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

CHAIRMAN

March 22, 1991

The Honorable Peter H. Kostmayer
United States House of Representatives
Washington, D.C. 20515

Dear Congressman Kostmayer:

I am responding to your letter of February 6, 1991, concerning the quality of welds at the Seabrook Nuclear Power Station. Our responses to the specific issues you raised are enclosed.

The Nuclear Regulatory Commission (NRC) is fully committed to fulfilling its obligations under the Atomic Energy Act to keep its Congressional oversight committees fully and currently informed of its activities. We believe that we, and the NRC staff, have diligently responded with accurate information to Congressional inquiries and have satisfied the statutory requirement of Section 303 of the Atomic Energy Act with respect to reporting to Congress on the Commission's examination of Seabrook welds. The NRC staff has expended considerable time and effort in responding to the House Committee on Interior and Insular Affairs' requests for documents relating to Seabrook welds. The NRC independent review team on Seabrook welds has concluded its efforts, and the team's report has been provided to the Committee. The Commission is satisfied that the weld quality at the Seabrook Nuclear Station is adequate to ensure protection of the public health and safety.

In view of the licensee's recent discovery that a weld radiograph package that should have been in the QA records vault is missing, the NRC Region I staff is currently requesting information from the licensee concerning radiograph records retention and the missing radiograph weld package (see enclosure at response to request C). We will provide you with all documents associated with this request and the staff's conclusion on this question when they are available. In addition, we remain committed to providing, upon request, our Congressional oversight committees with any documents that we currently possess relating to Seabrook welds. Any other documents requested by Congress that are not currently in our possession will be obtained and supplied where we believe the material could be relevant to the agency's conclusions regarding the adequacy of Seabrook welds.

UNITED STATES
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WASHINGTON, D. C. 20555

CHAIRMAN

March 22, 1991

The Honorable Edward J. Markey
United States House of Representatives
Washington, D.C. 20515

Dear Congressman Markey:

I am responding to your letter of February 6, 1991, concerning the quality of welds at the Seabrook Nuclear Power Station. Our responses to the specific issues you raised are enclosed.

The Nuclear Regulatory Commission (NRC) is fully committed to fulfilling its obligations under the Atomic Energy Act to keep its Congressional oversight committees fully and currently informed of its activities. We believe that we, and the NRC staff, have diligently responded with accurate information to Congressional inquiries and have satisfied the statutory requirement of Section 303 of the Atomic Energy Act with respect to reporting to Congress on the Commission's examination of Seabrook welds. The NRC staff has expended considerable time and effort in responding to the House Committee on Interior and Insular Affairs' requests for documents relating to Seabrook welds. The NRC independent review team on Seabrook welds has concluded its efforts, and the team's report has been provided to the Committee. The Commission is satisfied that the weld quality at the Seabrook Nuclear Station is adequate to ensure protection of the public health and safety.

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WASHINGTON, D. C. 20555

CHAIRMAN

March 22, 1991

The Honorable Nicholas Mavroules
United States House of Representatives
Washington, D.C. 20515

Dear Congressman Mavroules:

I am responding to your letter of February 6, 1991, concerning the quality of welds at the Seabrook Nuclear Power Station. Our responses to the specific issues you raised are enclosed.

The Nuclear Regulatory Commission (NRC) is fully committed to fulfilling its obligations under the Atomic Energy Act to keep its Congressional oversight committees fully and currently informed of its activities. We believe that we, and the NRC staff, have diligently responded with accurate information to Congressional inquiries and have satisfied the statutory requirement of Section 303 of the Atomic Energy Act with respect to reporting to Congress on the Commission's examination of Seabrook welds. The NRC staff has expended considerable time and effort in responding to the House Committee on Interior and Insular Affairs' requests for documents relating to Seabrook welds. The NRC independent review team on Seabrook welds has concluded its efforts, and the team's report has been provided to the Committee. The Commission is satisfied that the weld quality at the Seabrook Nuclear Station is adequate to ensure protection of the public health and safety.

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

CHAIRMAN

March 22, 1991

The Honorable Edward M. Kennedy
United States Senate
Washington, D.C. 20510

Dear Senator Kennedy:

I am responding to your letter of February 6, 1991, concerning the quality of welds at the Seabrook Nuclear Power Station. Our responses to the specific issues you raised are enclosed.

