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January 31, 1985

Docket No. 50-423 F0666A

Dr. Thomas E. Murley Regional Administrator Region I U.S. Nuclear Regulatory Commission 631 Park Avenue King of Prussia, PA 19406

- Reference(s): 1. T. T. Martin letter to W. G. Counsil, IE Inspection Report No. 50-423/83-14, dated November 22, 1983.
 - 2. W. G. Counsil letter to T. T. Martin, A03651, dated December 22, 1983.
 - 3. W. G. Couns: letter to T. T. Martin, F0454A, dated March 16, 1984.
 - W. G. Coursil letter to T. E. Murley, F0557A, dated June 18, 1984.
 - 5. W. G. Counsil letter to T. E. Murley, F0575A, dated September 28, 1984.
 - 6. E. C. Wenzinger letter to W. G. Counsil, IE Inspection Report No. 50-423/84-20, dated December 21, 1984.
 - 7. W. G. Counsil letter to R. W. Starostecki, A04566, dated January 18, 1985.

Dear Dr. Murley:

Millstone Nuclear Power Station, Unit No. 3
Reporting of Potential Significant Deficiencies
in Design and Construction:
Tubeco Weld Radiographs (SD-56)

Potential deficiencies with Tubeco weld radiographs were first identified in a notice of violation in IE Inspection Report 50-423/83-14 (Reference 1). The violation concerned potential film density violations and the placing of penetrameters in the weld. NNECO responded to this notice of violation and concluded that these were not technical problems or safety concerns (References 2 and 3). However, a subsequent review uncovered three additional potential

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-2problems with Tubeco weld radiographs (undocumented linear indications, excessive geometric unsharpness, and penetrameter identification numbers in the weld) which lead us to report a potential significant deficiency in the construction of Millstone Unit No. 3, as required by 10 CFR 50.55(e) (Reference 4). We concluded that this was not a significant deficiency and that we believed Tubeco weld quality was adequate (Reference 5). In Reference 6, you requested that we revise our September 28, 1984 (Reference 5) response to you based on information revealed during a subsequent, independent review of Tubeco weld radiographs by one of your inspectors. In accordance with a commitment made in Reference 7, NNECO hereby provides an update regarding our plans, as well as actions already taken to address the deficiencies associated with Tubeco weld radiographs. These actions and plans are summarized below: NNECO has completed a 100% review of Tubeco radiographs for QA Category I, ASME III, Code Class 1, 2, and 3 welds. Actions currently being taken include re-radiographing or providing an acceptable alternate code nondestructive examination for radiographs rejected for technique, and repairing any code rejectable indications. Corrective action is presently being taken where required to meet commitments to the ASME III Code. 0 Upon completion of all re-evaluations and repairs, a review of all unacceptable welds will be performed. This review shall determine if any safety concerns would have resulted if the rejectable indications had gone undetected. 0 A detailed report will be prepared to document the evaluation and review of the Tubeco radiograph problems.

We will keep you informed of our progress regarding the resolution of this item. Our next update will be provided to you by June 28, 1985.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

W. G. Counsil

Senior Vice President

cc: Mr. J. M. Taylor, Director
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