



United States  
Nuclear Regulatory Commission

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# Report of Investigation

SAN ONOFRE NUCLEAR GENERATING STATION,  
UNIT 2:

FAILURE TO FOLLOW PROCEDURES BY  
PERFORMING ELECTRICAL MAINTENANCE  
WITHOUT A WORK ORDER

Office of Investigations

Reported by OI:RIV

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
OFFICE OF INVESTIGATIONS FIELD OFFICE, REGION IV  
612 EAST LAMAR BLVD, SUITE 400  
ARLINGTON, TEXAS 76011-4125

December 3, 2010

MEMORANDUM TO: Elmo E. Collins, Regional Administrator  
Region IV

FROM: Crystal D. Holland, Director   
Office of Investigations Field Office, Region IV

SUBJECT: SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 2 –  
FAILURE TO FOLLOW PROCEDURES BY PERFORMING  
ELECTRICAL MAINTENANCE WITHOUT A WORK ORDER  
(CASE NO. 4-2010-034/RIV-2010-A-0027)

Enclosed, for whatever action you deem appropriate, is the Office of Investigations (OI) Report of Investigation concerning the above matter.

Please note that documents may have been gathered during the course of the investigation that are not included in either the report or the exhibits. This additional documentation will be maintained in the OI case file and available for the staff's review upon request.

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Enclosure:

cc w/enclosure:  
R. Zimmerman, OE

cc w/o enclosure:  
C. Scott, OGC  
E. Leeds, NRR (Attn: L. James, OAC, NRR)

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Distribution:  
s/f (4-2010-034)  
c/f  
(b)(7)(C) OI:HQ

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DATE	12-1-2010	12/01/2010		

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Title: SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 2  
FAILURE TO FOLLOW PROCEDURES BY PERFORMING ELECTRICAL  
MAINTENANCE WITHOUT A WORK ORDER

Licensee:

Southern California Edison Company  
P.O. Box 128  
San Clemente, CA 92674-0128

Docket No.: 50-00361

Allegation No.: RIV-2010-A-0027

Reported by:

(b)(7)(C)

(b)(7)(C)

Special Agent  
Office of Investigations  
Field Office, Region IV

Case No.: 4-2010-034

Report Date: December 3, 2010

Control Office: OI:RIV

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Reviewed and Approved by:

*Crystal Holland*

Crystal Holland, Director  
Office of Investigations  
Field Office, Region IV

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SYNOPSIS

This investigation was initiated on March 8, 2010, by the United States Nuclear Regulatory Commission, Office of Investigations, Region IV, to determine if (b)(7)(C) at Southern California Edison's San Onofre Nuclear Generating Station (SONGS), San Clemente, California, willfully violated procedures by performing electrical maintenance without a work order; if (b)(7)(C) at SONGS willfully falsified signatures on documentation to be compliant with regulatory requirements; and if a SONGS (b)(7)(C) willfully provided incomplete and inaccurate information by cancelling a written notification which documented that maintenance had been performed without a work order.

Based on the evidence developed during this investigation, the allegation that SONGS (b)(7)(C) willfully violated procedures by performing electrical maintenance without a work order was not substantiated.

Based on the evidence developed during this investigation, the allegation that SONGS (b)(7)(C) willfully falsified signatures on documentation to be compliant with regulatory requirements was not substantiated.

Based on the evidence developed during this investigation, the allegation that a SONGS (b)(7)(C) willfully provided incomplete and inaccurate information by cancelling a written notification which documented that maintenance had been performed without a work order was not substantiated.

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LIST OF INTERVIEWEES

Exhibit

7c

(b)(7)(C)	San Onofre Nuclear Generating Station (SONGS), San Clemente, California .....	13
(b)(7)(C)	Kennesaw, Georgia .....	17
(b)(7)(C)	U.S. Nuclear Regulatory Commission, Arkansas Nuclear One, Russellville, Arkansas .....	3
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**DETAILS OF INVESTIGATION**

Applicable Regulations

10 CFR 50.5: Deliberate misconduct (2010 Edition) (Allegation Nos. 1, 2 & 3)

10 CFR 50.9: Completeness and accuracy of information (2010 Edition) (Allegation No. 3)

Technical Specification 5.5.1.1.A: Implementation of written procedures

Regulatory Guide 1.33: Requirement for written procedures

Purpose of Investigation

7c This investigation was initiated on March 8, 2010, by the United States Nuclear Regulatory Commission (NRC), Office of Investigations (OI), Region IV (RIV), to determine if (b)(7)(C) at Southern California Edison's San Onofre Nuclear Generating Station (SONGS), San Clemente, California, willfully violated procedures by performing electrical maintenance without a work order; if (b)(7)(C) at SONGS willfully falsified signatures on documentation to be compliant with regulatory requirements; and if (b)(7)(C) SONGS, willfully provided incomplete and inaccurate information by cancelling a written notification which documented that maintenance had been performed without a work order [Allegation No. RIV-2010-0027] (Exhibit 1).

