

July 13, 1983

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of

CLEVELAND ELECTRIC ILLUMINATING
COMPANY, Et Al.

(Perry Nuclear Power Plant,
Units 1 and 2)

Docket Nos. 50-440
50-441
(Operating License)



MOTION TO REOPEN THE RECORD ON ISSUE #3

Intervenor Ohio Citizens for Responsible Energy ("OCRE") hereby moves the Licensing Board to reopen the record on Issue #3, which concerns the quality assurance of construction at the Perry plant, for the purpose of taking further evidence, which is necessitated by the circumstances described below.

OCRE has recently received documents through the Freedom of Information Act ("FOIA") (see Attachment 1, the NRC's FOIA response) which indicate that the QA deficiencies at Perry, and in particular CEI's control of Comstock, may be much worse than the testimony presented at the recent hearing would lead one to believe. OCRE therefore believes that these documents, which are described below, raise significant questions as to the credibility of Staff and Applicant testimony.

Attachment 2 is Item #35 of Appendix A to the NRC's FOIA response. This document is an engineering change notice dated 5-10-82 concerning cable tray fill. It apparently was generated in response to the NRC's finding in the 81-19 investigation (81-19 report, p. 75, unresolved item No. 440/81-19-14; 441/81-19-14). The problem identified was that

8307190186 830713
PDR ADDCK 05000440
PDR

DS03

control and instrumentation cable trays were filled with cables above the side rails, contrary to the specification requirements (50% and 60% fill). The NRC found that this situation could compromise separation requirements. CEI agreed to address this concern in specifications and procedures to preclude overfill in cable trays.

The subject document, however, does not preclude cable tray overfill, but instead sanctions it. The 50% and 60% fill limits have been totally removed. It is apparent that CEI has "resolved" the NRC's unresolved finding, not by correcting the situation, but instead by rescinding the requirements which were violated, in the name of a "design improvement."^{1/}

Attachment 3 is Item #46 of the FOIA response. This item is a letter, dated August 6, 1982, from the L.K. Comstock task force to Comstock's regional QA/QC manager. Described therein are several concerns, including the certification of inspectors. P. 2 of the letter contains the statement that only 6 out of 22 people signing inspection documents were certified to do so.

Applicants' testimony addressed only a difficulty in obtaining appropriate numbers of QA/QC personnel, and not a problem with their qualifications or certification. They were

^{1/} OCRE believes that this represents a safety problem, that of heat dissipation, in addition to the separation criteria. Article 318 of the National Electrical Code, although not applicable to Perry or to any facility under the control of an electric utility, provides useful guidance on this matter. Article 318 places limitations on the number of cables to be placed in cable trays according to the size of the cables and (continued next page)

obviously aware of this August 6 document. This suggests that they may have withheld information on the severity of the Comstock problem.

Attachment 4 is Item #78 of the FOIA response. It appears to be a list of programmatic deficiencies in CEI's QA program, most probably prepared by a member of the NRC staff. Although it is undated, the statement in item #1 suggests that it is quite recent. OCRE asserts that the existence of this document demands that the record and discovery be reopened so that the important uncertainties raised by the document can be fully explained. OCRE also notes that the project-wide implications of these management deficiencies, as well as the specific mention of a contractor other than Comstock, make it appropriate to extend the scope of the reopened record to include CEI's control of all contractors at Perry.

Legal Requirements for Reopening the Record

OCRE realizes that certain requirements must be met before the record can be reopened. Three standards must be met affirmatively for the reopening of the record: (1) timeliness of the motion; (2) significance of the matter raised; (3) whether the newly proffered material might cause a different result to be reached. Pacific Gas & Electric (Diablo Canyon Nuclear Power Plant, Units 1 and 2), ALAB-598, 11 NRC 876, 879 (1980). This motion meets those requirements.

^{1/} continued. type of tray, i.e., ventilated or unventilated. There are also limits on the ampacity of the cables dependent on their spacing and on whether the cable tray is ventilated or unventilated.

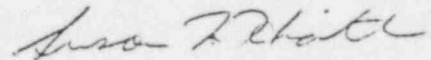
The motion is timely, as OCRE just received the FOIA response, which is dated June 22, 1983. This material could not have been available at the hearing.

