



Washington Public Power Supply System
A JOINT OPERATING AGENCY



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June 8, 1978
G02-78-155

Nuclear Regulatory Commission
Region V
Suite 202 Walnut Creek Plaza
1900 N. California Boulevard
Walnut Creek, California 94596

Attention: Mr. R. H. Engelken
Director

Subject: WPPSS NUCLEAR PROJECT NO. 2 .
DOCKET NUMBER 50-397, CPPR-93
NRC INSPECTION REPORT 50-397/78-01
FALSIFICATION OF RECORDS, WNP-2
FINAL REPORT

Reference: Letter, GI2-78-201, dated May 9, 1978.

Dear Mr. Engelken:

The referenced letter specified the need for corrective action relative to the subject condition at WPPSS Nuclear Project No. 2.

Appendix A to this letter contains the WPPSS final report on falsification of records at WPPSS Nuclear Project No. 2

If you have any questions, or desire further information, please advise.

Very truly yours,

D. L. Renberger

D. L. RENBERGER
Assistant Director
Generation and Technology

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Attachment

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APPENDIX A

NRC INSPECTION REPORT 50-397/78-01
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Background

On February 23, 1978, the Mechanical Contractor's Quality Assurance Department notified the Supply System of a potential suspect record falsification problem. The initial problem surfaced during a documentation review by the Contractor and related to two (2) redundant documentation packages for Quality Class II hangers, AS-28 and AS-121. On February 24, 1978, the Contractor advised the Supply System that they had confirmed the two (2) documentation packages as confirmed forgeries and were conducting an investigation to determine the extent of the problem. The Supply System informed Region V NRC of the incident on February 25, 1978.

The Mechanical Contractor concentrated his initial effort in Quality Class II areas as preliminary information indicated that the problems were caused by increased effort caused by the processing of the winter heat program. Interviews conducted by the Contractor with various contract personnel appeared to confirm this theory.

On February 28 through March 3, 1978, the Supply System initiated action to determine the adequacy of the Contractor's review, possible involvement of Quality Class I hangers, and adequacy of the Contractor's weld filler material control as the predominant deviation up to this date involved the NF-69, Weld Filler Metal Withdrawal. The WPPSS investigation team consisted of two (2) personnel from the WPPSS Quality Assurance staff and one (1) from the Burns and Roe Quality Assurance staff.

The results of the investigation concluded that falsified records did exist in Quality Class I areas and that the concentration by the Contractor in predominantly Quality Class II areas was inappropriate. In addition, the investigation concluded that the Contractor's filler metal control was not in compliance with approved procedures.

On March 2, 1978, the Supply System directed the Contractor to Stop Work on Quality Class I welding on piping and pipe supports. On March 3, 1978, the Supply System issued a detailed listing of prerequisites for resumption of work. The Stop Work Order was lifted on March 9, 1978 after satisfactory completion of all prerequisites by the Contractor and subsequent verification by the Supply System.

Corrective Action

In addition to the prerequisites contained in the Stop Work Order, the following additional actions have been taken to prevent recurrence:

1. Direct management attention by the Supply System and the Contractor.
2. Development of a site generic weld filler metal control procedure.
3. The involved Contractor is currently reviewing his total Quality Assurance program.
4. Appropriate actions have been taken by the Contractor to assure hardware and final records meet all requirements. Basically this action is in the form of a more detailed review of records, more stringent control of weld metal and work packages. In addition, the Contractor is reinspecting all Quality Class I hangers.
5. The Supply System has developed a more indepth surveillance plan to augment the audit system. The surveillance plan will include a comprehensive review of the records and direct correlation to the as-built condition. The audit system will also include a comprehensive review of records and flexibility to increase scope to include review of related hardware whenever significant deficiencies are detected in the records.
6. The Supply System is presently developing a more effective system to determine trends to appraise management of significant conditions.
7. Responsibilities and authority have been redefined and realigned by the Contractor to insure day-to-day control of field records to preclude the problems experienced. The field documentation is now controlled by Quality Control personnel with a newly added Senior Quality Assurance Engineer assigned to their surveillance.
8. A Training Supervisor has been added to the Contractor's staff. He reports directly to the HBG Project Manager. His responsibilities are to coordinate and administer a comprehensive project-wide training program to include the quality as well as technical, safety and administrative requirements. He draws on the expertise of each department to define the needs and frequency of training efforts and to obtain experienced representatives for instruction support as required. The on-going training programs are for presently employed personnel as well as new hires, transfers and promotions. Topics covered include Work Procedures #1 and #86, as well as other Work Procedures, Project Directives, Quality Assurance Program, etc. Records of the topics covered, instructor, attendees, etc. are maintained.
9. Increased emphasis has been placed on the internal audit program by the Contractor. A third QA Auditor experienced in 10CFR50, Appendix "B" audit requirements, has been added to his staff to strengthen the capability for preventing the recurrence of the problems described herein.

Additional Actions

1. In addition to the weld record review, a review of technical Engineering documents relating to the pipe support packages was required and accomplished. This was a joint WPPSS/B&R/WBG Engineering effort by a trained team operating to specific guidelines. The review covered Hanger Field Problems (HFP), Requests for Information (RFI) and Field Change Reports (FCR). The review uncovered no evidence of record falsification.
2. The Supply System has been advised by the involved Contractor that a field engineering clerk and a pipefitter general foreman admitted that they falsified some records, but at the direction of their superintendent; these men are no longer on the Project. The implicated superintendent had voluntarily terminated his employment in early December 1977. He acknowledged having directed some of his crew to "take care of the missing paper," but he denied having instructed anyone to falsify signatures. Other persons interviewed alleged that a former hanger engineering supervisor had falsified some records. He had been involuntarily terminated in early October 1977 and they were unable to interview him.

No other admissions of involvement were obtained nor were any other allegations of any substance made. Attempts to analyze the falsified records to establish a pattern of time, area, crew, shift, supervision, etc. did not produce meaningful results.

Further efforts to attempt identification of others involved do not appear to be justified, in fact they might be counter productive. Unless on-going audits disclose further incidents of this nature, we should consider the personnel involvement facet of the problem closed.

3. The Supply System in letter WNP2WBG-215-F-78-2959 has directed the Contractor to perform an audit of receiving inspection and maintenance of equipment prior to June 15, 1978 to assure that similar deficiencies do not exist in other areas. Quality Assurance personnel from WNP-2 will observe the performance of the Contractor.

Summary of Quality Class I Fraudulent Records Review

Total number of document packages reviewed - 8,500
Average number of documents per package - 5
Total documents reviewed - 42,500

Breakdown of document packages:

Pipe supports - 2,000
Pipe spools - 6,500

Number of data packages containing deficiencies - 2,001

(Many of these deficiencies were minor - administrative errors and incomplete records due to the level of activity were the most common deficiencies.) Missing records will be dispositioned by Inspection Reports by the Contractor. Items requiring reinspection will be inspected to latest revision - WP-65.

Number of fraudulent packages - 88

Number of confirmed authentic signature packages - 29

Number of fraudulent packages in B&R vault at completion of review - 59 (27 of the 59 packages cannot be verified for authentic signatures due to termination of personnel whose signatures are in question. The Contractor has provided Region V NRC Inspectors with the last "home of record" for the personnel involved.) The Contractor has provided a recommended disposition for each record package to our Architect Engineer through the nonconformance report system.

All nonconformances have been returned to the Contractor for appropriate corrective action, as required.