Background

On February 8, 2010, (b)(7)(C) SONGS, RIV, NRC, received an anonymous allegation that a (b)(7)(C) SONGS failed to follow procedures while performing electrical maintenance on safety-related components.

7c According to the allegor, (b)(7)(C) performed electrical maintenance and modifications to safety-related components without the required work order and later falsified signatures on the documentation to reflect that the work was completed in accordance with the procedures. (b)(7)(C) Notification (b)(7)(C) (b)(7)(C) to document noncompliance with maintenance procedures and to report that the maintenance work had been performed without a work order. Further, (b)(7)(C) later canceled the notification, because he determined that the maintenance work had been performed "correctly" and therefore was "not an issue."

On March 2, 2010, the Allegation Review Board (ARB), RIV, convened to discuss the allegations and requested that OI:RIV, initiate an investigation to determine whether SONGS willfully violated procedures by failing to follow procedures by performing electrical maintenance without a work order and then falsified signatures on documentation to be compliant with the regulatory requirements; and whether a (b)(7)(C) willfully provided incomplete and inaccurate information by cancelling a written notification which documented that maintenance had been performed

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without a work order (Exhibit 2).

Coordination with NRC Staff

On May 19, 2010, (b)(7)(C) Arkansas Nuclear One, was interviewed in Russellville, Arkansas (Exhibit 3). (b)(7)(C) was performing (b)(7)(C) when this issue was identified, and he was assigned to conduct inquiries into the allegation. (b)(7)(C) stated the issue dealt with Containment Sump Discharge Isolation Valve (b)(7)(C). (b)(7)(C) stated the allegation concerned, "work that was done outside of the station's work process or work control process which specifically work had been done on a piece of safety-related equipment without the proper implementing work orders" (Exhibit 3, p. 3). (b)(7)(C) stated he collected the proper paperwork and notifications regarding the issue, and stated he was able to determine that on (b)(7)(C) (b)(7)(C) discovered a lead wire was terminated incorrectly on Valve (b)(7)(C) while they were conducting unrelated work on the valve under Work Order (b)(7)(C). The (b)(7)(C) prepared a notification to implement an Engineering Change Package (ECP) to correct the issue. (b)(7)(C) stated the ECP was implemented on (b)(7)(C) and the lead wire was corrected on the same date, (b)(7)(C). (b)(7)(C) stated that while the (b)(7)(C) were attempting to close out the original work order for Valve (b)(7)(C) (b)(7)(C) they discovered the system would not allow them to close out the work order because they had conducted work outside the guidelines of what the original work order stated. (b)(7)(C) stated a new work order, Work Order No. (b)(7)(C) was generated on (b)(7)(C) to cover the work that had already been completed on (b)(7)(C). According to (b)(7)(C) the new (b)(7)(C) work order (b)(7)(C) was worded as though the work was going to be conducted, not like the work had already been conducted (Exhibit 3, pp. 3-9). (b)(7)(C) stated, "So on the 26<sup>th</sup> [January], the planner created Work Order (b)(7)(C) to implement the ECP and then issued it to the workers on the (b)(7)(C). They took the information from the work that had been done on the (b)(7)(C) entered in into this work order and then closed out all work orders" (Exhibit 3, p. 10).

(b)(7)(C) According to (b)(7)(C), the (b)(7)(C) conducted the work under a temporary alteration and restoration procedure at SONGS known as a 15.3 procedure. (b)(7)(C) stated the work done on Valve (b)(7)(C) was a permanent fix, therefore it could not be done utilizing Procedure 15.3 (Exhibit 3, pp. 11-14). (b)(7)(C) stated he met with SONGS design engineering who looked into the matter, and, according to (b)(7)(C) they concluded nothing wrong had been done. According to (b)(7)(C) design engineering did not seem to be aware of what Procedure 15.3 fully stated (Exhibit 3, pp. 15 and 16).