That the documents proffered herein address a significant safety matter has been demonstrated above.

OCRE also believes that the attached documents so undermine the credibility of the testimony presented at the hearing that it is likely that a different result would be reached, especially if the Board would insist on the presentation of less biased witnesses. Reopening the record on this ground has been sanctioned by Toledo Edison and Cleveland Electric Illuminating Co. (Davis-Besse Nuclear Power Station, Units 1, 2, and 3, and Perry Nuclear Power Plant, Units 1 and 2), ALAB-430, 6 NRC 457 (1977).

OCRE therefore concludes that, for the reasons above, the record on Issue #3 must be reopened.

Respectfully submitted,



Susan L. Hiatt
OCRE Representative
8275 Munson Rd.
Mentor, OH 44060
(216) 255-3158



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

ATTACHMENT 1

JUN 22 1983

Docket No. 50-440/441

Ms. Susan L. Hiatt
OCRE Representative
8275 Munson Road
Mentor, OH 44060

IN RESPONSE REFER
TO FOIA-83-199

Dear Ms. Hiatt:

This is in response to your letter dated April 15, 1983, in which you requested, pursuant to the Freedom of Information Act, four separate categories of documents which you described in your letter.

The documents listed on Appendix A, which are enclosed, are being released in their entirety. The four documents listed on Appendix B are being withheld in part as explained herein. The segregable nonexempt portions are enclosed with this letter. Portions of these four documents are being withheld pursuant to the exemptions cited in the Appendix.

Information being withheld pursuant to Exemption (6) consists of names and other identifying information on persons, the disclosure of which would constitute a clearly unwarranted invasion of personal privacy. This information is being withheld from public disclosure pursuant to Exemption (6) of the Freedom of Information Act (5 U.S.C. 552(b)(6)) and 10 CFR 9.5(a)(6) of the Commission's regulations.

Information being withheld pursuant to Exemption 7(D) consists of the name of the individual and his personal identifier. Because disclosure of this information would disclose the identity of the confidential source, it is being withheld from public disclosure pursuant to Exemption (7)(D) of the Freedom of Information Act (5 U.S.C. 552(b)(7)(D)) and 10 CFR 9.5(a)(7)(iv) of the Commission's regulations.

Pursuant to 10 CFR 9.9 of the Commission's regulations, it has been determined that the information withheld is exempt from production or disclosure, and that its production or disclosure is contrary to the public interest. The persons responsible for this denial are the undersigned and Mr. Thomas E. Murley, Regional Administrator, Region I.

Ms. Susan L. Hiatt

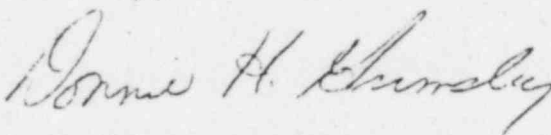
-2-

This denial may be appealed to the Commission's Executive Director for Operations within 30 days from the receipt of this letter. As provided in 10 CFR 9.11, any such appeal must be in writing, addressed to the Executive Director for Operations, U.S. Nuclear Regulatory Commission, Washington, DC 20555 and should clearly state on the envelope and in the letter that it is an "Appeal from an Initial FOIA Decision."

Charges for the enclosed 790 pages total \$11.98. You will be billed directly for this amount by our Division of Accounting.

This completes NRC's action on your request.

Sincerely,


(for) J. M. Felton, Director
Division of Rules and Records
Office of Administration

