



Wendell P. Johnson
Vice President

Public Service of New Hampshire
NEW HAMPSHIRE YANKEE DIVISION

October 31, 1984

SBN-722
T.F. B7.1.2

United States Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Mr. George W. Knighton, Chief
Licensing Branch No. 3
Division of Licensing

References: (a) Construction Permits CPPR-135 and CPPR-136, Docket
Nos. 50-443 and 50-444
(b) PSNH Letter, dated August 31, 1984, "New Hampshire Yankee
Division Present Role in Seabrook Construction",
W. P. Johnson to G. W. Knighton
(c) PSNH Letter, dated September 25, 1984, "Amendment 53 to
March 30, 1973, Application to Construct and Operate
Seabrook Station Unit 1 and Unit 2", W. P. Johnson to
G. W. Knighton
(d) USNRC Letter, dated October 16, 1984, "Organizational
Changes to Public Service Company of New Hampshire in the
Seabrook FSAR", G. W. Knighton to R. J. Harrison

Subject: Response to Information Requests Regarding New Hampshire Yankee
Division Implementation

Dear Sir:

In Reference (b), we submitted annotated Operating License Application (FSAR) pages which reflected the implementation of the New Hampshire Yankee Division of Public Service Company of New Hampshire. Subsequently, the Operating License Application was formally amended (Amendment 53) to incorporate the material previously submitted in Reference (b).

In Reference (d), you requested information to support your preliminary finding that "the changes are generally acceptable and that the QA program continues to be in accordance with 10CFR50 Appendix B".

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Attached to this letter are our responses to your information requests which were included in Reference (d). Some of our responses are in the form of annotated FSAR pages which are also attached. The annotated FSAR pages will be incorporated in the next OL Application Amendment.

Very truly yours,

W.P. Johnson
W. P. Johnson
Vice President

Attachments

cc: Atomic Safety and Licensing Board Service List

COMMONWEALTH OF MASSACHUSETTS)
)ss
MIDDLESEX COUNTY)

Then personally appeared before me, W. P. Johnson, who, being duly sworn, did state that he is a Vice President of Public Service of New Hampshire, that he is duly authorized to execute and file the foregoing request in the name and on the behalf of Public Service of New Hampshire and that the statements therein are true to the best of his knowledge and belief.

A.L. Legendre Jr.
A. L. Legendre, Jr. Notary Public
My Commission Expires August 5, 1988



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ATTACHMENT

Responses to Questions/Comments Regarding
New Hampshire Yankee Division Implementation

1. Describe in more detail the interface responsibility between the Quality Assurance organization of Yankee Atomic Electric Company (YAEC) Construction Department and the organizational units within the following: 1) New Hampshire Yankee Division (NHVD), 2) United Engineers and Constructors (UE&C), and 3) Westinghouse Electric Corporation (WRD).

Response

FSAR Figure 17.1-1 (attached) has been annotated to fully identify the integrated Quality Assurance organization which is under the authority of the YAEC Director of QA and the YAEC QA Manager. A new Figure 17.1-1A (attached) has been developed to provide a composite illustration of the Quality Assurance interfaces existing on the Project. Also, FSAR Pages 17.1-6 (attached) and 17.1-8 (attached) have been annotated to provide a discussion of the Quality Assurance interface.

2. Identify organizational positions within NHVD and YAEC with stop work authority and describe the extent this authority is documented and transferred to personnel of PSNH, YAEC, UE&C, and WRD.

Response

The authority to order that work be stopped on any operation found being performed contrary to approved procedures, specifications, instructions, or drawings rests with the YAEC Quality Assurance Manager (QAM) and personnel reporting to him. This is specifically documented in Section 17.1.1.1 of the FSAR. This authority is transferred to personnel of PSNH, YAEC, UE&C, and Westinghouse since Quality Assurance personnel of each organization report to the YAEC QAM. The stop work authority of project participants is further described in their corporate Quality Assurance manuals.

3. Since Mr. E. A. Brown and G. F. McDonald are on YAEC payroll, describe any authority and responsibilities they have outside the Seabrook Project and identify appropriate percentage of time devoted to outside activities.

Response

Mr. E. A. Brown and Mr. G. F. McDonald are assigned exclusively to the Seabrook Project as are numerous Yankee Atomic Electric Company employees who are involved in Engineering, Quality Assurance, and Startup.

4. Describe those provisions for resolving disputes regarding quality arising from a difference of opinion between QA/QC personnel and other department personnel within PSNH, YAEC, UE&C, and WRD.