The Nuclear Regulatory Commission (NRC) is fully committed to fulfilling its obligations under the Atomic Energy Act to keep its Congressional oversight committees fully and currently informed of its activities. We believe that we, and the NRC staff, have diligently responded with accurate information to Congressional inquiries and have satisfied the statutory requirement of Section 303 of the Atomic Energy Act with respect to reporting to Congress on the Commission's examination of Seabrook welds. The NRC staff has expended considerable time and effort in responding to the House Committee on Interior and Insular Affairs' requests for documents relating to Seabrook welds. The NRC independent review team on Seabrook welds has concluded its efforts, and the team's report has been provided to the Committee. The Commission is satisfied that the weld quality at the Seabrook Nuclear Station is adequate to ensure protection of the public health and safety.

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

CHAIRMAN

March 22, 1991

The Honorable John F. Kerry
United States Senate
Washington, D.C. 20510

Dear Senator Kerry:

I am responding to your letter of February 6, 1991, concerning the quality of welds at the Seabrook Nuclear Power Station. Our responses to the specific issues you raised are enclosed.

The Nuclear Regulatory Commission (NRC) is fully committed to fulfilling its obligations under the Atomic Energy Act to keep its Congressional oversight committees fully and currently informed of its activities. We believe that we, and the NRC staff, have diligently responded with accurate information to Congressional inquiries and have satisfied the statutory requirement of Section 303 of the Atomic Energy Act with respect to reporting to Congress on the Commission's examination of Seabrook welds. The NRC staff has expended considerable time and effort in responding to the House Committee on Interior and Insular Affairs' requests for documents relating to Seabrook welds. The NRC independent review team on Seabrook welds has concluded its efforts, and the team's report has been provided to the Committee. The Commission is satisfied that the weld quality at the Seabrook Nuclear Station is adequate to ensure protection of the public health and safety.

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With respect to the specific documents requested of the NRC on October 19, 1990, and of the licensee on December 14, 1990, we understand that New Hampshire Yankee has provided these documents to the Chief Counsel for the Subcommittee on Oversight and Investigations of the Committee on Energy and Commerce.

Commissioner Remick did not participate in the preparation of this letter.

Sincerely,

Kenneth M. Carr

Enclosure:
NRC Detailed Response

ENCLOSURE

NRC Response to the February 6, 1991 Letter
From Representatives Kostmayer, Markey, and Mavroules,
and Senators Kennedy and Kerry

Request A

The specific procedure(s), if any, that governed the Yankee Atomic Electric Company's (YAEC's) purported 100% review of radiograph packages, prior to April 1984.

Response

As explained first in the response to the Congressional staff's (Dr. Myers) request of May 29, 1990, and, again in the responses to your letters of August 9 and October 1, 1990, prior to April 1984, no procedural requirement existed which required that the YAEC review of safety-related radiographs be accomplished at a 100% scope. Nevertheless, we were advised by the licensee that such reviews were conducted because of the availability of resources within the YAEC organization and the fact than an acceptable confidence level with the Pullman-Higgins (P-H) reviews had not been established. Such reviews were conducted as surveillances, governed by YAEC Field Surveillance Procedure Number 3. A copy of Revision 7 to this procedure, the revision in effect in April 1984 when the new procedure requiring a YAEC review of all safety-related radiographs was written, along with a copy of related YAEC Field QA Procedure Number 4, was previously provided to the Congressional staff in June 1990. Additional copies of these specific procedures are provided as Attachments 1 and 2.

Request B

The Commission's position as to whether the procedure(s) referred to in Request A above complied with the requirement of 10 CFR 50, Appendix B, Criterion V.

Response

In our December 19, 1990 response to your letter of October 1, 1990, the relationship between the YAEC 100% review of radiographs and the Pullman-Higgins review, the procedures developed to control this review activity, and Seabrook's compliance with the requirements of Criterion V, 10 CFR 50, Appendix B, were explained. Additionally, excerpts from previous correspondence were attached to provide background information and details concerning the above described relationships.

Based on NRC inspections during plant construction, the representations of the YAEC reviewers who conducted the reviews, and the findings of the NRC Independent Review Team, the Commission is of the view that the YAEC review was conducted in accordance with 10 CFR 50, Appendix B. The review was accomplished under the auspices of the licensee's QA Surveillance Program, as

described in the Seabrook FSAR, and, as such, was governed by the licensee's surveillance procedures. Criterion V was met in that the licensee had appropriate procedures in effect for the conduct of a QA Surveillance Program review of the P-H weld radiographs.