Enclosures: As stated

APPENDIX A

FOIA REQUEST 83-199

Documents Submitted for Release

1.	2/8/78	Immediate Action Letter Keppler to Davidson	(5 pages)
2.	5/1/78	Letter Davidson to Keppler response to IAL	(15 pages)
3.	8/7/78	Nuclear Quality Assurance Program 0200 - Excerpts	(5 pages)
4.	2/16/79	Management Assessment of QA Program Effectiveness	(8 pages)
5.	8/16/79	Memo Hartline to Walrath - 1980 Internal Audit Schedule	(4 pages)
6.	1/13/80	Memo Leidich to Connelly et al - Unit PAR/ Highlight Performance	(5 pages)
7.	4/23/80	Pullman Power Products-Procedure for Handling Nonconformances (Field)	(26 pages)
8.	1/2/81	Memo Higaki to PQE - Schedule of Project Internal Audit	(8 pages)
9.	3/8/81	Memo QA Advisory Committee to Davidson Minutes of Meeting	(3 pages)
10.	4/6/81	Excerpt fm QA Manual - 0200	(1 page)
11.	6/19/81	Action Request prepared by Brown/Hollenbeck	(4 pages)
12.	8/4/81	Letter Farrell to Barker/Howard - Meeting objectives	(3 pages)
13.	8/6/81	Memo QA Advisory Committee to Davidson Meeting Minutes	(1 page)
14.	10/27/81	Memo J. Hayes to Farrell - 1982 Project Internal Audit Schedule	(9 pages)
15.	11/2/81	Trend Analysis prepared by Brown	(5 pages)
16.	11/9/81	Pullman Power Products - Nonconformance Report	(5 pages)
17.	10/30/81	PNNP - Nonconformance Report Review/ Revision	(5 pages)
18.	12/4/81	Action Request prepared by Brown	(2 pages)
19.	2/23/82	PNNP - Nonconformance Report Review/ Revision	(4 pages)

Documents Submitted for Release

20.	2/25/82	Corrective Action Request 82-06	(2 pages)
21.	2/8/82	PNNP - Nonconformance Report Review/ Revision	(3 pages)
22.	March 82	Task Force Report - QA Program	(12 pages)
23.	March 82	Task Force Report - QA Program, Rev 1	(11 pages)
24.	3/5/82	Action Request prepared by Brown/Bradshaw	(3 pages)
25.	3/5/82	Action Request prepared by Brown/Bradshaw	(2 pages)
26.	3/11/82	Memo Stear to Riley/Martin - Comstock CAR's #82-06 & 82-07	(2 pages)
27.	3/18/82	Memo Farrell to Barkley et al - Corrective Action Plan for Safety-Related 4.16kv Switchgear	(5 pages)
28.	3/19/82	Memo Furness to Tulk - PNPP-SP-557 Class 1E Motor Control Centers	(1 page)
29.	3/30/82	Stop Work Release - Tulk to Merlin	(1 page)
30.	3/30/82	Corrective Action Request 82-09, Rev 1	(10 pages)
31.	4/14/82	Stop Work Release - Tulk to Merlin	(1 page)
32.	4/15/82	Corrective Action Request 82-07, Rev 1	(8 pages)
33.	4/16/82	Letter Mayhew, Schlegel & Gudikunst (Gilbert/ Commonwealth) to Lastovka, CEI	(3 pages)
34.	5/24/82	Letter Stear to Comstock - Electrical Penetration	(1 page)
35.	5/10/82	Engineering Change Notice - Cable Tray Fill	(2 pages)
36.	6/17/82	Memo Leidick to Farrell & Riley-Comstock Status	(12 pages)

Documents Submitted for Release

37.	6/30/82	Addit' Summary	(5 pages)
38.	6/22/82	Letter Ioannidi/Schlegel/Gudinkunst (Gilbert/ Commonwealth) to Bellack, CEI - Flammable Materials in Electrical Equipment	(4 pages)
39.	7/7/82	Letter Frew to Seese - Comstock & Co., Inc Reference concern #3	(2 pages)
40.	7/8/82	Excerpt QA Manual - Line 9 Proposed Disposition	(1 page)
41.	7/8/82	Action Request Revision Sheet - AR 0397, Rev 1	(3 pages)
42.	7/8/82	Action Request prepared by Nicholas-XV Nonconforming Materials, Parts, or Components	(2 pages)
43.	7/8/82	Action Request prepared by Bradshaw - I Organization	(2 pages)
44.	7/13/82	Memo Frew, Comstock & Co re Identification of Concerns as a Result of Unit #1 Electrical Penetration Documentation Review by the LKCE Task Force	(40 pages)
45.	7/27/82	Memo Kilgore to Eichler, Comstock & Co - Review of Equipment Installation Packages	(2 pages)
46.	8/6/82	Letter Eichler, Comstock to Ladochy, Comstock QA HQ, concerns as a result of the review of the equipment installation packages	(4 pages)
47.	8/13/82	Memo Eichler, Comstock re identification of concerns as a result of the electrical equipment documentation review performed by the LKCE Task Force	(6 pages)
48.	8/25/82	Telephone Conversation Record - Riley w/Peschel, RIII	(1 page)
49.	9/2/82	Action Request Revision Sheet - AR 0403, Rev 1	(8 pages)
50.	9/15/82	Excerpts fm QA program 0200	(11 pages)
51.	9/22/82	Letter Davidson to Schwencer-Corporate QA Program	(5 pages)
52.	10/11/82	Packy, Comstock to Bower - Task Force #40	(19 pages)

