



SEABROOK STATION
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December 14, 1982
SBN-406
T.F. Q2.2.2

United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Attention: Mr. Richard W. Starostecki, Director
Division of Resident and Project Inspection

References: (a) Construction Permit CPPR-135 and CPPR-136, Docket
Nos. 50-443 and 50-444
(b) Telecon of November 10, 1982, A. L. Legendre (YAEC) to
Eugene Kelley (NRC Region I)

Subject: Interim CFR50.55(e) Report; Cold Pulling of Pipe

Dear Sir:

On November 10, 1982, we reported a potential 10CFR50.55(e) item regarding the potential for pipe and component overstress due to exceeding pipe pulling limits during welding fit-up.

It has been determined that this item is reportable under 10CFR50.55(e). The following information is provided per the interim reporting provision of 10CFR50.55(e)(3).

A. Description of Deficiency

An isolated incident of violation of UE&C specification for Assembly and Erection of Piping and Mechanical Equipment, #9763-006-248-51, Paragraph 3.5.8, has initiated further investigation of a potential generic problem. The UE&C specification contains a pulling limit of 1/8 inch on pipe spools which are to be fit-up for welding. The Pullman-Higgins pipe installation procedure, as written, allows the use of mechanical clamps which may pull a pipe more than 1/8 inch which could result in a potential overstressing of components.

B. Analysis of Safety Implications

If excessive misalignments existed in the fit-up of code piping, safety related components (piping, valves, fittings, etc.) could possibly be overstressed. In order to preclude this possibility, all safety related piping installed will be reviewed in the following corrective action:

C. Corrective Action Taken

1. The nonconformance report for the specific case was dispositioned to "rework" following an installation procedure and a reanalysis of the piping. This action is complete.

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2. In order to assure proper installation in the future an Engineering Change Approval was issued to immediately require the following in Specification 9763-006-248-51:
 - a. Paragraph 3.5.8.4 (added)
Installation Procedures shall establish a hold point at the installation of the final spool piece. Adjacent piping shall be verified as to being in the design configuration as shown on the drawings and spool piece shall be fit into position as verification that the requirements of paragraph 3.5.8 are not violated.
 - b. Paragraph 3.5.8.5 (added)
When tooling restraints are used, as permitted by paragraph 3.5.8.1, on the final closure weld of any system or portion thereof, verification of having met the requirements of paragraph 3.5.8 shall be performed, prior to making the weld.

The above items (a and b) are complete.
3. Pullman-Higgins (the installation contractor) procedures are currently being reviewed and revised to incorporate the above requirements. The affected procedures are scheduled to be submitted to UE&C for approval by December 22, 1982.

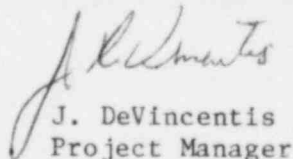
Retraining of pipe fitters, supervisors, Level I QC and Level II QC personnel will be conducted on the revised procedures at that time.

4. Pullman-Higgins will commence a review of isometrics and weld process sheets for determination of closure welds already completed. The initial review will start the week of January 31, 1983 and be limited to ten (10) hot, large bore piping systems. Pullman-Higgins will provide the Construction Manager with a monthly progress update effective the week of March 1, 1983. The scheduled completion date for the engineering review is June 30, 1983 for all previously installed piping systems.

A final report on this subject will be submitted to Region I by July 15, 1983.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY


J. DeVincentis
Project Manager

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cc: Atomic Safety and Licensing Board
cc: Director of Inspection and Enforcement
US Nuclear Regulatory Commission
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