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 ENGELKEN, R.H. Region 5, San Francisco, Office of the Director

SUBJECT: Final deficiency rept re containment mod QA program
 breakdown, initially reported on 801215. Evaluation concludes
 that Contract 213A QA program breakdown is not reportable
 condition.

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Docket No. 50-397

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Dear Mr. Engelken:

Subject: WPPSS NUCLEAR PROJECT NO. 2
POTENTIALLY REPORTABLE DEFICIENCY - 10CFR50.55(e)
CONTAINMENT MODIFICATION QA PROGRAM BREAKDOWN

Reference: (1) Letter G02-80-299 dated December 15, 1980
RG Matlock to RH Engelken
(2) Letter G02-81-53, dated March 10, 1981,
RG Matlock to RH Engelken

Reference (1) provided notification and a preliminary report regarding the Contract 213A (primary containment modification) QA Program breakdown, which was being evaluated as a potentially reportable deficiency in accordance with 10CFR50.55(e). Reference (2) provided a status report on the results of the evaluation, and reported that no significant design or construction deficiencies which could have adversely affected the safety of operation of the plant had yet been identified.

The preliminary report transmitted by Reference (1) described the documentation review and resolution process involving the Contractor and Architect-Engineer. Although this evaluation effort is not completed, it has progressed to the point where final conclusions can be drawn regarding the reportability of this item as a 10CFR50.55(e) condition. The Supply System evaluation has concluded that the Contract 213A QA Program breakdown, as described in References (1) and (2), is not a reportable condition, and this letter constitutes our final report on this matter. The basis for this conclusion is as follows:

- a. In general, the Contract 213A QA Program breakdown involves documentation deficiencies rather than physical deficiencies. The effect of these deficiencies is an initial lack of verification that materials and welding are acceptable. Through additional research of available documentation, resort to alternative means of verifying adequacy, and reinspection, much of the work for which these documentation deficiencies existed has been judged acceptable. While some minor physical deficiencies have been identified, there is no evidence that materials or welding are incapable of meeting their design function or complying with plant safety requirements.

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- b. The apparent QA Program breakdown identified in Reference (1) can better be characterized as a failure to perform quality verification in a timely manner. The Contractor's QA Program was successful in ultimately identifying the deficiencies, but a more timely quality verification program would have reduced the scope of the problem.
- c. In some cases, ASME Code material traceability, welder identification, and documentation requirements for containment pressure boundary items had been unnecessarily applied to non-ASME structures (downcomer bracing system) and to attachments to containment pressure boundary materials. Consequently, many of the apparent documentation deficiencies initially identified have been determined to be acceptable.

Although the consequences of the Contract 213A QA program breakdown have been determined to be not reportable under the terms of 10CFR50.55(e), corrective action has been taken by the Contractor and the Supply System. The Contractor's Quality Assurance and Quality Control programs have been upgraded, and conditions which led to the loss of process control identified in Reference (1) have been eliminated. In addition, the Supply System has installed an Architect-Engineer Task Force made up of engineering and quality assurance personnel, working directly with the contractor to participate in the identification and resolution of engineering and quality-related problems. With these steps, we consider the conditions which led to the loss of process control identified in Reference (1) to have been corrected.

Very truly yours,

R. G. Matlock
Program Director
WNP-2

EAF:taj

cc:

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