APPENDIX A (Cont'd) FOIA REQUEST 83-199

Documents Submitted for Release

53.	11/22/82	Pullman Power Products-Excerpt fr QA Manual	(4 pages)
54.	1/19/83	Letter Bower, Comstock to Walter, Pullman Power Products-Electrical Penetration Weld Documentation	(4 pages)
55.	2/3/82	NRC Exit Meeting - Attendance Roster	(1 page)
56.	2/8/83	PNNP Nonconformance Report - Electrical Penetrations	(2 pages)
57.	2/20/83	PNNP Surveillance/Inspection Report-1363	(18 pages)
58.	2/21/83	PNNP -Surveillance/Inspection Report-1393	(3 pages)
59.	2/24/83 -	PNNP Surveillance/Inspection Report-1383	(2 pages)
60.	2/24/83	PNNP Surveillance/Inspection Report-1385	(2 pages)
61.	2/24/83	PNNP Surveillance/Inspection Report-1386	(2 pages)
62.	3/3/83	Letter Cimorelli & Kerr to Bower, Comstock Installation of Electrical Penetrations	(8 pages)
63.	4/4/83	Action Requests - Summary	(32 pages)
64.	4/13/83	List of 50.55(e)'s - Perry Log	(40 pages)
65.	4/15/83	Letter Edelman to Spessard - IE Rpt 83-06	(5 pages)
66.	5/3/83	Open Item List - RIII Tracking System	(2 pages)
67.	5/6/83	Memo Barna to Shuster et al-QA Program Evaluation for 1982	(1 page)

68. Undated	Excerpt from NRC inspection report - used by licensee to track corrective action w/notes of inspector added	1 page
69. Undated	Standard Company Communication - flowchart	3 pages
70. Undated	CEI PNPP Overview	6 pages
71. Undated	Excerpts fm Perry reports to management	1 page
72. Undated	Excerpts fm Perry reports to management	11 pages
73. Undated	Excerpts fm Perry reports to management	15 pages
74. Undated	Corporate Nuclear Quality Assurance Program Appendix I - Evaluation & comparison to other related documents	3 pages
75. Undated	Excerpts from NRC inspection reports - used by licensee to track corrective action	25 pages
76. Undated	Audit Team Inspection - plan	4 pages
77. Undated	Inspection Chronology	9 pages
78. Undated	Requirements & Commitment	3 pages
79. Undated	Action Taken on Task Force-26 Concerns	7 pages
80. Undated	Review of Electrical Penetration Documentation Concerns	16 pages
81. Undated	GE Manual - excerpt of 22A3888, Rev 3	1 page
82. Undated	Pullman Power Products - Visual Inspection Rpts	2 pages
83. Undated	Audit Status Log	6 pages
84. Undated	Surveillance Inspection Report Log	5 pages
85. Undated	Flow Chart - PNPP	1 page