Once the review, as performed under the QA Surveillance Program, identified that a continued high level of review was necessary, additional procedures were promulgated to ensure that subsequent review activities were mandated for 100% of the safety-related P-H weld radiographs.

Request C

The Commission's position with regard to whether the Seabrook licensee, in the conduct of the purported 100% review of radiographs, complied with the record keeping requirements of 10 CFR 50, Appendix B, Criteria XVI and XVII.

Response

The document which provides the evidence of the YAEC review of P-H weld film is the final Radiograph Inspection Report (RIR), which is attached to the weld package and stored in the vault. Details are discussed in the response to your August 9, 1990 letter, a copy of which, in part, is attached to this Enclosure as Attachment 3. The following is an excerpt from another portion of that response:

> "The Radiograph Inspection Reports, which are retrievable for each weld requiring radiography, represent not only complete evidence of the film review but also record the acceptable results of these reviews in accordance with 10 CFR 50, Appendix B, Criteria XVII. These RIRs, supported by the actual radiographs, were maintained as QA records and provide sufficient documentary evidence of both radiographic quality of the welds and the completeness of YAEC overview program."

Except as noted below, the licensee's program, as described in the response to Request B and in the attachments to this Enclosure, was in general compliance with the record keeping requirements of 10 CFR 50, Appendix B, Criteria XVII. Individual noncompliances relating to recordkeeping have been identified during NRC inspections; however, except as noted below, subsequent inspections have confirmed that the licensee corrected the problem(s) which led to the noncompliance.

Since the last Commission correspondence with you on this subject, NRC inspection has documented that the original RIR and film of a single radiographic record (Field Weld CS-328-F0204) is missing from the Seabrook vault. The details of this issue are documented in NRC Inspection Report 50-443/90-24, Section 8.2, a copy of which is provided as Attachment 4.

The hard-copy record will be reestablished by re-radiographing this weld during the next plant refueling outage. Plant operation in the interim is acceptable based on the following evidence of weld integrity. A microfilm copy of this RIR, which is part of the QA records available for this weld,

indicates that a final radiograph was shot and interpreted by Pullman-Higgins, with the results documenting weld compliance with ASME III Code, Class 2 criteria. Other QA records provide additional evidence that the weld was radiographed and include field weld process sheet records, which were initialed and dated by the Pullman-Higgins Level III reviewer and by the Authorized Nuclear Inspector. Revision 2 of Nonconformance Report (NCR) 2128 documents a Pullman-Higgins QA engineer's verification on October 7, 1982, that the weld was acceptably repaired and re-radiographed.

Further assurances as to the acceptability of this weld are provided by the results of a volumetric ultrasonic test (UT) inspection performed on January 31, 1986, and a liquid penetrant test (LPT) examination performed on February 12, 1986. These tests were conducted as part of the pre-service inspection program per ASME XI baseline inspection provisions.

Region I is evaluating the lack of a hard-copy record and associated issues to determine whether this case is an isolated problem. In a February 8, 1991 letter from New Hampshire Yankee to the NRC, the licensee indicated that their investigation of the causes of this omission had led them to conclude that this was an isolated occurrence with no discernible generic implications. They go on to indicate that "it appears to be an exception to [their] previously unqualified proposition ... regarding the 100% YAEC review practice." On February 22, 1991, the licensee was requested to provide us their rationale regarding the conclusion that this was an isolated exception from the 100% YAEC review practice. The licensee's response was received on February 27, 1991. Initial review by the staff identified several points requiring additional follow-up; therefore, on March 5, 1991, Region I requested additional clarifying information from the licensee. The licensee responded to this request on March 11, 1991. The response did not provide assurance that the licensee had identified the actual root cause of the missing package. On March 19, 1991, the Region 1 Regional Administrator requested NHY to review their as-built isometric drawings to identify all welds for which radiography was code-required and to compare this with the contents of the QA records vault. Copies of all of these documents are included as Attachments 5-10. Copies of all additional documentation obtained during follow-up will be provided to the Congressional staff.

Finally, on March 20, 1991, during an inspection, the NRC identified an RIR for which the YEAC approval signature was missing. This was for Weld RH-151-01- F0102, a weld in the residual heat removal system. The licensee had an independent film reviewer immediately come to the site to review the film. It was reviewed on March 21 and found to be satisfactory. Continuing inspection into this issue is being conducted by Region 1. The results will be transmited to you as soon as they are determined.

Request D

The Commission's position as to whether the Seabrook licensee, with regard to the purported 100% review of radiographs, complied with the audit requirements of 10 CFR 50, Appendix B, Criterion XVIII.