Response

FSAR Page 17.1-1 (attached) has been annotated to include the following wording regarding the resolution of quality disputes:

Quality disputes between PSNH, YAEC, UE&C, and Westinghouse which cannot be resolved at the working level are brought progressively to the attention of increasingly higher levels of line management of each organization with ultimate resolution, if required, by the PSNH Chairman and Chief Executive Officer.

YNSD is supplying Seabrook Station with supporting nuclear expertise in the following specific areas:

Mechanical Engineering
Electrical Engineering
Instrument and Control Engineering
Systems Engineering
Welding
In-Service Inspection
Nuclear Engineering
Accident Analyses
Transient Analyses
Reload Analyses
Health Physics
Dose Assessment
NRC Licensing
Meteorology
Fuel Fabrication
Fuel Procurement
Fire Protection
Vendor QA Auditing
Engineering and Operational QA
Emergency Planning
Environmental Engineering

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The Seabrook Station and Nuclear Support Services Staffs supply the additional necessary expertise to support and operate the station. A combination of administrative controls, the setting of specific responsibilities for each organization, and open communications paths between organizations are used to assure a safe and efficient working relationship between the support organizations.

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13.1.1.5 Construction and Construction/Operation Interface

a. Construction Phase

The New Hampshire Yankee (NHY) division of Public Service Company of New Hampshire is responsible for the construction of Seabrook Station. The overall responsibility for all activities associated with Seabrook Station resides in descending order with the PSMH President and Chief Executive Officer, the NHY President and Chief Executive Officer, and the NHY Senior Vice President, who is designated as management official in overall charge of the construction of the station. The NHY entity is dedicated to the completion of this construction project.

An integrated project organization has been established, working under the direction of the NHY Senior Vice President, to ensure effective project management control. This integrated organization is comprised of the Director of Construction and his staff, the Director of Engineering and Licensing and his staff; the Vice President of Nuclear Production and his staff; and the Vice President in charge of Administrative Services, is responsible for interfacing with YAEC Quality Assurance Department.

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CHAPTER 17

QUALITY ASSURANCE

17.1 QUALITY ASSURANCE DURING DESIGN AND CONSTRUCTION

17.1.1 Yankee Atomic Electric Company

17.1.1.1 Organization

a. Authority, Responsibilities, and Duties

The Public Service Company of New Hampshire (PSNH) retains overall responsibility for Quality Assurance, and has delegated to the Yankee Atomic Electric Company (YAEC) the responsibility for the development, execution, and administration of the quality assurance program which involves quality-related activities during the design, procurement, construction, and preoperational testing phases for safety-related structures, components and systems.

Yankee Atomic Electric Company has established the organizational structure shown in Figure 13.1-2 for the design, procurement and construction phases of the Seabrook (SB) Project. This figure shows the lines of authority and communication as it relates to the Seabrook organization. Figure 17.1-1 depicts the overall intercompany project quality assurance organization ~~showing~~ showing the major organizations involved and how they interrelate. For additional details, reference Section 13.1 of this FSAR.

And Figure 17.1-1A

And Project

YAEC has delegated to the Engineer-Constructor, United Engineers & Constructors Inc. (UE&C), and to the nuclear steam system supplier, Westinghouse Electric Corporation-Water Reactor Divisions (WRD), administration and execution of large portions of the quality assurance program associated with the design, procurement and installation of safety-related structures and equipment, as defined in Tables 17.1-1, 17.1-2 and 17.1-3. UE&C and WRD and their vendors and subcontractors who are responsible for safety-related components and structures, are required to have quality assurance programs consistent with the requirements of 10CFR50, Appendix B, and of this Program.

and other key Project

The responsibilities of YAEC management are outlined below:

personnel

Quality disputes between PSNH, YAEC, UE&C, and Westinghouse which cannot be resolved at the working level are brought progressively to the attention of increasingly higher levels of line management of each organization with ultimate resolution, if required, by the PSNH Chairman and Chief Executive Officer.

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qualifications and performance of personnel are evaluated annually. The training program is described in the Seabrook Station Assurance Manual. The Quality Assurance Department is staffed with personnel knowledgeable and qualified in the following:

1. SNT-TC-1A Levels II and III
2. Quality Assurance for mechanical equipment
3. Quality Assurance for electrical equipment
4. Quality Assurance for instrumentation and control equipment
5. Quality Assurance for construction activities.

