

AFFIDAVIT OF GARY R. LEIDICH

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)	
)	
THE CLEVELAND ELECTRIC)	Docket Nos. 50-440
ILLUMINATING COMPANY, <u>et al.</u>)	50-441
)	
(Perry Nuclear Power Plant,)	
Units 1 and 2))	

AFFIDAVIT OF GARY R. LEIDICH

County of Lake)
) ss:
State of Ohio)

Gary R. Leidich, being duly sworn, deposes and says as follows:

1. I, Gary R. Leidich, am Senior Engineer, Nuclear Construction and Engineering Section, The Cleveland Electric Illuminating Company. My business address is 10 Center Road, Perry, Ohio 44081. My professional qualifications and experience are set forth in Applicants' Testimony (Edelman/Leidich Testimony), following Tr. 1031, at 3-5. I have personal knowledge of the matters set forth herein and believe them to be true and correct.

2. I have reviewed the Board's Memorandum and Order (Motion to Reopen), dated August 18, 1983 (Memorandum and Order), and am

addressing in this Affidavit concerns identified by the Board at pages 3-8 of the Memorandum and Order. The Board's concerns relate to findings discussed in a Comstock task force letter, dated August 6, 1982, which was attached to the July 13, 1983 Motion to Reopen the Record on Issue #3, filed by Ohio Citizens for Responsible Energy (OCRE). The letter cited by OCRE discussed preliminary task force findings that showed instances in which inspectors had completed inspection documents in areas outside the inspectors' certifications. I discussed the task force findings, and responsive actions thereto, in an Affidavit dated August 4, 1983 (August 4 Affidavit), attached to Applicants' Answer to OCRE Motion to Reopen the Record on Issue #3, dated August 4, 1983. The Board has requested supplementary information concerning the certification issue. The following information is provided in response to the Board's questions.

3. The requirements for qualification and certification of Comstock inspectors are contained in the PNPP quality assurance attachment specification (SP-709) to the PNPP electrical installation specification (SP-33). SP-709 incorporates by reference American National Standards Institute (ANSI) N45.2.6-1973, entitled "Qualification of Inspection, Examination and Test Personnel for the Construction Phase of Nuclear Power Plants." ANSI N45.2.6 sets forth guidelines for the qualification and certification of inspectors, based on factors such as education, training and experience. The standard indicates that in considering these factors,

employers may also take into account other factors such as satisfactory completion of proficiency testing. ANSI N45.2.6 provides for three certification levels. Level I inspectors may only perform inspections and are not permitted to evaluate, approve, or accept inspection results. Level II inspectors are permitted to inspect as well as evaluate, approve and accept inspection results. Level III inspectors have the same authority as Level II inspectors and may, in addition, approve and accept inspection procedures.

4. Consistent with SP-709 and ANSI N45.2.6, Comstock developed a certification program for its inspection personnel prior to initiation of safety-related electrical work. Project Organization QA personnel reviewed Comstock's program prior to its implementation, to assure compliance with SP-709 and ANSI N45.2.6. Under Comstock's program, inspectors are certified to task-specific areas. (The level designations discussed above apply to each task area). At the time of the task force review, Comstock's inspectors were certified as level I, II or III inspectors in one or more of the following areas: receipt, equipment, installation, calibration, tray/conduit (raceway) installation, cable pulling, electrical terminations, hilti bolt installation, core drilling, civil, visual welding, stud welding, liquid penetrant testing, and magnetic particle testing. In order to be certified in a particular task area, inspectors must first be proficient in the procedures applicable to that area.

5. In accordance with SP-709, since the beginning of Comstock's program Project Organization QA personnel have reviewed all Comstock certifications. Inspectors have not been permitted to begin work at a new certification level, or in a new task area, without Project Organization approval. On several occasions, the Project Organization has withheld certification approval when our evaluation determined that qualifications were not satisfactory.