Response

In the NRC staff response to your letter of August 9, 1990, the separation and distinction between audit requirements and surveillance requirements was explained. The YAEC Quality Assurance Program was described as involving three separate control levels, as follows:

> "Level 1 - Quality control by vendors, constructors, and United Engineers and Constructors (UE&C) on the activities they perform, [and] by YAEC on startup activities. This includes reviews, inspections, and tests."
>
> "Level 2 - Surveillance of design, fabrication, and construction activities, including Level 1 Quality Control. Contractors provide this level for the design and procurement phases. UE&C and YAEC Nuclear Services Division (YNSD) provide additional surveillance on site construction activities."
>
> "Level 3 - Audits by YAEC QA Department of activities performed by Level 1 and Level 2 organizations."

This same NRC staff response also indicated that the "YAEC program for the review of radiographs supplied by Pullman-Higgins (P-H) and other contractors and vendors was a surveillance activity which, as discussed above, was a Level 2 QA program activity affecting quality." While surveillances were performed by the YAEC Field QA Group stationed at the Seabrook site, audits were controlled and in general were performed by YAEC corporate office QA Department personnel as a Level 3 activity. Additionally, as part of the Pullman-Higgins QA program, internal audits of site activities by P-H corporate auditors were performed.

During the construction of Seabrook Station, NRC inspections of the YAEC Level 3 audit program (including the audit reports, their findings, and corrective actions results) were periodically conducted. Furthermore, as documented in NUREG-1425, Appendix 8, a detailed review of several YAEC audit reports and P-H internal audit reports was conducted by the NRC Independent Review Team (IRT). These audit report reviews concentrated on welding and NDE, including radiography; control of special processes and records; and corrective action controls.

NRC inspections of the audit program in place at Seabrook Station during construction revealed no significant items of noncompliance with 10 CFR 50, Appendix B, Criterion XVIII. Specifically with regard to the YAEC

radiographic review program, the interrelationship between the surveillance activities conducted on site and the audit process, controlled by the YAEC corporate QA staff, was evidenced by the fact that the YAEC corporate NDE Level III QA engineer was periodically consulted to resolve differences or problems in radiographic film interpretation.

This same YAEC corporate NDE Level III QA engineer, based upon his qualifications, was also the lead auditor in the conduct of audits at Seabrook Station involving NDE activities. While this individual was precluded from conducting an audit of an area or activity where he himself had been involved in the film interpretation or radiographic problem resolution, the routine liaison conducted by this individual with the YAEC Field QA Group NDE personnel facilitated ongoing evaluation of the effectiveness of the overall radiographic review program by upper (corporate) management.

In summary, it is the Commission's position that the licensee was in general compliance with the requirements of 10 CFR 50, Appendix B, Criterion XVIII with regard to audits of radiographic review activities.

Further, from the NRC staff response (Question 10) to your letter of October 1, 1990, the following excerpt is provided:

> "Review procedures were contained in the audit and surveillance plans and for ASME Code related audits, closely followed the requirements of the Code imposed on the contractor. Typical checklists have been sent to Dr. Myers in response to his May 29, 1990 request for information."
>
> "The recordkeeping requirements for the audits and surveillances were consistent with the standards committed to in the FSAR."

Request E

The Commission's explanation, in light of the contention that the purported 100% review was conducted throughout the duration of pipe welding activities, of why approximately 95% of welds reviewed by the NRC in its NUREG-1425 inspection showed YAEC approvals after Wampler arrived at the site.

Response

The IRT used the inspection plan and the criteria specified in Appendices 2 and 3 of NUREG-1425 for selecting the welds to be reviewed by the team. The welds selected provided a range of differences in such variables as code classes, steel materials, pipe diameters and thicknesses, construction time periods, and film interpreters. Potential problem welds, such as dissimilar metal welds and welds from systems denoted by Mr. Wampler as problem areas during his interview with the team, were also included in the selection criteria. The final sample was chosen by reviewing the Pullman-Higgins Weld Repair Log, Mr. Wampler's logbook, Congressional correspondence, Region I inspection reports, piping isometric drawings, and numerous documents that identified nonconforming conditions. The plan and criteria focused on the

concerns involving pipe welds specified by Congress and the concerns expressed by Mr. Wampler. Thus, the weld sample reviewed by the NRC was biased towards welds which would most likely be deficient, if deficiencies existed.