Allegation No. 1: Failure by (b)(7)(C) to Follow Procedures by Performing Electrical Maintenance Without a Work Order

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Evidence

Document Review

During the course of this investigation, OI:RIV reviewed and evaluated documents provided by SONGS and/or the NRC:RIV staff. The documents deemed relevant to this investigation are represented in this section:

SONGS Notification (b)(7)(C) (Exhibit 4)

This document was prepared after it was determined that employees from (b)(7)(C) a SONGS (b)(7)(C) working within SONGS Unit 2, conducted work on Valve (b)(7)(C) without the proper Nuclear Engineering Change Package (NECP) and work order.

SONGS Work Order No. (b)(7)(C) (Exhibit 5)

Original work order prepared by (b)(7)(C) SONGS, which indicated the initial work to be done on Valve (b)(7)(C). According to this work order, (b)(7)(C) were to remove actuator for determ/reterm work. No repair work was indicated on this work order.

SONGS Temporary System Alteration and Restoration Form, dated (b)(7)(C) (Exhibit 6)

This document was utilized by (b)(7)(C) to conduct the initial work on Valve (b)(7)(C) and also indicated a problem found with a lead wire on the valve on (b)(7)(C).

SONGS Engineering Change Package (b)(7)(C) (Exhibit 7)

This document was implemented by SONGS Engineering Division on January 21, 2010, after it was discovered a lead wire was incorrectly laid within Valve (b)(7)(C). This document provided a revision to correct the wire's location.

SONGS Temporary System Alteration and Restoration Form, dated (b)(7)(C) (Exhibit 8)

This document indicates that work to repair the problem with the lead wire was conducted on January 25, 2010 by (b)(7)(C).

SONGS Procedure SO123-XXIV-10.1, Revision 21, dated March 12, 2010 (Exhibit 9)

This document provides guidance for properly implementing changes to safety-related equipment at SONGS. Section 6.2.1.3 of the guidance states, "The RE [responsible engineer] should verify that the implementing NMO [work order] has been scheduled for field implementation. If the NMO has not been scheduled, contact work control to have the work scheduled" (Exhibit 9, p. 10).

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SONGS Procedure SO123-II-15.3, Revision 17, dated April 17, 2009 (Exhibit 10)

This document provides guidance on temporary system alteration and restoration. (b)(7)(C) (b)(7)(C) used this guidance to repair the lead wire on Valve (b)(7)(C) however, it was determined that the repair was not temporary in nature so this guidance should not have been followed. Section 1.1.1.1 of the guidance states, "This procedure is not applicable when alterations are permanent (for example: Temporary Engineering Change Package [Temporary ECP] or Engineering Change Package [ECP]. The ECP package co-ordinates the installation, verification, Post-Maintenance Verification Testing (PMV) requirements and MAY use an alternate method for tracking changes and verifying tightness of electrical connections" (Exhibit 10, p. 2).

SONGS Work Order (b)(7)(C) (Exhibit 11)

7c This work order, prepared by (b)(7)(C) was prepared to account for the lead wire repair that was conducted on Valve (b)(7)(C) on (b)(7)(C). This work order was prepared on (b)(7)(C) subsequent to the completion of the aforementioned work on Valve (b)(7)(C).

Email Correspondence between (b)(7)(C) and (b)(7)(C) dated (b)(7)(C) (Exhibit 12)

7c In this email, (b)(7)(C) questioned (b)(7)(C) about why the work conducted on Valve (b)(7)(C) on (b)(7)(C) could not be accounted for on the original work order instead of having a new work order generated. (b)(7)(C) advised creating a new work order was the proper SONGS procedure to stay within the process.

Testimony

Interview of (b)(7)(C) (Exhibit 13)

7c (b)(7)(C) On August 11, 2010, (b)(7)(C) SONGS, was interviewed at SONGS by OI:RIV and (b)(7)(C) and related the following information in substance.

7c (b)(7)(C) recalled the incident in January 2010, where work was conducted on a lead wire on Valve (b)(7)(C) prior to the proper work order being issued. (b)(7)(C) stated that initially, SONGS was under the impression that nothing improper was done, stating, "We sent it [potential violation] to our ECP folks, many of the assignments, "did this violate ECP process" and they came back and said "No" (Exhibit 13, p. 7). (b)(7)(C) stated that in his opinion, there was a logic in what was done and the work that was done was documented very well. (b)(7)(C) also stated the (b)(7)(C) implemented the Temporary Modification Procedure 15.3 to affect the repair believing, as did some in SONGS management, that procedure was the correct one to use. (b)(7)(C) stated (b)(7)(C) followed procedure as they understood it during the ECP process, but admitted they did not wait for the work order to be drafted prior to completing the work on the lead wire that needed to be laid (Exhibit 13, pp. 8-15).