6. In addition to these reviews, CEI and Comstock have overviewed Comstock's implementation of its certification program through periodic audits and field surveillance. CEI's field surveillance resulted, on at least two occasions, in the decertification of Comstock inspectors, when it was determined that they were not satisfactorily carrying out their inspection responsibilities.^{1/} In addition, seven CEI audits between 1978 and 1982 identified isolated instances of certification discrepancies similar to those found by the task force. However, neither the audits, nor the final task force findings, identified a serious problem with certifications. As discussed below, the certification discrepancies identified by the task force were insignificant in number and kind, and involved no safety deficiencies. The task force findings thus confirmed the adequacy of Comstock's and CEI's QA/QC program with respect to certifications. This

^{1/} The work inspected by these decertified inspectors was fully evaluated and, where necessary, reinspections were performed.

explains why we did not emphasize certification issues during our testimony. See Memorandum and Order at 4-5.2/

7. In March 1982, at the direction of CEI's lead electrical quality engineer, Comstock conducted Audit CQA-27, which was a comprehensive internal audit of Comstock's QA program. I made reference to this audit at the hearing. See Tr. 1534. Among other things, the audit observed a small number of random certification discrepancies, and raised questions concerning the completeness of inspection documentation. CQA-27 concluded that further assessment of QA records and procedures was required. CEI reviewed the results of the audit. Comstock's principal corrective action in response to this finding was to establish a task force under the direction of Comstock's Corporate QA Manager. This was the task force referenced in the August 6, 1982 letter attached to OCRE's July 31, 1983 Motion. The task force had a broad charter to perform a comprehensive review of Comstock QA documentation completed as of the time of the task force review.^{3/}

8. The task force performed its review from April-December, 1982. Its findings were set forth in a series of internal letters and memoranda issued on a periodic basis during that period. The

^{2/} The certification discrepancies discussed herein are unrelated to CEI's testimony concerning Comstock's periodic difficulties in obtaining appropriate numbers of inspection personnel. See Memorandum and Order at 4, 7.

^{3/} Inspector certification was one of many QA/QC areas reviewed by the task force and covered in their findings.

documentation review was divided into six construction areas: civil, hangers, penetrations, equipment, circuits (including terminations), and raceway. The task force consisted of four individuals from the Comstock QA organization, and three independent QA consultants retained by Comstock. The seven task force members worked on the review on a full time basis until the review was completed in December 1982. The task force review covered approximately 5,900 documentation packages containing approximately 30,000 records. See NRC Inspection Report No. 50-440/83-06; 50-441/83-06, dated March 16, 1983 (83-06 Report; Board Exhibit 4, ff. Tr. 1619), at 2-3.

9. At the time the task force was formed, Comstock informed CEI of the nature and broad scope of the effort to be accomplished. CEI viewed the task force as an aggressive corrective action by Comstock in response to documentation findings from the NRC's 1981-82 investigation and Comstock's CQA-27 Audit. CEI was aware that the task force was documenting its findings, and, consistent with CEI's QA program, CEI's review of the task force findings was to take place on completion of the task force review. Meanwhile, CEI was closely overseeing Comstock's performance throughout 1982. See, e.g., Tr. 1534-41 (Leidich).

10. CEI issued a CAR (#82-21) in August, 1982 identifying, among other things, some of the same certification discrepancies as those identified by the task force. Among other things, CAR 82-21 identified an absence of level II co-signatures on

inspection documents (one of the certification findings discussed in the August 6, 1982 task force letter). As I testified in response to questions about CAR 82-21 from Mr. Abramson and the Board, one of the corrective actions in response to the CAR was that "all of the inspectors were notified by their supervision -- and this is one of the particular findings -- level II inspectors must review all inspection-related documents." Tr. 1338. See ¶15. For the Board's information, I am attaching a copy of CAR 82-21.

11. In response to CAR 82-21, Comstock reemphasized to CEI that Comstock's task force would fully document and evaluate all certification discrepancies (the CAR at page 2 makes explicit reference to the task force), and would take the necessary corrective action, including reinspection of hardware where required. I discussed the corrective action plan to CAR 82-21 at Tr. 1336. Because the task force review was still in process when the CAR was issued, and since the reviews conducted up to that time had not revealed hardware problems, CEI did not direct Comstock to file a Nonconformance Report. However, CEI did agree with the NRC that corrective action documents should have been written by Comstock to track task force items as of February 1983, by which time Comstock had reviewed the final findings of the task force. For this reason, we did not contest the 83-06 Notice of Violation (Board Exhibit 4, ff. Tr. 1619). See August 4 Affidavit, ¶9; Tr. 1611-19. A copy of CEI's formal response to the 83-06 Notice of Violation is attached.