APPENDIX A

Documents Submitted for Release

86. 4/1/83 Meeting Attendance Roster re: NRC Exit (1 page)
87. 4/12/83 Hierarchy of QA Program Documents (1 page)
88. 4/1/83 Memo to R. B. Matthys from C. H. Wright re: Attachment to NR JCI #0012 (2 pages)
89. 3/31/83 Memo to Jerry Smith from S. C. Young re: Review of P.O. and I/F Packages (1 page)
90. 3/25/83 Enclosure 1 re: Procedure Number, Revision, Date and Title (3 pages)
91. 3/1/83 Organization Chart No. 3 - Quality Assurance Organization for PNPP (1 page)
92. 3/10/83 Perry Nuclear Power Plant - Action Request - Initiated by: W. G. Morris and K. J. Cimorelli (2 pages)
93. 1/11/83 Perry Project Organization (1 page)
94. 2/22/83 Inspection of Items in Storage (1 page)
95. 5/4/81 Perry Nuclear Power Plant - Nonconformance Report Review/Revision (1 page)
96. 5/15/81 Letter to Jim Jones from R. J. Zimmer re: Code Edition Change - P.O.'s 64491 and 64492 (1 page)
97. Undated Draft Report re: Qualification and Certification of Quality Control Personnel (3 pages)
98. 10/31/81 Qualification and Certification of Quality Control Personnel (18 pages)
99. 8/15/80 Housekeeping and Storage of Items and Materials (16 pages)
100. 12/17/80 Applicable Codes and Standards (1 page)
101. Undated PNPP Organization Chart (1 page)
102. 10/22/82 Construction Quality Section and Construction Quality Auditing Organization Chart (1 page)
103. 4/18/83 Letter to Steve Young from R. B. Matthys re: Storage Maintenance of Site Supplied Small Bore Valves (1 page)

APPENDIX A

Documents Submitted for Release

- 104. Undated Receiving Inspection (1 page)
- 105. Undated Purchase Order Deficiency List (6 pages)
- 106. 2/18/82 Letter to James G. Keppler from Dalwyn R. Davidson re: Inspection of Work being Performed by the L. K. Comstock Corporation at the Perry Plant Construction Site (2 pages)
- 107. 5/5/82 Letter to James G. Keppler from Dalwyn R. Davison re: Actions of The Cleveland Electric Illuminating Company (3 pages)
- 108. 10/27/83 Letter to James G. Keppler from Dalwyn R. Davidson re: Response to Enforcement Item (17 pages)
- 109. 11/10/82 Letter to James G. Keppler from Dalwyn R. Davidson re: Responding to I.E. Report 50-440/81-19; 50-441/81-19 (2 pages)
- 110. 1/21/83 Letter to James G. Keppler from Murry R. Edelman re: Responding to I.E. Report 50-440/81-19; 50-441/81-19 (2 pages)
- 111. 2/14/83 Letter to Murray R. Edelman from C. E. Norelius re: Steps Taken to Correct Noncompliances 50-441/81-19-03 and 50-441/81- (1 page)
- 112. 1981 Board Notification Index (6 pages)
- 113. 2/18/83 Memo for Chairman Palladino et. al. from Darrell G. Eisenhut r Board Notification 83-17 Allegations Relative to Unresolved Safety Issue A-17 (39 pages)
- * 114. 4/20/83 Memo for Richard W. Krimm from Edward L. Jordan re: Working Group to Reevaluate NUREG-0654, FEMA-REP-1, Rev. 1 (2 pages)
- 115. 3/23/83 Source Term Development - Post WASH-1400 (22 pages)
- 116. 12/31/82 Division of Licensing Board Notification Tracking System (11 p

*Item 1 & 2 documents - 56 pages @ \$0.05 per page = \$2.80
 **Item 3 & 4 documents - 75% fees waived - 734 pages = \$9.18

APPENDIX BExemption

- | | | | | |
|----|------------------|---|---|------|
| 1. | October 18, 1978 | - | Written Proficiency Test Questions (2 pages) | 6 |
| 2. | October 24, 1978 | - | Written Proficiency Test Questions (2 pages) | 6 |
| 3. | April 24, 1981 | - | Certificate of Qualification (1 page) | 6 |
| 4. | Undated | - | Handwritten Note to Dee Hayes from Jim Kinklin,
Subject: "CEI Control of Newport News."
(2 pages) | 7(D) |

ENGINEERING CHANGE NOTICE
PERRY NUCLEAR POWER PLANT

2
☒ SP ECH ☐ DWG. E

(A) SUBJECT Cable Tray Fill
ORIGINATOR J. H. Hef 5-10-82
DEPARTMENT K & H Engineering - Electrical

(E) ECH NUMBER 8701-33-1932 EV. --

AFFECTS SP- 22-1549-00

(B) DETAILS AND BACKGROUND OF REQ'D. DESIGN CHANGE:

The purpose of this ECH is to clarify SP-33 requirements when cable fill reaches the top of the side.