7c (b)(7)(C) agreed that the initial issue with the lead wire was found by (b)(7)(C) on (b)(7)(C) and an ECP was initiated on that date. (b)(7)(C) further agreed

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that the ECP was completed shortly after it was submitted, and on (b)(7)(C) the work on the lead wire was completed by (b)(7)(C). Additionally, (b)(7)(C) agreed the accompanying work order for the work completed on (b)(7)(C) which should have been completed prior to the work being conducted, was not completed until (b)(7)(C) added, "Yes, the appropriate thing would have been to have the work order before they landed the lead [wire]" (Exhibit 13, p.17).

Interview of (b)(7)(C) (Exhibit 14)

On August 11, 2010, (b)(7)(C) was interviewed at SONGS by OI:RIV and (b)(7)(C) and related the following information in substance.

(b)(7)(C) recalled the incident involving work being conducted on Valve (b)(7)(C) without prior work order authorization. (b)(7)(C) recalled speaking with (b)(7)(C) on (b)(7)(C) who contacted him (b)(7)(C) regarding work on Valve (b)(7)(C). According to what (b)(7)(C) recalled, (b)(7)(C) notified him of the lead wire work they conducted on the aforementioned valve, to which (b)(7)(C) responded to (b)(7)(C) by telling him (b)(7)(C) that he did not have the appropriate work order to conduct work on the lead wire. (b)(7)(C) stated (b)(7)(C) wanted him to include the work that was conducted in the existing work order instead of creating a new work order. (b)(7)(C) stated (b)(7)(C) told him he (b)(7)(C) was in agreement with (b)(7)(C) about that request. (b)(7)(C) stated he advised (b)(7)(C) "the process the way I understand it doesn't work that way" (Exhibit 14, pp. 4-6). (b)(7)(C) further explained when (b)(7)(C) found the lead wire issue with Valve (b)(7)(C) "They (b)(7)(C) should have called me to contact Engineering to generate an order to allow the modification of the reliner" (Exhibit 14, p. 7).

(b)(7)(C) stated he did draft a new work order after the work had already been conducted. (b)(7)(C) said he was contacted by both (b)(7)(C) and (b)(7)(C) regarding the work order. (b)(7)(C) said (b)(7)(C) inquired as to why the work on the lead wire could not be included in with the original work order (b)(7)(C) and (b)(7)(C) stated he told (b)(7)(C) "No, it doesn't work that way. I have to go back to the - The best way to do it is go back to the ECP, generate the order" (Exhibit 14, pp. 9 and 10). (b)(7)(C) stated he prepared the second work order for the lead wire work done on Valve (b)(7)(C) on (b)(7)(C) and was put into the system on (b)(7)(C). (b)(7)(C) stated he and (b)(7)(C) exchanged an email wherein this issue was discussed and (b)(7)(C) explained to (b)(7)(C) that adding work to an existing work order could not be done, a new work order would have to be generated (Exhibit 12).

Interview of (b)(7)(C) (Exhibit 15)

On August 12, 2010, (b)(7)(C) was interviewed at SONGS by OI:RIV and (b)(7)(C) and related the following information in substance.

(b)(7)(C) stated that in January 2010, he was (b)(7)(C) and was initially notified of the lead wire problem with Valve (b)(7)(C) on approximately (b)(7)(C). (b)(7)(C) stated he was notified by (b)(7)(C) who advised him a notification had already been written on the issue. (b)(7)(C) said he did not give an initial direction because a notification had been written, and the Engineering Department was made aware of it.

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7c (b)(7)(C) said his initial understanding of the issue was that with lead wire was restored in accordance with Procedure 15.3, and, according to (b)(7)(C) at that time he was under the impression that was the correct method to use. (b)(7)(C) agreed that the work was conducted on (b)(7)(C) and the work order was subsequently written on (b)(7)(C). (b)(7)(C) stated that in past years it was common practice when similar issues arose to conduct the necessary work and revise the work document as necessary. According to (b)(7)(C) the old documentation system at SONGS, formerly known as MOSAIC, allowed for changes in the system without creating new work orders. (b)(7)(C) stated that practice was no longer allowed (Exhibit 15, pp. 9-15).

