



Public Service of New Hampshire

December 28, 1984

SBN- 744

T.F. B4.2.7

New Hampshire Yankee Division

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

Reference: (a) Construction Permits CPPR-135 and CPPR-136,  
Docket Nos. 50-443 and 50-444  
(b) USNRC Letter, dated November 27, 1984, "Combined Inspection  
Nos. 50-443/84-13; 50-444/84-05", H. B. Kister to  
R. J. Harrison

Subject: Response to Combined Inspection Nos. 50-443/84-13 and  
50-444/84-05

Dear Sir:

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

NRC Notice of Violation (443/84-13-04):

10CFR50, Appendix B, Criterion XVII and the Seabrook Station FSAR, Section 17.1.1.17, require that records be maintained to furnish evidence of activities affecting quality, to include the results of work performance and material analyses. In accordance with Appendix B Criterion IX, the work performance of special processes shall be accomplished to meet applicable criteria. UE&C Engineering Change Authorization (ECA) 01/2374 specified certain of those criteria required for adequate bolt installation in the steam generator lower lateral support members. In accordance with Appendix B Criterion VIII, item material identification (e.g., heat numbers) shall be maintained on records traceable to the item. UE&C disposition to a contractor nonconformance report, documenting the lack of heat number traceability for certain steam generator lateral support member parts, required revision to the supplier's quality release records.

Contrary to the above, as of October 26, 1984, the records documenting work performance and material traceability for the steam generator lateral support members were inadequate, in that:

- (1) Documented evidence was not available to substantiate complete compliance with the criteria of ECA 01/2374.

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- (2) Supplier quality release records had not been revised to document complete item heat number traceability to the material test results.

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

Response:

Corrective Action Taken and Results Achieved

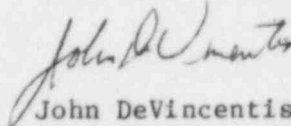
- (1) Operation No. 4 on the Pullman-Higgins process sheets for installing the lower lateral supports calls for torquing to a snug tight condition, approximately 200 ft/lbs (up to 2,000 ft/lbs) in 100 ft/lbs increments, referencing Field Instruction FI-120 as the applicable procedure. This field instruction delineates, step by step the method for obtaining reasonable contact at the splice joints, in accordance with ECA 01/2374C. Although there was no QC Hold Point on this step, sufficient evidence does exist to document the fact that field instruction FI-120 was followed. This evidence exists in the form of the Pullman-Higgins field engineer's records, mapping the gap dimensions required in step 2 on sheet 2 of ECA 01/2374C and the QC inspector's personal records documenting that the nuts were checked to see if they ran free on the bolt threads. It should be noted that spare nuts were available and at those places where the QC inspector's records show that there were problems with the nuts running free, spare nuts were used.

In addition, the physical existence of the shims and the QC inspector's marking on the bolts which indicates completion of torquing also indicates compliance with FI-120. In order to complete the document package for the installation of these supports, Pullman-Higgins will be directed to include a copy of the engineer's and QC inspector's records in with the process sheets and field instruction in the document package.

- (2) This discrepancy has been addressed in a Pullman-Higgins NCR since they had prematurely closed the NCR which, as part of its' resolution, required the obtaining of corrected Quality Releases from Westinghouse. Subsequently, Westinghouse was requested to provide the corrected documentation and they are now in the process of revising the Quality Releases for formal transmittal to the site.

Corrective action will be completed by February 28, 1985.

Very truly yours,



John DeVincentis, Director  
Engineering and Licensing

cc: Atomic Safety and Licensing Board Service List

Director, Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

\* William S. Jordan, III  
Diane Curran  
Harmon, Weiss & Jordan  
20001 S Street N.W.  
Suite 430  
Washington, D.C. 20009

Robert G. Perlis  
Office of the Executive Legal Director  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Robert A. Backus, Esquire  
116 Lowell Street  
P.O. Box 516  
Manchester, NH 03105

Philip Ahrens, Esquire  
Assistant Attorney General  
Department of the Attorney General  
Augusta, ME 04333

Mr. John B. Tanzer  
Designated Representative of  
the Town of Hampton  
5 Morningside Drive  
Hampton, NH 03842

Roberta C. Pevear  
Designated Representative of  
the Town of Hampton Falls  
Drinkwater Road  
Hampton Falls, NH 03844

Mrs. Sandra Gavutis  
Designated Representative of  
the Town of Kensington  
RFD 1  
East Kingston, NH 03827

Jo Ann Shotwell, Esquire  
Assistant Attorney General  
Environmental Protection Bureau  
Department of the Attorney General  
One Ashburton Place, 19th Floor  
Boston, MA 02108

Senator Gordon J. Humphrey  
U.S. Senate  
Washington, DC 20510  
(Attn: Tom Burack)

Diana P. Randall  
70 Collins Street  
SEabrook, NH 03874

Donald E. Chick  
Town Manager  
Town of Exeter  
10 Front Street  
Exeter, NH 03833

Brentwood Board of Selectmen  
RED Dalton Road  
Brentwood, New Hampshire 03833

Edward F. Meany  
Designated Representative of  
the Town of Rye  
155 Washington Road  
Rye, NH 03870

Calvin A. Canney  
City Manager  
City Hall  
126 Daniel Street  
Portsmouth, NH 03801

Dana Bisbee, Esquire  
Assistant Attorney General  
Office of the Attorney General  
208 State House Annex  
Concord, NH 03301

Anne Verge, Chairperson  
Board of Selectmen  
Town Hall  
South Hampton, NH 03842

Patrick J. McKeon  
Selectmen's Office  
10 Central Road  
Rye, NH 03870

Carole F. Kagan, Esq.  
Atomic Safety and Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Mr. Angie Machiros  
Chairman of the Board of Selectmen  
Town of Newbury  
Newbury, MA 01950

Town Manager's Office  
Town Hall - Friend Street  
Amesbury, Ma. 01913

Senator Gordon J. Humphrey  
1 Pillsbury Street  
Concord, NH 03301  
(Attn: Herb Boynton)

Richard E. Sullivan, Mayor  
City Hall  
Newburyport, MA 01950