

August 28, 1984
SBN- 706
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 Permits CPPR-135 and CPPR-136, Docket
Nos. 50-443 and 50-444
(b) USNRC Letter, dated July 24, 1984, "Combined Inspection
Nos. 50-443/84-08; 50-444/84-03", R. W. Starostecki to
R. J. Harrison

Subject: Response to Combined Inspection Nos. 50-443/84-08; 50-444/84-03

Dear Sir:

In response to the violation which you reported in the subject inspection we offer the following:

NRC Notice of Violation (444/84-03-01)

As a result of the inspection conducted on May 29 - June 25, 1984, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C) published in the Federal Register on March 8, 1984 (49 FR 8583), the following violation was identified:

10 CFR 50, Appendix B, Criterion XIII and the Seabrook Station FSAR, Section 17.1.1.13, require that measures be established to control storage cleaning and preservation of equipment to prevent damage and deterioration. For particular products, special protective environments, such as inert gas atmosphere, specific moisture content levels, and temperature levels, shall be provided. The Westinghouse Nuclear Service Division (WNSD) manual provides guidelines for the storage of NSSS components in accordance with ANSI N45.2.2 1972.

Contrary to the above, adequate storage and preservation of equipment located inside of Unit 2 containment is not being provided for the following NSSS components.

1. The secondary side of steam generator 2A and the pressurizer have not been provided with an air-circulating system to control humidity, temperature, and dew point.

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2. Steam generators 2B, 2C, and 2D are provided with air-circulation systems. However, humidity, temperature, and dew point measurements are not being performed to assure their preservation for future use.
3. Reactor vessel flange stud hole No. 16 was not covered and contained dirt and grit, and did not appear to be fully coated with Tectyl-506; removal of No. 17 hole cap revealed that it contained approximately 1 1/4 inches of water. The Tectyl appeared to be worn off of the face of the flange in the areas adjacent to these stud holes.

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

Response

Corrective Action Taken and Results Achieved

The Unit 2 reactor vessel, pressurizer, and steam generators were rough set in-place just prior to the temporary halt in construction activities. Inadvertently, the secondary side of steam generator 2A and the pressurizer were not provided with air-circulating systems and a method for determining humidity exposure had not been included with the installed air-circulation systems.

During the construction suspension period, not all preventative maintenance requirements were able to be accomplished.

As a result of the NRC inspection, the identified concerns were documented in UE&C Nonconformance Reports.

The stud holes on Unit 2 reactor vessel have been inspected and cleaned, as required. Accessible stud holes on the Unit 1 reactor vessel have been inspected, the remainder to be checked when the construction platform is removed. No nonconforming conditions were noted on either vessel.

As required by Westinghouse instructions, air-circulation systems for the steam generators are in place with indicators placed in the air return line to monitor humidity. An inspection of the secondary side of steam generator 2A determined that no adverse effects had been caused by the temporary lack of air-circulation.

Expandable plugs have been ordered and will be installed in the pressurizer and one steam generator during September 1984. This will permit a purge to be placed on the pressurizer and on the secondary side of the steam generator. If this proves successful, the three remaining steam generators will be handled similarly.

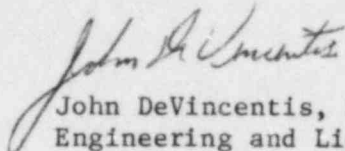
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It is expected that these actions will be completed by October 31, 1984.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY



John DeVincentis, Director
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JDV/ba

cc: Atomic Safety and Licensing Board Service List

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