7c (b)(7)(C) was provided a copy of an email exchange between him and (b)(7)(C) (Exhibit 12) regarding a request from him (b)(7)(C) to add the work done on the lead wire to the original work order (b)(7)(C). After reviewing the email, (b)(7)(C) stated the request came from him, however, he did not remember the email exchange and could offer no additional information on it.

7c Regarding the current procedure for conducting work on safety-related equipment, when asked if preparing a work order after the work had already been completed was a violation of SONGS procedure, (b)(7)(C) answered, "Yes, it was" (Exhibit 15, p. 16).

7c (b)(7)(C) stated he lacked an intimate understanding of the ECP procedures. (b)(7)(C) stated those issues normally fell under the responsibility of planning, and he did not get deeply involved in planning functions. (b)(7)(C) said the order that was generated in this instance was generated as part of the ECP process; therefore, he was under the impression Procedure 15.3 was the correct procedure to use. According to (b)(7)(C) "I have since gained some knowledge of the ECP procedure" (Exhibit 15, pp. 19 and 20). (b)(7)(C) acknowledged, "This is not the first time that we have done this, although clearly it was the incorrect way to do that even in the past. But I mean this is their – You know, that's the way we used to do work" (Exhibit 15, pp. 21 and 22). (b)(7)(C) ended his interview by stating, "I think I've already indicated... we're going to do business different moving forward now that all this has come to light (Exhibit 15, pp. 26 and 27).

7c Interview of (b)(7)(C) (Exhibit 16)

On September 14, 2010 (b)(7)(C) was interviewed in Arlington, Texas by OI:RIV, and related the following information in substance.

7c (b)(7)(C) vaguely recalled the incident involving work being conducted on Valve (b)(7)(C) at SONGS in January 2010. (b)(7)(C) recalled the lead wire on the valve being incorrectly laid, and recalled relanding the wire in the correct location. (b)(7)(C) stated the normal process for repairing safety related equipment was to write a notification to address the issue. According to (b)(7)(C) (b)(7)(C) normally wrote the appropriate notifications and dealt with (b)(7)(C) on most matters. From what (b)(7)(C) recalled, (b)(7)(C) gave the authority to fix the problem, however (b)(7)(C) was unaware of the process that was utilized to remedy the situation (Exhibit 16, pp. 6-14).

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Interview of (b)(7)(C) (Exhibit 17)

On September 15, 2010, (b)(7)(C) was interviewed at SONGS by OI:RIV and related the following information in substance.

(b)(7)(C) recalled working on Valve (b)(7)(C) in January 2010, stating he was tasked with conducting an inspection on that valve because SONGS was observing negative trending from it. (b)(7)(C) stated that on (b)(7)(C) while conducting work on the aforementioned valve, it was noted that a lead wire was incorrectly terminated. (b)(7)(C) stated he wrote a notification regarding the issue, and the process was initiated to institute an ECP, which would indicate the correct location for the lead wire. (b)(7)(C) stated it was his understanding that once the ECP was instituted, a SONGS Planner would create a work order to conduct the work (Exhibit 17, pp. 6-10).

(b)(7)(C) agreed that between the time the problem was identified and presented for an ECP, where a new drawing was created, and prior to the new work order being created, he and (b)(7)(C) conducted the work on the valve. (b)(7)(C) stated, "The fact that the drawing existed would have meant that the NECEP package would have already been approved. We just didn't have an ECPD order that said go ahead and make that installation" (Exhibit 17, p. 11). According to (b)(7)(C) the decision to conduct the work prior to the work order being completed was made by (b)(7)(C) in coordination with (b)(7)(C). (b)(7)(C) stated they had conducted business like that in the past, but stated, although the work had been completed, they would not release the equipment back to SONGS until they had the work order in hand (Exhibit 17, p. 12-16).

(b)(7)(C) confirmed the work on Valve (b)(7)(C) was conducted on (b)(7)(C) and the approved work order to perform the work was not completed until "the (b)(7)(C)" (Exhibit 17, p. 14).