As shown in NUREG-1425 (Table on page 14-2), during the period 1979-1982, 1173 film packages were reviewed and accepted by YAEC. This represented approximately 28% of the total number of film packages (4177) which they eventually accepted. In 1982, P-H instituted their multi-layer review program to address NRC and YAEC findings. Mr. Wampler was a part of this program while employed by P-H. During the period 1983 - 1986, 3004 film packages were reviewed and accepted by YAEC. This represented the remaining 72% of the total number of film packages accepted. It undoubtedly included film packages that had been reviewed by P-H in the earlier period because of conditions caused by the backlog, design changes, or repairs/reshoots which had been required for various reasons. Thus, a large percentage of the total packages was subjected to both the P-H multi-layer review program and subsequent YAEC review, and this occurred just before, during, and after Mr. Wampler's employment.

The NRC plan focused on a time period surrounding Mr. Wampler's employment. Additionally, a large percentage of the radiographs were reviewed by YAEC after Mr. Wampler arrived on site, which was reflective of the backlog in P-H submittals to YAEC. Therefore, it follows that the NRC team's sample population would include a high proportion of pipe weld radiographs which showed YAEC's approval after Mr. Wampler arrived at the site.

Request F

A Commission statement providing the following information:

F.1 The date when the NRC Region I staff first became aware of the purported 100% radiograph review by YAEC.

General Response to Request F

To the extent that "Request F" requires a "Commission Statement" on the knowledge, intent, or awareness of the NRC staff or the licensee, the Commission can only respond on the basis of information provided to it by the staff or the licensee.

Response to F.1

Item F.1 was previously addressed in the NRC staff response to the June 19, 1990 request from the Congressional staff. A copy of that NRC staff response is provided as Attachment 11.

Additionally, the NRC staff response (Question 3) to your October 1, 1990 letter amplifies the attached response as follows:

> "Furthermore, as has been previously explained in responses to Congressional staff questions, evidence of NRC awareness that YAEC was

reviewing Pullman-Higgins radiographs dates back to mid-1982, as documented in the Region I CAT Inspection Report, 50-443/82-06. The December 1983 date relates to a Congressional question of documented evidence of NRC awareness that the review was a 100% scope activity. Even this documented evidence (i.e., the January 1984 Region I memorandum) indicates that "YAEC NDE personnel had been and still do conduct 100% review of contractor accepted radiographs" (emphasis added).

F.2 An explanation of any delay in the NRC becoming aware of the purported 100% review and its role in assuring weld quality at Seabrook.

Response to F.2

The discussion in F.1 above, along with the attached response (Attachment 11), shows why no "delay" in the NRC staff's awareness of the YAEC radiographic review process is evident. As documented in Inspection Report 50-443/82-06, the NRC was aware in mid-1982 that YAEC was reviewing Pullman-Higgins radiographs. Nothing would have been perceived as unusual about this practice because, as stated in several other NRC staff responses, YAEC QA review of radiographs would have been expected to have been performed as a routine surveillance. It was considered to be a sampling activity (like most surveillances) of all the film turned over until such time that adequate confidence could be gained to allow the sample size to be reduced. That confidence was never realized and, in fact, the radiography violation identified by the NRC in Inspection Report 50-443/82-06 actually caused the licensee to create another level of radiographic film review (i.e., the Pullman-Higgins Level III review) as part of the corrective action program.

In the latter part of 1983, when major deficiencies were identified and documented by YAEC film reviewers in the Pullman-Higgins radiographic review and turnover program, the issue of the continued need for YAEC review of radiographs at a 100% scope became highly visible. This is why, in the December 1983 timeframe, NRC Region I staff awareness of the 100% nature of the film review was highlighted. In fact, the words quoted above from the internal Region I memorandum of January 4, 1984, showed awareness of a process that "had been" conducted for some period of time and not one recently initiated.

Thus, while documented evidence of NRC awareness of "100%" review of radiographs dates back only to the December 1983 timeframe, NRC awareness of the fact that YAEC was conducting film reviews as part of the QA program to assure weld quality dates back at least to mid-1982.

F.3 The date of the first NRC inspection and/or SALP report which described the role of the purported 100% review in assuring weld quality.

Response

As discussed in the response to Requests F.1 and F.2 above, NRC Region I Inspection Report 50-443/82-06 documents NRC awareness of the YAEC review of

radiographs; however, that the review was being conducted at a "100%" scope was not specifically documented.