FOR INFORMATION
ONLY

REASON FOR CHANGE:

- ☐ UNSATISFACTORY TEST RESULTS
☐ INTERFACE PROBLEMS DURING CONSTRUCTION
☐ FAILURE TO MEET FUNCTIONAL REQUIREMENTS
☐ DISPOSITION OF NON-CONFORMING ITEM
☐ CHANGES IN REGULATORY OR OTHER REQUIREMENTS
☐ OPERATIONAL EXPERIENCE
☒ DESIGN IMPROVEMENTS
☐ OTHER _____

ATTACHMENTS #1

Revise SP-33 Item 5:08.13 sub-item 6.

(C) INTERFACING DEPARTMENTS
ORGANIZATIONS OR GROUPS

- ☐ CIVIL _____ ☐ STRUCTURAL _____
☐ ELECTRICAL _____ ☒ QUALITY ASSURANCE (SEE (H))
☐ BLDG. SERVICE _____ ☐ HSSS _____
☐ I & C _____ ☐ OTHER _____
☐ MECH. /NUCLEAR _____

(D) PROJECT ENGINEER APPROVAL

BY: J. H. Hef TIA. SCHLEGEL DATE: 5.10.82
PROJECT ENGINEER

(F) DOCUMENTS TO BE REVISED
BY THIS ECH

SP-33-4549-00 REV. III

SAR CHANGE REQ'D? ☒ NO ☐ YES

(F₁) SYSTEM AFFECTED
N/A

(F₂) MATERIAL TO BE PURCHASED
☒ NO ☐ YES

(G) DESIGN REVIEWER APPROVAL

BY: J. H. Hef DATE: 5.10.82
DESIGN REVIEWER

(H) QA APPROVAL (IF REQ'D)

BY: T. J. Thompson DATE: 6-12-82
QA MANAGEMENT

(I) PROJECT MANAGEMENT APPROVAL

BY: _____ DATE: _____
PROJECT MANAGEMENT

(J) CEI ACCEPTANCE

BY: _____ DATE: _____
RESPONSIBLE SENIOR ENGINEER

Q/A REVIEW REQUIRED ☒ NOT REQUIRED ☐

REVIEWED BY: See "H" DATE: _____
Q.A. REPRESENTATIVE

BILL OF MATERIAL NUMBER(S) ISSUED

SPEC. NO. _____ AND CONT. /PO NO. P- _____

(K) DESIGN CHANGE INCORPORATED

BY: _____ DATE: _____
PROJECT ENGINEER

ECN # 8701-33-1932
Attachment #1
Spec. No. SP-33-4549-00

5:08.13 Subitem 6.

Low voltage power, control and instrument cables shall be installed in tray without maintained spacing. The cables shall be placed in the trays so that they are straight and lie flat with a minimum of crossovers, except as specified in Item 5.:08.17.1 subitems h through k. The cable fill may exceed the top of the tray side rail due to field installation conditions. When the cable fill reaches within 1/2" below the top of the side rail, the contractor shall inform the PROJECT ORGANIZATION of locations where cable fill will exceed and/or is within the prescribed 1/2" criteria via the Q/C inspection report or comparable document.

**FOR INFORMATION
ONLY**



L.K. Comstock Engineering Company, Inc.

A COMSTOCK GROUP COMPANY

Equipment
Perry Nuclear Power Plant

ATTACHMENT 3

August 6, 1982

William G. Ladochy
Eastern Regional Manager, QA/QC Services
L. K. Comstock Engineering Co., Inc.
920 Fort Duquesne Blvd.
Pittsburgh, PA 15222

Subject: Concerns as a Result of the
Review of the Equipment
Installation Packages

Bill,

The following are major concerns as a result of a partial review of
Equipment Installation Packages performed by the Task Force.