12. As indicated in CEI's response to Inspection Report No. 83-06, Comstock's findings had been documented on documentation package checklists. In addition to Comstock's recording the documented findings on NRs, CEI placed the task force findings on Project Organization Surveillance Inspection Reports (SIRs) to ensure proper resolution of the findings. CEI also placed a Project Organization QA representative in Comstock's organization on a full time basis to perform continuous monitoring of Comstock inspection reports and documentation packages, including those affected by the task force findings. I discussed this individual's QA role at Tr. 1541-42, 1556-57.

13. The final certification findings identified by the task force involved equipment (cable reels, control room panels, motor control centers, switchgear, and termination cabinets) and penetrations.^{4/} The final task force findings, covering certification and other areas, were formally transmitted to CEI on February 12, 1983.^{5/}

^{4/} The reference in the August 6 letter to megger/continuity tests, included in the Board's citation at page 5 of the Memorandum and Order, did not involve certification discrepancies -- this is evident from the discussion under items 2A and 2B of the letter.

^{5/} Project Organization QA personnel discussed task force findings (including certifications and other issues) with Comstock personnel on a periodic basis between April 1982 and February 1983.

14. The task force review covered the majority of Comstock's inspection records from 1978-1982. I would emphasize that the task force review was conducted in advance of the final turnover document reviews conducted by both Comstock and Project Organization. See Tr. 1540-41. These reviews would have detected discrepancies of the type identified by the task force. The final certification finding involved only 190 out of the approximately 30,000 records reviewed by the task force, and 15 out of approximately 110 inspectors employed by Comstock during the 1978-1982 time period.^{6/} As explained below, the task force found only a limited number of instances in which the 15 inspectors had conducted inspections that were not in strict accordance with certification requirements. The vast majority of the inspections performed by these 15 inspectors were properly within their certifications.

15. Of the 190 affected inspection records, approximately 35 of the records indicated failures to document level II inspector acceptance of inspection results (i.e., missing level II co-signatures). This problem, including some of the same specific cases cited in the August 6, 1982 task force letter, had been

^{6/} The August 6, 1982 task force letter stated that "Approximately six (6) people were certified out of 22 people who were signing off various Inspection documents and were not certified to do so at that particular time." The finding was based on only a partial record review. Based on subsequent review, the task force concluded that the certification discrepancies involved 15 inspectors.

identified by CEI in conjunction with CEI's audit leading to the issuance of CAR 82-21, dated August 31, 1982. See ¶¶10-11.

16. The remaining certification discrepancies covered by the task force finding involved instances of inspectors completing checklist items for tasks outside the inspectors' task certifications. However, in these cases, the inspection personnel were performing inspections that were common to two or more certification area checklists. The technical knowledge for these common inspections was the same or similar, even though they were in different task-specific areas. For example, inspectors certified to inspect torquing operations for raceway bolts inspected torquing operations for penetration bolts. The knowledge and proficiency required to perform these two inspections was the same. Because inspectors were completing these common inspections on checklists for areas in which they were not certified, certification discrepancies were noted by the task force. CAR 83-02, identified at ¶10 of the August 4 Affidavit, was CEI's formal response to this finding. I referred to this CAR at Tr. 1541. For the Board's information, a copy of CAR 83-02 is attached. In response to the CAR, Comstock has discontinued the practice of inspectors signing common checklist items outside their certifications. Despite Comstock's and CEI's confidence in the proficiency of the inspectors involved in the task force finding, engineering reviews were conducted, and reinspections were performed. As indicated below, the reinspections did not uncover safety deficiencies.

17. As indicated in the August 4 Affidavit, ¶10, Comstock issued Nonconformance Reports LKC 1795 and LKC 1797 to document all Comstock inspector certification discrepancies covered by the task force finding. The NRs describe certification discrepancies covering, in total, 248 pieces of equipment, and 35 penetrations. The NRs were reviewed by both Comstock and Project Organization engineering and QA personnel. Based on the reviews, Comstock and CEI jointly concluded that reinspections should be conducted with respect to 239 out of the 248 pieces of equipment, and six out of the 35 penetrations.

18. The engineering reviews concluded that the remaining items, including 29 penetrations and nine pieces of equipment, did not require reinspection. The 29 penetrations, which were installed and not readily accessible to reinspection, were thoroughly evaluated by Comstock and Project Organization engineers. These reviews indicated that the certification discrepancies involved common checklist items for uncomplicated types of inspections such as torquing, cleanliness, and cosmetic damage. It was determined that the inspectors who signed these items were proficient in the inspection procedures involved. See ¶16. For this reason, and based on Comstock's and Project Organization's reviews of the types of inspections involved, it was concluded that reinspection of the penetrations was not required. Although reinspections are not being performed, final acceptance testing of the penetrations will be performed to provide additional assurance of the adequacy of the penetrations. The remaining nine equipment discrepancies involved various examples of items not requiring

reinspections, e.g., items which had previously received engineering review and acceptance subsequent to inspections, and items for which inspections were never required.