Personnel qualifications to review design and procurement documents and QA Programs and to perform audits are reviewed annually at which time a determination is made for the need for further training. Responsibilities and duties are assigned to personnel having qualifications required for the assignments. The QAM, and personnel reporting to him, have the authority to order that work be stopped on any operation they find being performed contrary to approved procedures, specifications, instructions, or drawings. 49

The NHY Construction Director reports to the Senior Vice President of NHY and is responsible for managing all field personnel, thus ensuring that all construction-related activities are properly completed. The Construction Director is charged with the responsibility for completing the field construction activities in accordance with corporate guidelines, ~~project plans and schedules~~, project objectives, engineering drawings, specification, instructions, and procedures.

The Construction Director is responsible for performing the full range of management functions, including organizing, staffing, directing, leading and controlling the work of the assigned field personnel and contractors, as well as serving as the focal point for all groups involved with the construction-related work at the jobsite, both within and outside New Hampshire Yankee.

The Director of Engineering and Licensing reports to the Senior Vice President (NHY) and is responsible for providing direction and selected review of all project engineering, design, and NRC licensing work performed; for ensuring that the project engineering organization receives consistent direction and guidance, ensuring consistent and acceptable quality throughout the engineering organization; and for evaluating the impact of regulatory changes to the project. 53

The UE&C organization is described in Topical Report No. UEC-TR-001. The WRD organization is described in the Westinghouse WRD Quality Assurance Plan (WCAP-8370).

and WRD

The interface between YAEC, ~~and UE&C quality management~~ is shown in Figure ~~17.1-1~~. The YAEC Construction Quality Assurance Manager has direct ~~communication with Westinghouse and UE&C~~ regarding quality-related activities. YAEC reviews and concurs with all quality-related procedures, programs, plans, etc. that are generated by the AE (UE&C). YAEC reviews and concurs with the Westinghouse QA Topical Report and reviews department procedures in the process of auditing Westinghouse performance.

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Project authority over the WRD QA Manager and the UE&C Reliability and QA Manager

17.1-1A

The contractors are responsible for the review and approval of their supplier and subcontractor quality related documents. The adequacy of the contractors' reviews are verified by YAEC audit and/or surveillance either at contractors' facilities or at the facilities of supplier and subcontractors. Audit and/or surveillance of contractors (AE) and suppliers is performed by YAEC home office personnel. Surveillance of subcontractors at the construction site is performed by the YAEC QA representatives assigned to the site. Audit at the construction site will be performed by YAEC home office QA personnel.

b. Responsible Management Levels

Public Service Company of New Hampshire, has overall responsibility for quality assurance on the Seabrook Project. The Chief Executive Officer of PSNH has delegated to YAEC the responsibility for establishment and implementation of the Quality Assurance Program. He, or his staff, maintains cognizance of and evaluates the Program activities in the following manner.

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1. Review and approval of the YAEC Quality Assurance Program as described in the Seabrook Station Quality Assurance Manual.
2. Participates in major QA decisions and program changes.
3. Receives copies of all YAEC audit reports (internal and external) pertaining to the Project. Monthly he receives the Status of Outstanding Items indicating the status of audit findings.
4. Participates on a quarterly basis in selected external audits by YAEC to assess YAEC performance in contractor activities. As an alternate to participating in the audit, they may review YAEC external audit reports. The diversity of audits

Figure 17.1-1A depicts the managerial and quality assurance lines of authority, audit and communication between YAEC, NHYD, WRD and UE&C and within these organizations. It also depicts responsibility to audit vendors and manufacturing divisions.

of safety related equipment is performed by either UE&C or Westinghouse under the provisions of their topical reports and QA Programs. These are reviewed and concurred upon by YAEC personnel. Compliance to the aforementioned is assured via a system of audits performed by YAEC Home Office personnel who also review the UE&C and Westinghouse in-house departmental procedures. UE&C and WRD, and their vendors and subcontractors who are responsible for safety-related components or structures, are required to have quality assurance programs consistent with the requirements of 10CFR50 Appendix B, and of this Program.

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The UE&C and WRD quality assurance programs are extensions of the YAEC program and as such have been reviewed and accepted by YAEC. The structure of the UE&C quality assurance organization is described in the UE&C Quality Assurance Program (Topical Report No. UE&C-TR-001) and referenced in Section 17.1.2 of this FSAR. The structure of the WRD quality assurance organization is described in the Westinghouse NES Divisions' Quality Assurance Plan Topical Report (WCAP-8370) and referenced in Section 17.1.3 of this FSAR. Both Topical Reports have been reviewed and approved by the Nuclear Regulatory Commission.

management NHYD

Conformance to approved requirements and programs is assured through close liaison between the Project Managers of YAEC, WRD and UE&C and between their quality assurance organizations.

