



Public Service of New Hampshire

NEW HAMPSHIRE YANKEE DIVISION

SEABROOK STATION
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November 15, 1984
SBN- 732
T.F. B4.2.7

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

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

References: (a) Construction Permits CPPR-135 and CPPR-136, Docket Nos. 50-443 and 50-444
(b) USNRC Letter, dated October 10, 1984, "Combined Inspection Nos. 50-443/84-12 and 50-444/84-06", T. T. Martin to W. B. Derrickson

Subject: Response to Combined Inspection Nos. 50-443/84-12 and 50-444/84-06

Dear Sir:

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

NRC Notice of Violation: (50-443/84-12-03)

10CFR50, Appendix B, Criterion 16, Corrective Action, states in part, "Measures shall be established to assure that conditions adverse to quality, such as ...nonconformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition."

The Seabrook FSAR, Chapter 17, Section 17.1.1.16, Corrective Action states, "The corrective action program requires that conditions adverse to quality be promptly identified, the cause be determined, corrective action to be taken to preclude repetition, and..."

Pullman Higgins NCR 7433 identified an unauthorized (forged) signature at an inspection hold point and dispositioned the NCR "Use As Is" after an inspection of the weld in question established the quality of the weld met requirements. This inspection satisfied the remedial aspect of corrective action.

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Contrary to the Quality Assurance requirements, the licensee's contractors did not prescribe corrective action to preclude repetition.

This is a Severity Level IV violation (Supplement II) applicable to CFP-135.

RESPONSE

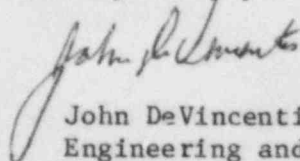
Corrective Action Taken and Results Achieved

The licensee concurs with the violation as stated. The lack of adequate corrective action is evidence of the exercise of poor judgement by the contractor in question. As a result of licensee involvement, the following actions have occurred:

1. P-H issued a memorandum to all its employees, dated August 30, 1984, discussing the falsification of documents and the punitive action which could result.
2. P-H reviewed a sample of completed weld process sheets to determine if there were additional cases of unauthorized signatures. One additional similar discrepancy was noted on the same process sheet which was the subject of the original NCR. This sign-off was evidently made by the same unknown individual.
3. YAEC CQA made an independent review of P-H weld process sheets to determine if the reported case was isolated. No additional cases were noted.
4. As a remedial action, the weld was radiographed and found satisfactory.
5. There is an ongoing program for the training of site personnel regarding the seriousness of the falsification of documents or the providing of misleading information.
6. Management's endorsement of the above listed corrective actions is an effort to preclude recurrence.

Corrective action, other than the ongoing training, was completed on September 6, 1984.

Very truly yours,



John DeVincentis, Director
Engineering and Licensing

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