Also, as discussed in the response to the Congressional staff request of June 19, 1990, a copy of which, in part, has been provided in response to Requests F.1 and F.2 (Attachment 11), the SALP report issued on May 17, 1984, describes the YAEC "customer review" of ASME final code acceptable radiographic film. Again, while this YAEC review is not documented at "100%" scope, the NRC Region I author of this SALP section was aware that the review was being conducted at a "100%" level because he was also the author of the internal Region I memorandum of January 4, 1984, acknowledging the 100% review effort.

Therefore, as explained in the Introductory Section of the enclosure to the response to your October 1, 1990 letter, the term "review" as it relates to the YAEC review of final Pullman-Higgins weld radiographs must be separated and evaluated distinctly from the scope of that "review" program (i.e., 100%). In other words, regulatory requirements mandated, and NRC inspections checked for, an effective program and did not specify what percentage of YAEC film review was required to render the radiograph and weld quality program an effective one.

F.4 An explanation of delay in the licensee's awareness of a large backlog of radiographs that had not been transmitted from the welding contractor to the licensee and how this lack of knowledge can be explained in light of the NRC's repeated claims that the licensee maintained a 100% review of all radiographs beginning with the initiation of the pipe welding program.

Response

The backlog of radiographic film, including how the backlog developed and was dispositioned, is discussed in detail in Section 4 of NUREG-1425. Furthermore, in the response to your letter of October 1, 1990, the following is noted:

> "The fact that there was a backlog of radiographs to be reviewed does not relate in any way to the performance of a 100% review of YAEC. It simply meant that the radiographs had not yet been turned over to YAEC for review."

Although the backlog did impact normal pipe welding and NDE activities, it did not constitute a safety concern because the pipe welds and radiographic film rejects were ultimately properly dispositioned during the construction period. Nonetheless, as indicated in the response to Request C and as documented in the staff's August 6, 1990 letter to the licensee, the Pullman-Higgins failure to take timely corrective action was a violation of 10 CFR 50, Appendix B, Criterion XVI.

YAEC QA personnel knew that their program entailed a review of final film from Pullman-Higgins prior to records storage. The existence of a backlog would not affect this awareness or the conduct of the YAEC review program in

any way. This is because the 100% review would still be conducted when the turnover of film from Pullman-Higgins occurred, regardless of whether that film was backlogged.

Request G

The Commission's explanation of why the NRC staff, in the conduct of the inspection leading to NUREG-1425, failed to obtain information specified in Items 4e, 4f, and 4g of the PLAN FOR TEAM INSPECTION AT SEABROOK, reproduced in NUREG-1425, Appendix 2.

Response

As provided in the plan (NUREG-1425, Appendix 2), the team leader had full authority to modify the team composition and the plan based on the results of discussions with Mr. Wampler and the team's inspection findings. Based on implementation of the plan, the team leader made adjustments to it based on information obtained during the team's review process. NUREG-1425, Section 1, discusses some of the additions and changes to the plan that, to a degree, broadened the scope and depth of the evaluation and also shows that additional staff support with expertise in metallurgy was added to the team.

When developing the inspection plan, the team leader had only limited information available with respect to the issue involving Level III re-review of radiographs. Item 4 (with sub-items (a) through (k)) was included within the plan and was accomplished in an integrated manner with the other elements of the plan, particularly Items 2, 3, 5, 6, 9, 10, 12, and 13, in order to ascertain and understand the radiographic film review process from a historical (after-the-fact) perspective and to aid in making a safety judgment regarding the adequacy of the review process that had been used at Seabrook.

With respect to the information relating to Items 4e, 4f, and 4g (and other related elements of the plan), the team obtained sufficient information to make its safety judgment regarding the adequacy of the film review process used at Seabrook. The information obtained, including the team's findings and conclusions, was discussed in Sections 8, 9, and 14 and related Appendices 5 and 6. Additional supporting information was also provided in Sections 2, 3, 4, 12, 13, 15, and 17 of NUREG-1425. To have obtained more information about these items once a safety judgment was made, while perhaps interesting from a statistical standpoint, was not considered necessary by the team to achieve the objective of the plan and would have been viewed as an inappropriate and inefficient use of the available resources.

In the Commission's view, it was wholly appropriate for the Team Leader and the Independent Review Team to have the flexibility to modify the team composition and adjust the review plan as the findings made during the course of the review and inspections warranted. The Commission believes that the team conducted its review in a professional and thorough manner, consistent with the charter provided by NRC senior management (NUREG-1425, Appendix 1), and that the purpose (objective) of the team's plan was fully achieved.