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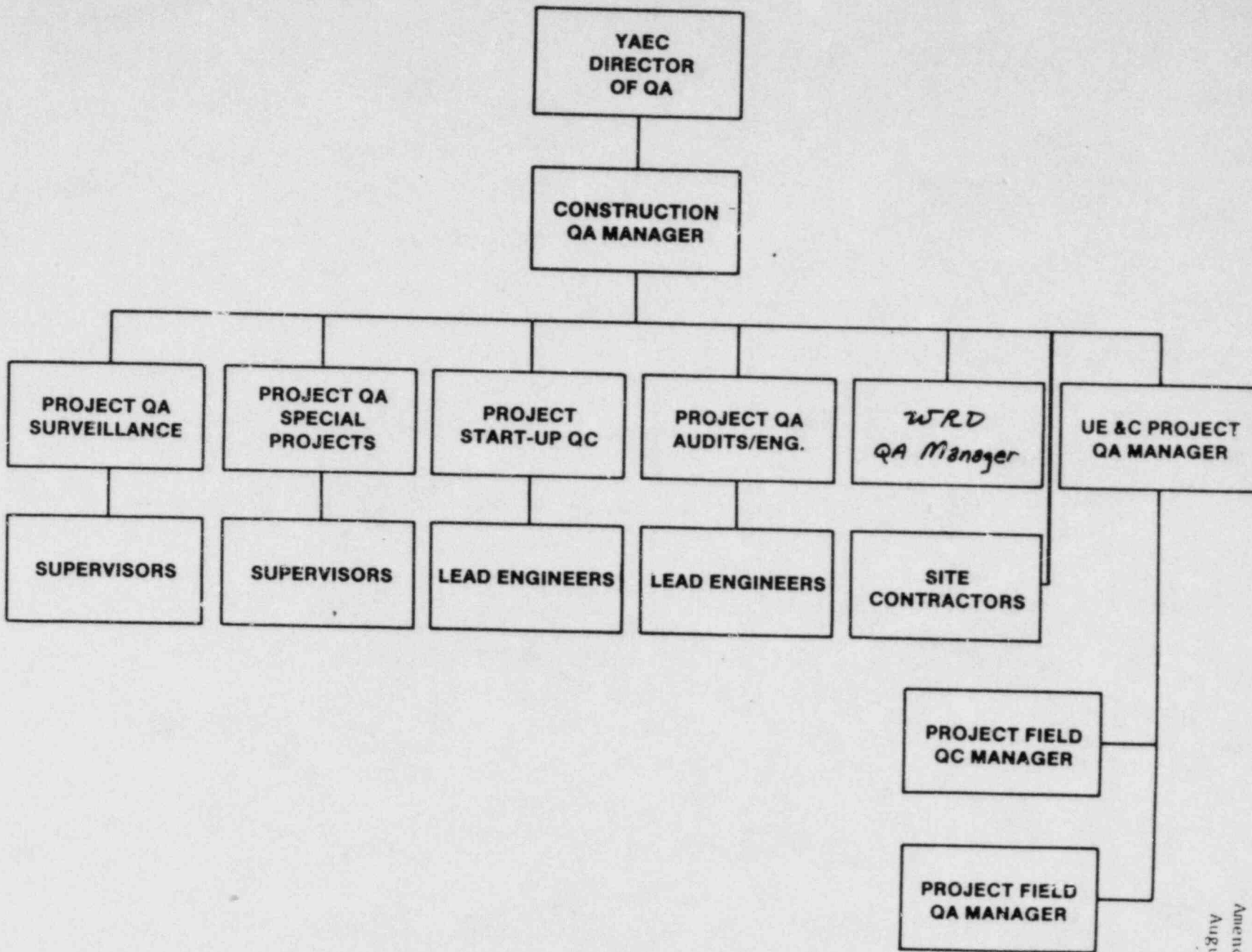
YAEC maintains control of contractor and internal quality-related activities principally by means of an audit and surveillance program which involves audits, surveys, investigations and reviews by the YAEC Project staff, Engineering, Quality Assurance, and Site Quality Assurance.

