

March 3, 1983

SBN- 484
T.F. B4.2.7

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

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

References: (a) Construction Permit CPPR-135 and CPPR-136, Docket
Nos. 50-443 and 50-444
(b) USNRC Letter, dated February 3, 1983, "Combined Inspection
Nos. 50-443/82-16 and 50-444/82-14," R. W. Starostecki to
W. C. Tallman

Subject: Response to Inspection Nos. 50-443/82-16 and 50-444/82-14

Dear Sir:

In response to the violations reported in the subject inspection, we offer the following:

NRC Notice of Violation (443/82-16-01):

10CFR50, Appendix B, Criterion X and Section 17.1.1.10 of the Seabrook Station FSAR require establishment of an inspection program which verifies the conformance of activities to specific quality criteria. With regard to criteria for the physical independence of electrical systems, the FSAR endorses IEEE Standard 384 by prescribing, in Sections 1.8 and 8.3.1.2.b.5, general conformance to Regulatory Guide 1.75 (Revision 2). IEEE Std 384 requires that the independence of Class 1E systems be maintained subsequent to the design basis failure of non-Category I components. Additional criteria are provided by Fischbach Procedure FECP-504, which prohibits the installation of Class 1E cable in non-safety raceways.

Contrary to the above, as of January 7, 1983, the inspection program for cable installation failed to identify nonconformance to certain criteria in both IEEE 384 and Fischbach Procedure FECP-504, in that a Class 1E cable (A47-F16) was installed in a non-Category I, non-safety raceway. The overall program of inspection of Cable A47-F16, to include design and routing checks and quality control examination, lacked sufficient definition to preclude such a case of improper installation.

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

Response:

Corrective Action Taken and Results Achieved:

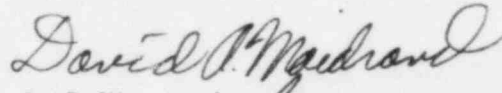
Cable routings are controlled by a UE&C program entitled "CASP." In the case noted, UE&C engineering input into CASP incorrectly requested a red-jacketed (safety-related) cable to be routed to a non-safety area. The FBM (cable installer) inspection program, at the time, did not address possible CASP errors relative to the routing of safety-related cable into non-safety areas.

Subsequent to the NRC inspection, FBM issued an interim procedure change requiring that cable pull slips for safety-related cable with mixed raceway (qualified and non-qualified) be returned to engineering for evaluation and resolution.

Corrective action was implemented on January 13, 1983.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY


J. DeVincentis
Project Manager

ALL/fsf

cc: Atomic Safety and Licensing Board Service List

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