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June 22, 1981

D. L. ASWELL
Vice President-Power Production

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Q-3-A35.02.01

Mr. K. V. Seyfrit, Director, Region IV
U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76012

SUBJECT: Waterford SES Unit 3
IE Inspection Report - 50-382/81-05

Dear Mr. Seyfrit:

The following information regarding the two deviations cited by the USNRC Inspectors in IE Inspection Report No. 50-382/Report 81-05 dated May 4, 1981, is herewith submitted.

1. Failure to Continue Corrective Action Commitment -
Weekly Surveillance Inspection

During a previous inspection, IE Inspection Report No. 50-382/80-06, dated April 4, 1980, the NRC inspector identified an item of noncompliance wherein the licensee's subcontractor failed to follow contract procedures relative to the care and maintenance instructions (CMIs) for the containment penetration assemblies.

The licensee responded to the above violation in a letter dated May 9, 1980. Paragraph 2 of this letter stated, in part, "Corrective Action Taken To Preclude Repetition," "QC will increase surveillance inspections to ensure that CMI requirements are being complied with. Inspections will be conducted on a weekly basis and the results documented."

Contrary to the above:

During this inspection, the NRC inspector observed that the subcontractor's QC department implemented weekly surveillance inspections on April 4, 1980, through May 31, 1980, and documented them on Tompkins-Beckwith's Form No. GP-723-67, "In-Place Storage Surveillance Reports." However, there are no records to indicate that QC surveillance inspections of containment penetrations were conducted from June 1, 1980, to the present (neither on a weekly nor monthly basis).

This is a deviation.

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Corrective Action Taken and the Results Achieved:

Tompkins-Beckwith has uniquely identified each penetration and performed an inspection on each penetration on a monthly basis and documented the results on Form GP-723-67, commencing in March of 1981.

Corrective Action Taken to Preclude Repetition:

Tompkins-Beckwith Quality Control inspectors have been instructed to perform a monthly inspection of each penetration and document the results on Form GP-723-67, preidentified by the unique number assigned to the penetration.

Date When Full Corrective Action Will be Achieved:

Monthly inspections of penetrations were started during March of 1981.

2. Failure to Verify or Evaluate the Acceptability of Inspection and Tests Results

LP&L's commitment to the NRC Green Book, WASH 1309, dated May 10, 1974, is identified in a letter (LPL-7109), LP&L to NRC, dated June 23, 1977, and in the LP&L QA Manual, Section 2.0, Table 2-1. The Green Book, "Guidance in Quality Assurance Requirements During the Construction Phase of Nuclear Power Plants," contains the "Supplementary Quality Assurance Requirements for Installation, Inspection and Testing of Mechanical Equipment and System for the Construction Phase of Nuclear Power Plants," draft ANSI N45.2.8. Section 2.0 of the draft standard, "General Requirements," Subsection 2.3, "Results," states, in part, "Test reports and data sheets include an evaluation of the acceptability of inspection and test results and provide for identifying the individual who performed the evaluation."

Contrary to the above:

- a. Tompkins-Beckwith (T-B) Form GP-723-43, "Tension Test Reports," which reflect tension test results for the T-B Procedure TBP-33, "Procedure for Inspecting Drilled-In Expansion Type Anchors in Seismic Class I Concrete," were not evaluated for acceptability at the conclusion of the inspection/testing activity during the period February 27, 1978 through January 28, 1981.
- b. All tension test reports were considered complete and were being retained in the T-B QA/QC records storage vault prior to final turnover to the licensee.
- c. Of the 115 tension test reports reviewed by the T-B QA supervisor during this IE inspection period, 111 reports were found to have unacceptable discrepancies.

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- d. The T-B cognizant representative indicated that T-B does not have provisions in their QA program procedures for evaluating the acceptability of inspection and test results, nor provides identity of an individual who would perform an evaluation.

This is a deviation.

Corrective Action Taken and the Results Achieved:

The discrepancies found in the il5 anchor bolt test reports have been corrected. The corrected test reports are filed in the T-B records vault.

Corrective Action Taken to Preclude Repetition:

T-B forms, GP-723-42 and GP-723-43, which are utilized to document test results, have been revised to include a Quality Control review and sign-off prior to the documentation being filed in the Quality Assurance vault. T-B Procedure, TBP-33 has been revised (effective 3/31/81) to require this independent review of test results. This review will be performed by an individual certified at least as a Level II inspector.

Date When Full Corrective Action Will be Achieved:

Corrective action has been completed as of March 27, 1981. The use of revised T-B forms GP-723-42 and 43 began on March 27, 1981.

If you have any questions concerning this response, please advise.

Yours very truly,



D. L. Aswell

DLA/LLB/grf

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