- Concern 1A. L. K. Comstock Inspectors have been performing and signing
for acceptance of inspections outside of their areas of cert-
ification. As a result of these findings all personnel and
inspections performed prior to January 1, 1982, must be held
in suspect.
- This is to include Switchgear, Termination Cabinets, Rotating
Equipment and Penetrations #1R72-S001 thru 1R72-S029. A par-
tial list of examples is as follows:
- a. Brian Palmer has made inspections on the Class 1E Switch-
gear and Termination Cabinet Installation Checklist (Form
#32). He was never certified to perform Equipment Instal-
lation Inspections. Example: 1H13-P706, P710, P711, P712
P713, P714, and P715.
 - b. G. Young has verified inspections on the Class 1E Switch-
gear and Termination Cabinet Installation Checklist (Form
#32) before his certification date of 4-7-81. Material
Receiving Report indicate verification of Material Receive
before he was employed. Example: 1H13-P706, P707, P710,
P711, P712, P713, P714, and P715.
 - c. G. Hagler has not been certified to perform Equipment Insa-
lation but has performed inspections and documented such o
Form #32. Example: 1H13-P710, P711, P712, P713, and P714
 - d. L. Samosky has documented stud welding on Form #100 but ha
never been certified to Stud Welding. Example: 1H13-P706
P710, P711, P712, and P713.



Concern 1A. e Continued

2/14/80. There is no co-signature.
Example: 1H13-P707, and P715.

- f. H. Hanson was only a Level I and has signed Inspection Report (Form #118) without a Level II co-signature.
Example: 1H13-P711, P712, P713, and P715.
- g. Phil Romano inspected Class 1E Switchgear on 2/11/81 (Form #118). He was not certified until 4/13/81 and only as a Level I.
Example: Package OR24-S023.
- h. Lucille Cleary received material since 8/13/80 (Form #39A). She was not certified until 2/23/81 and then as a Level I.
Example: Package 1H22-P030.
- i. Brian Palmer signed off Form #32 Class 1E Switchgear and Termination Cabinet Installation Checklist on 1/8/80. He was not certified for Equipment Installation. Clarence Hart co-signed this form. Additional examples available.
- j. R. L. Coffman co-signed Inspection Report #356 for Phil Romano who was not certified on 2/11/81. He was not certified himself until 4/7/81.

D. Approximately six (6) people were certified out of 22 people who were signing off various Inspection functions and were not certified to do so at that particular time.

This partial list of uncertified individuals was taken from the personnel files and based on the information available. The necessary Site approval letter for certification was not noted in most individual personnel files at the time of review for specific activity certification.

- 1B. The 1R24 packages are in the process of being turned over to Site. They were reviewed for Validity of Inspections prior to transmittal to the Task Force. The results of this review also indicated inspections performed by individuals not certified to specific activities. The documentation in question consists of Nonconformance Reports, Inspection Reports, Material Receiving Reports and Checklists for documenting electrical equipment installation.
- 1C. In reference to electrical penetrations, 1R72-S001 - S029, all inspections performed and documented on form #39A, Material Receiving Reports, and Form #116-A & B, Installation Checklists have been generated by inspectors who were not certified on the date the inspections were performed.



Concern

- 2A. There appears to be no standardized method to filling out Form #21, Insulation Resistance/Continuity Test Report. The forms have been altered by the craft to suit their own interpretation. Often, the results are indecipherable.

SP 709-4549-00 Section 1:05.10 Control of Inspections and Tests
Paragraph 1 states:

1. A program of inspections and tests shall be prepared for all activities affecting quality, and shall identify those inspection and tests points to be verified for conformance to documents such as instructions, procedures, drawings, specifications, etc., that are used to perform the activity. The inspection and tests shall be performed by individuals other than those who performed the activity being inspected or tested and who do not report to the supervisor who directed the original WORK. There shall be an adequate number of inspections and tests performed to assure that all operations of the activity fulfill the predetermined quality requirements. The CONTRACTOR shall describe the system which he will utilize to identify, implement and verify HOLD POINTS, or WITNESS POINTS which will assure that inspections and tests are performed as required.

Paragraph 1:05.10 3.C states:

3. c. What written instruction the person performing the inspections and tests will be working to, including the specific acceptance criteria, tolerances, etc., which must be verified.