(b)(7)(C) stated he also spoke with (b)(7)(C) regarding the repair made to Valve (b)(7)(C). (b)(7)(C) stated he told (b)(7)(C) the work on the valve was conducted under the original work order. (b)(7)(C) said the upon hearing that, (b)(7)(C) expressed his discontent, nothing other than his tone of voice, that we already performed the work without waiting for the ECP order". (b)(7)(C) stated (b)(7)(C) later wrote a notification that they (b)(7)(C) had conducted work outside the work process (Exhibit 17, p. 21).

Agent's Analysis

This investigation was initiated, in part, to determine if SONGS (b)(7)(C) willfully violated procedures by performing electrical maintenance without with a work order. Testimonial and documentary evidence clearly shows work conducted on Valve (b)(7)(C) on (b)(7)(C) 2010, to reland a lead wire was conducted prior to an approved work order being generated. SONGS Procedure SO123-XXIV-10.1, Section 6.2.1.3 of the guidance states, "The RE [responsible engineer] should verify that the implementing NMO [work order] has been scheduled for field implementation. If the NMO has not been scheduled, contact work control to have the work scheduled" (Exhibit 9, p. 10). This procedural step was not followed when

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initiating work on Valve (b)(7)(C) on (b)(7)(C)

7c During their testimony, (b)(7)(C) and (b)(7)(C) stated they were under the impression the work conducted on Valve (b)(7)(C) on (b)(7)(C) could be performed utilizing SONGS procedure SONGS Procedure SO123-II-15.3, which provides guidance for temporary alteration and restoration of safety related equipment (Exhibits 13, 15, 17). However, Procedure 15.3 guidance states, "This procedure is not applicable when alterations are permanent (for example: Temporary Engineering Change Package [Temporary ECP] or Engineering Change Package [ECP]. The ECP package co-ordinates the installation, verification, PMV testing requirements and MAY use an alternate method for tracking changes and verifying tightness of electrical connections" (Exhibit 10, p. 2). It was determined that the work done on Valve (b)(7)(C) on (b)(7)(C) was permanent, not temporary.

7c During his testimony (b)(7)(C) who authorized the repairs to be conducted on Valve (b)(7)(C) prior to the work order being generated, admitted the work was done prior to a work order being prepared, but stated he lacked an intimate understanding of the ECP procedures. (b)(7)(C) admitted work had been conducted in a similar manner in the past, but advised that since this issue surfaced, he has gained a better working knowledge of the ECP process and stated work would be conducted differently in the future (Exhibit 15, pp. 9-22).

7c In summary, (b)(7)(C) did conduct work on Valve (b)(7)(C) on (b)(7)(C) 2010, prior to receiving a work order (which was prepared on (b)(7)(C) authorizing them to do so. Both (b)(7)(C) and (b)(7)(C) stated that practice had been employed in the past, and both felt at the time the work was conducted, they were working within the confines of the system. (b)(7)(C) who authorized the work from SONGS' standpoint, stated he was not very familiar with the ECP process, and thought by working within the Procedure 15.3 temporary modification process, the work on Valve (b)(7)(C) on (b)(7)(C) would be covered. (b)(7)(C) also believed the Procedure 15.3 temporary modification process would cover the work that was conducted. Testimonial evidence further disclosed that the customary practice at SONGS permitted, on occasion, contract employees to perform electrical maintenance work prior to issuance of the work order.

#### Conclusions

Based on the evidence developed during the investigation, the allegation that SONGS (b)(7)(C) (b)(7)(C) willfully violated procedures by performing electrical maintenance without with a work order was not substantiated.

#### Allegation No. 2: Falsification of Signatures on Documentation to be Compliant with Regulatory Requirements

#### Agent's Analysis

This investigation was initiated, in part, to determine if SONGS (b)(7)(C) willfully falsified signatures on documentation to be compliant with regulatory requirements. During the course of this investigation, no evidence was uncovered which indicated signatures on any

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documentation regarding this issue were falsified. Signatures on documents obtained were verified by the individuals who signed them.

Conclusions

Based on the evidence developed during this investigation, the allegation that SONGS (b)(7)(C) willfully falsified signatures on documentation to be compliant with regulatory requirements was not substantiated.