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17.1.1.2 Quality Assurance Program

In order to assure overall implementation of the quality assurance requirements, YAEC has developed a Program which covers quality-related activities during design, purchasing, fabrication, construction, and preoperational testing which affects those structures, systems and components that are necessary to assure the integrity of the reactor coolant pressure boundary, the capability to shut down the reactor and

Interface between YAEC, UE&C and WRD is depicted in Figure 17.1-1 as is the line of authority over the contractors to assure necessary coordination and control of the Quality Assurance Program.



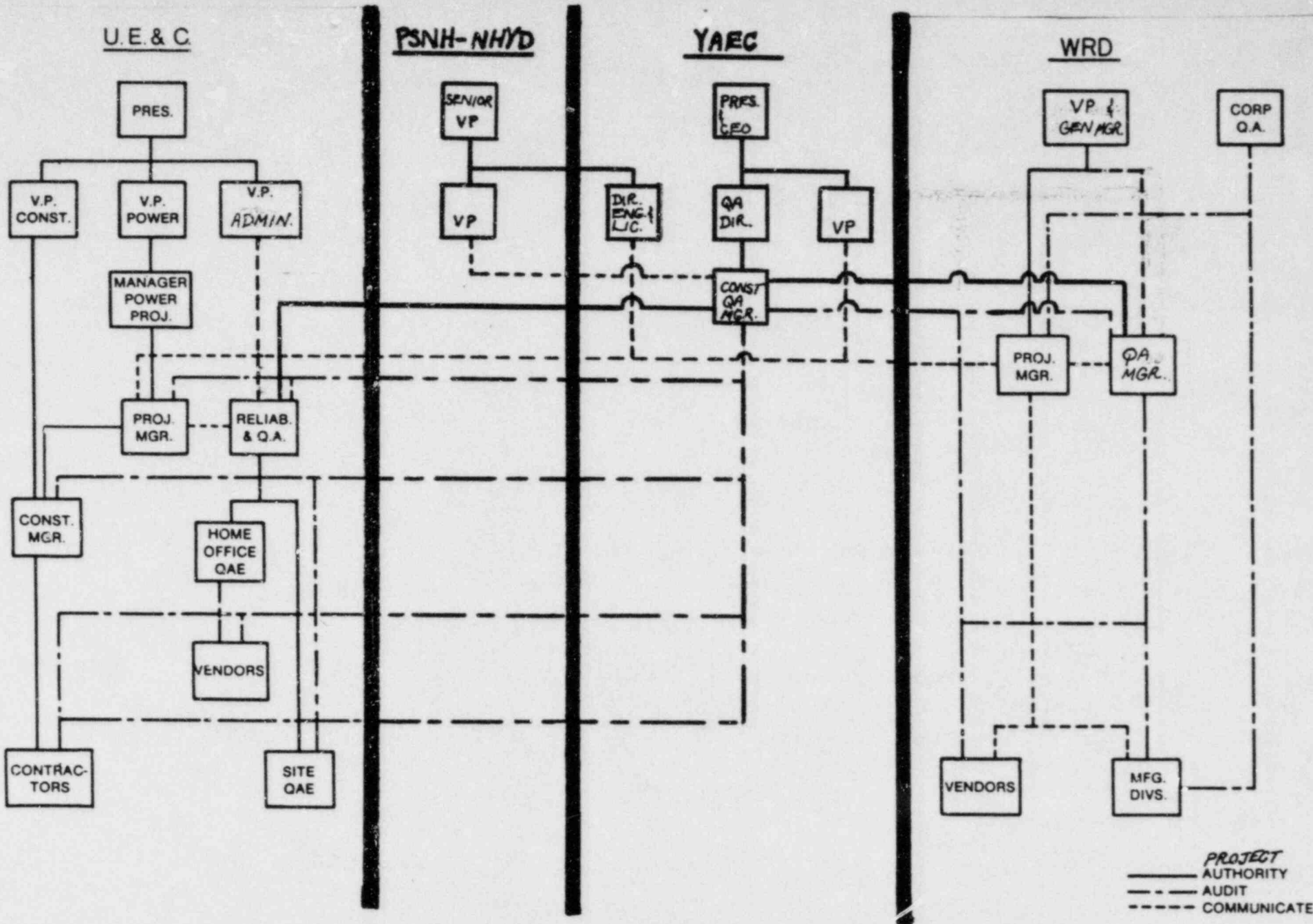


Figure 17.1-1A
 Composite Quality Assurance
 Interfaces