



Public Service of New Hampshire

February 7, 1985

New Hampshire Yankee Division

SBN- 760  
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 January 7, 1985, "Combined Inspection  
Nos. 50-443/84-17 and 50-444/84-07", S. J. Collins to  
R. J. Harrison

Subject: Response to Combined Inspection Nos. 50-443/84-17 and  
50-444/84-07

Dear Sir:

It was reported in the subject Inspection Report that one of our activities was not conducted in accordance with commitments in the FSAR. In response to the reported FSAR deviation, we offer the following:

FSAR Deviation

The Seabrook FSAR, in Section 1.8, specifies conformance to the provisions of USNRC Regulatory Guide 1.84 for use in Balance of Plant design applications. Regulatory Position C.3 of Regulatory Guide 1.84 states that ASME Code Case editions that have been superseded by revised code cases are no longer endorsed by USNRC regulatory guidance, as of the date of approval of the revised version of the code case. Furthermore, UE&C Specifications (e.g., 248-43) list those code cases approved for use at Seabrook.

Contrary to the above, a design change (ECA 19/100008A) directed the use of a code case edition (N237-1), which had been superseded more than one year prior to the design change approval date. Also, Specification 248-43 was not revised to list the newer edition of the code case being adopted by the design change. This resulted in not only a deviation from Regulatory Guide 1.84 and conflicting design criteria in the specification and ECA, but also the unauthorized waiver of a nondestructive examination of certain welds affected by Code Case N237.

This deviation is applicable to Docket Nos. 50-443 & 50-444.

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Corrective Action

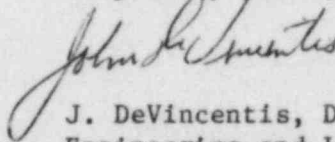
The revision of this code case (N237-0) which was approved for use at Seabrook, as indicated in the FSAR (Table 1.8-2), has been included in Revision B of the design change (ECA 19/100008A) issued December 1, 1984.

To assure control of ASME Code Cases in the design change process, the following actions will be taken:

- o Administrative Procedure No. 15, "Project Design Changes", has been revised to require Yankee Atomic Nuclear Services Division review and approval of ASME Code Cases adopted for use.
- o All effected Engineering personnel will be instructed to conform to Regulatory Guides 1.84 and 1.85 and FSAR commitments.
- o In addition, we are currently reviewing the previous practice regarding the use of code cases on both the BOP and NSSS Systems to ensure compliance with regulatory requirements and FSAR commitments.

We expect these activities to be completed by June 28, 1985.

Very truly yours,



J. DeVincentis, Director  
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