Allegation No. 3: (b)(7)(C) Provided Incomplete and Inaccurate Information by Cancelling a Written Notification Which Documented that Maintenance had been performed without a Work Order

Agent's Analysis

7c This investigation was initiated, in part, to determine if (b)(7)(C) willfully provided incomplete and inaccurate information by cancelling a written notification which documented that maintenance had been performed without a work order. In Notification (b)(7)(C) It stated, in part, "Craft implemented NECP (b)(7)(C) on (b)(7)(C) outside the work process without an NECP order. Order (b)(7)(C) was created after the implementation to ensure proper review/implementation" (Exhibit 4, p. 1). (b)(7)(C) wrote, within the same notification, "There was nothing done incorrectly. The way the work was performed considered ALARA and work process. An NN was generated to create an order to track the rewiring and correct Wiring Diagram. The "WCA/WCD" was maintained open until the order was generated to document the wiring change. Cancel the LLEI" (Exhibit 4, p. 5).

7c During his testimony, (b)(7)(C) stated he did not cancel the Notification (b)(7)(C). According to (b)(7)(C) he was assigned a task within the notification to conduct a low level error investigation. (b)(7)(C) stated, with regards to his notification tasking, "If that were the only task that was assigned to the notification, then the notification could have been closed. I don't believe they cancelled notifications" (Exhibit 15, pp 17 and 18). Regarding wording he used on the notification, (b)(7)(C) stated that was his understanding of the process at the time he answer his tasking on the notification. (b)(7)(C) said, "At the time when I closed this assignment, I thought we had worked within the process" (Exhibit 15, p. 19).

7c On August 11, 2010, (b)(7)(C) SONGS, was interviewed at SONGS by OI:RIV and (b)(7)(C) (Exhibit 18). (b)(7)(C) was listed as the responsible party relative to Notification (b)(7)(C) stated that as the responsible party on a notification, he had no responsibility to investigate the issue; he only assigned a cause evaluation to the human performance aspect of the issue, which went to (b)(7)(C). According to (b)(7)(C) (b)(7)(C) completed his assignment, but did not cancel the notification. (b)(7)(C) stated that at the time the notification was written, there was no guidance for cancelling notifications. (b)(7)(C) stated that during the time frame in which that notification was written, if SONGS management felt an issue was important the significance level would be raised. If it was felt the issue was not important, the significance level would be lowered (Exhibit 16, pp. 8-13).

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7c In summary, (b)(7)(C) stated he did not cancel any part of Notification (b)(7)(C) he only closed the assignment he was given with regards to the work conducted in Valve (b)(7)(C) on (b)(7)(C) (b)(7)(C) stated that during the time frame in which that notification was written, no guidance was in place to cancel notifications at SONGS. (b)(7)(C) said that while significance levels were raised or lowered, notifications were not cancelled.

Conclusions

7c Based on the evidence developed during this investigation, the allegation that (b)(7)(C) willfully provided incomplete and inaccurate information by cancelling a written notification which documented that maintenance had been performed without a work order was not substantiated.

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LIST OF EXHIBITS

Exhibit

No.

Description

- 1 Investigation Status Record, dated March 8, 2010 (1 page).
- 2 Reactor ARB Minutes and related documents, dated March 2, 2010 (9 pages).
- 3 Transcript of Interview with (b)(7)(C) dated May 19, 2010 (17 pages).
- 4 SONGS Notification: (b)(7)(C) (5 pages).
- 5 SONGS Work Order No. (b)(7)(C) (34 pages).
- 6 SONGS Temporary System Alteration and Restoration Form, dated (b)(7)(C) (10 pages).
- 7 SONGS Engineering Change Package (b)(7)(C) (13 pages).
- 8 SONGS Temporary System Alteration and Restoration Form, dated (b)(7)(C) (2 pages).
- 9 SONGS Procedure SO123-XXIV-10.1, Revision 21, dated March 12, 2010 (116 pages).
- 10 SONGS Procedure SO123-II-15.3, Revision 17, dated April 17, 2009 (8 pages).
- 11 SONGS Work Order No. (b)(7)(C) dated (b)(7)(C) (20 pages).
- 7c 12 Email Correspondence between (b)(7)(C) and (b)(7)(C) (b)(7)(C) (1 page).
- 13 Transcript of Interview with (b)(7)(C) dated August 11, 2010 (37 pages).
- 14 Transcript of Interview with (b)(7)(C) dated August 11, 2010 (26 pages).
- 7c 15 Transcript of Interview with (b)(7)(C) dated August 12, 2010 (30 pages).
- 16 Transcript of Interview with (b)(7)(C) dated September 14, 2010 (21 pages).
- 17 Transcript of Interview with (b)(7)(C) dated September 15, 2010 (28 pages).
- 18 Transcript of Interview with (b)(7)(C) dated August 11, 2010 (16 pages).

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