PSNH

Public Service of New Hampshire

SEABROOK STATION
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October 23, 1984

SBN- 724
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 August 29, 1984, "Construction Appraisal Team Inspection 50-443/84-07", R.W. Starostecki to R.J. Harrison
(c) PSNH Letter, dated September 28, 1984, "Response to Construction Appraisal Team Inspection 50-443/84-07", J. DeVincentis to R.W. Starostecki

Subject: Response to Construction Appraisal Team Inspection Executive Summary

Dear Sir:

In Reference (c), we stated that we planned to forward, in the near future, a response to the Executive Summary of your Construction Appraisal Team Inspection.

Attached is our response wherein we conclude all potential program weaknesses have been addressed.

Very truly yours,

John DeVincentis, Director
Engineering and Licensing

JDV/JM/adl
Attachment

cc: Atomic Safety and Licensing Board Service List

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1. Hardware is being installed and inspected while design changes continue. This iterative design has significantly affected the installation and inspection work thus far completed. It appears that the full impact of changes and revisions have not been properly assessed by the engineering organization for their potential impact on procured and installed hardware. While these changes may not be significant from the design standpoint, they may have significant impact on procured and installed hardware.

Response

Project management established a formal Change Control Program in April, 1984. The Program is implemented by a Change Control Team comprised of representatives of Construction, Operations, Start-up, and Engineering. The purpose of the program is to restrict design changes to those required to assure systems, structures and equipment are installed properly and will function safely and reliably during operation.

The program identifies sources of changes and mandates the expeditious completion of required changes. A key aspect of the Change Control Program is an evaluation of the impact of proposed design changes on procured and installed hardware. The Change Control Program in place at Seabrook assures proper coordination of engineering and construction activities on all design changes.

2. A communication problem between the applicant's various management, engineering and construction groups (utility, engineering, contractors, and QA/QC personnel) was identified. Throughout the inspection period, numerous discussions and meetings were held to provide the NRC Construction Appraisal Team (CAT) an understanding of the installation of seismic cable tray supports and the procurement classification, seismic design philosophy, and seismic qualification of the cable tray system. No consistent methods for control of design, procurement and installation were presented to NRC CAT inspectors by the applicant's representatives.

Response

Comprehensive improvements in the project organization have been underway since March, 1984. The project organization has been integrated within a clearly defined structure which establishes singular responsibility for each project function. Responsibilities for all project functions are now located on site. The consolidation of the complete project team in one location, for the first time, has been a major enhancement of communication between groups.

Project procedures utilized to conduct day to day activities have been evaluated by project management and streamlined significantly. Furthermore, the number of contracting organizations on the project has been substantially reduced. The reduction of interfacing organizations has enabled us to further simplify and streamline project procedures.

The specific problems associated with the installation of seismic cable tray supports were addressed in our letter to Mr. R.W. Starostecki, SBN-718 dated September 28, 1984, which addresses the violations of Construction Appraisal Team Inspection 50-443/84-07. Methods for control of design, procurement and installation of cable tray supports are consistent with requirements.

Previously identified concerns regarding interfacing and communication between project groups have been resolved. Lines of authority and responsibility have been clarified and continued improvement is evident.

3. Weaknesses involving piping support installations have been previously identified by NRC Region I. Many of these weaknesses have existed for some time. The NRC CAT inspectors noted similar programmatic weaknesses with regard to installation activities in the mechanical construction area.

Response

The responsibility for piping and pipe support installations which were previously fragmented between participating organizations have been assigned to one organization. Construction management authority and direction has been assumed by the owner, thus providing one source of direction and sole accountability. The Quality Assurance and Quality Control responsibilities on the project have also been integrated under the same concept of singular responsibility. These changes, along with communication enhancements discussed in Item 2, alleviate the potential for the programmatic weaknesses and concerns previously identified.

In summary, the project reorganization and management action taken will minimize the potential weakness identified in the area of piping and pipe supports. We are committed to continued management emphasis in this area in order to eliminate further reoccurrences of identified concerns.

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