- 2B. Craft has been using the infinity symbol (∞) extensively. The Procedure states that the reading should be in ohms, megohms, etc. Procedure 4.3.18, Meggering and Continuity Testing, paragraph 3.1.9 states: "A record shall be made and kept for all tests governed by this procedure. The record must indicate the following: (Use Form #21, Attached)"

3.1.9 states: "Test Measurements obtained, with units identified (i.e. ohms, megohms, etc.)."

3.2.1, under acceptance criteria states:

"Unless otherwise specified by the Project Organization Engineer, values in Figure 15 (Page 12) shall be used."

It is a requirement of Spec 33-4549-00 that 100% of all Class 1E and Non Class 1E cables have a Megger/Continuity Test and the results be documented. This activity is performed solely by the construction department. (Testing and Documenting). The Quality Control Dept. has accepted these test results in accordance with procedure 4.3.18 prior to this procedure being approved.



Installations and as a result of these findings, all inspections performed prior to 1/1/82 should be considered invalid and the lack of certification of individuals performing these inspections should be addressed immediately. Add all Megger/Continuity Tests should also be considered invalid, as a result of acceptance of test results without an approved procedure.

Also, all inspections presently being performed and all personnel certified should be reviewed at this time because of the fact that some of the inspectors as being not certified in specific activities are currently employed by L. N. C. at the Perry Site.

Cordially,

V. A. Eichler
Leader, Task Force

cc: R. E. Marino
L. G. Seese
D. Friend
R. L. Bower
J. Zilka, ECI

PERRY

1. The QAAC which was formed as a result of the 1978 problems was not functioning (e.g., meeting frequency) as required by the QA program as late as 1982. The licensee changed the QA program relating to the QAAC to be less restrictive. Even when the QAAC met, it was not doing meaningful reviews.
2. The format of the periodic report on various QA-identified deficiencies from the CEI QA Manager to the VP Construction was changed in 1982. The change resulted in a loss of ability to tell from the report the status and disposition of pre-format change deficiencies. Consequently, the report did not serve its intended purpose of keeping top management abreast of QA deficiencies.
3. Findings of CEI audit of Pullman and Comstock were not being processed in a timely manner. Delays were identified both in getting contractor responses to the audit findings and in contractor implementation of corrective actions. Some findings were not resolved for 2 years.
4. Audits, surveillances, and NRs by Comstock of the Comstock organization were not being processed in a timely manner. Delays were identified both in getting responses to the findings and in implementation of corrective actions.
5. CEI has not done any significant trending of findings of CEI audits of contractors since 1980.
6. Pullman does not do trending of findings of Pullman audits, surveillances, and NRs.
7. Pullman verifies completion of NR corrective actions without doing field checks.

Perry

Regulatory Reqs. &/or Licensee Commitments (for attached concerns)

1. The QAAC

Regulatory Requt.: 10CFR Part 50 Appendix B Crit.
"The applicant shall regularly review the status
adequacy of the Quality Assurance Program."

Licensee Commitment: Nuclear Quality Assurance
Section 0700
~~Section 0700~~ "Quality Assurance
PP 1.4 Management Assess.
[I have a copy of each revision
in that paragraph.]

2. Management reporting

Requirement: ANSI N 45.2
Grey Book Series Wash 1283 Rev. 1: ex
on mgt. reporting in Section D as
regulatory guide.

Licensee Commitment: Numerous policy
(in house)

3. Auditing

Regulatory Requt: Appdx B Criterion XVII

Licensee Commitment: QAM & FAP
(Project Administration)

4. NR's.

Request: Appx B Criterion IV

Licensee QAM & PAP section 15

5. Trending

Only Commitments of Licensee:

Documented in IAL Feb. 8, 1978 (TP 7)
& Licensee in response in letter May 1, 1978
confirmed the NR control.

6. Pullman probably is not required to, I didn't complete
my review of their program.

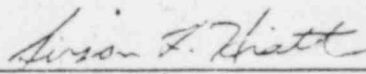
7. Re Inspect NR completion

Request: ANSI N 45.2

Licensee: QAM & PAP's Section 15

CERTIFICATE OF SERVICE

This is to certify that copies of the foregoing MOTION TO REOPEN THE RECORD ON ISSUE #3 were served by deposit in the U.S. Mail, first class, postage prepaid, this 13th day of July 1983 to those on the service list below.


Susan L. Hiatt



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