, 1982, field weld CS-369-10 F1006 was reexamined by radiography and found to contain incomplete fusion.

This is a Severity Level IV violation (Supplement II).

Pursuant to the provisions of 10 CFR 2.201, Public Service Company of New Hampshire is hereby required to submit to this office within thirty days of the date of this Notice, a written statement or explanation in reply, including: (1) the corrective actions which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.

The responses directed by this notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Dated           AUG 24 1982          

**Original Signed By:** *S. D. Eberfor*

Thomas T. Martin, Director  
Division of Engineering and  
Technical Programs

APPENDIX B

SIGNIFICANT PROGRAM WEAKNESSES

Public Service Company of New Hampshire  
Seabrook Unit 1

Docket No. 50-443  
License No. CPPR-135

As a result of the inspection conducted June 21 - July 2, 1982, the following significant program weaknesses were identified in the implementation of your design and construction programs:

1. Contractor Interface Incident Reports are used to initiate design control documents such as Engineering Change Authorizations and Nonconformance Reports. There is no positive control to assure that these documents are issued.
2. Site staff engineering is responsible for evaluating Nonconformance Reports for reportability under 10 CFR 50.55(e). Interviews conducted with six staff engineers in two disciplines disclosed that they were not familiar with the criteria for reportability.
3. Nonconformance Report trending is performed by United Engineers and Constructors for recurring adverse conditions. The trend analysis does not consider reports beyond the preceding month.
4. Audit reports of the piping subcontractor revealed several specific problems which, when viewed collectively, indicated a programmatic weakness. These were identified by the licensee's audit program circa mid-1981. Although efforts to resolve these problems have been initiated, they have been ineffective.
5. The electrical subcontractor has developed procedures to train supervisors and foremen who work with safety related equipment, however, the procedure permits them to begin working before they have completed the training.

Dated                     AUG 24 1982                    

Original Signed By                     S. D. Shetterfor                      
T. T. Martin, Director  
Division of Engineering and  
Technical Programs