19. The reinspection program has been completed with the exception of two penetrations. These two penetrations are currently disassembled and will be reinspected after reassembly. These reinspections, which are uncomplicated, involve the alignment of holes prior to bolting. We expect the reinspections to take less than four hours.

20. The reinspections, 7/ which met or exceeded the original inspection requirements, have included visual inspection for cleanliness and storage, adequate protection for cable reels, torquing, location, and alignment. All reinspections have been accomplished without difficulty in obtaining access to previously inspected items. Although several cases involving minor cosmetic damage (e.g., scratches, chipped paint) were identified due to ambient construction activity, no hardware deficiencies or safety problems were identified.

21. To accomplish the reinspections, Comstock used two level II inspectors working for four months, and one level II and one level III inspector working for one month. Throughout the reinspection effort, Project Organization QA personnel have closely monitored Comstock's QC staffing levels to assure that the reinspection effort has not reduced Comstock's ability to maintain

7/ All discrepancies involving in-process inspection were covered by the reinspection program. See Memorandum and Order at 8.

effective first line inspection of current construction activities. In addition to CEI's surveillance and inspection. Comstock has submitted a biweekly report to CEI quantifying the status of all their outstanding inspections, including those covered under the reinspection program.

22. Pursuant to DAR #118, dated February 28, 1983 (see August 4 Affidavit, ¶10), Project Organization engineering and QA personnel reviewed the final task force certification findings in their entirety, as well as the QA/QC and engineering reviews and reinspection program discussed above. Based on the extremely low percentage of certification discrepancies (i.e., discrepancies on only 190 out of 30,000 inspection records), the type of certification discrepancies identified, and the adequacy, status, and preliminary findings of the reinspection program, CEI concluded that the certification discrepancies did not raise safety issues. Thus, CEI concluded that the certification discrepancies were not reportable, and the DAR was closed on March 2, 1983.

23. In sum, the task force certification review and CEI's and Comstock's responses to the task force review have confirmed the adequacy of Comstock's and CEI's QA/QC programs with respect to certifications. The task force was an aggressive corrective action by Comstock involving a massive documentation search. The reinspection program was equally thorough. The task force findings involved no serious certification discrepancies, either in terms of numbers or types of discrepancies, and no safety problems were identified by Comstock or CEI during the reinspection program. Although Comstock did not draft formal QA/QC documents

until February 1983, Comstock was nonetheless documenting all discrepancies found during the task force review. CEI was aware of the task force review, was monitoring the review consistent with its QA/QC program, and was independently performing QA/QC reviews of areas covered by the task force. CEI has reviewed all instances of certification discrepancies and has found nothing to suggest that the discrepancies were attributable to "wrongdoing." See Memorandum and Order at 7. CEI's overview of Comstock has independently verified the adequacy of Comstock's certifications and the safety of the plant.

Gary R. Leidich
Gary R. Leidich

Subscribed and sworn to before me
this 19th day of September, 1983.

James R. Lunsford

NOTARY PUBLIC

My Commission Expires:

11-12-83

RECEIVED

RECEIVED

8.16.1

SEP 1982

Perry Nuclear Power Plant SEP 21 1982

ACTION REQUEST

AR 0001

NO. 82-21
TRAIN ADMIN. QUALITY

CORRECTIVE ACTION REQUEST

File No. 30170311

LKC Audit Number 74 AAO 09/07/82

Appendix B
Criteria No. 17

Responsible Organization L.K.C. 033

Initiated By: A. Alonso/D. Bruyer Initials AAO/DAB Issue Date 08/31/82

Governing Requirement: SP-709-4549-00; 1.05.17; 1.05.2; LKComstock Procedure 4.1.4

- Observation:
- (1) Inspection reports are signed by unqualified personnel.
 - (2) Inspection reports are incomplete and without the required QC signatures.
 - (3) No program exists for qualifying inspectors in Insulation Resistance and Continuity Testing. Inspection reports are being signed by inspectors with inconsistent qualifications.
 - (4) Of the packages examined, a 54% rejection was observed.

RECEIVED
JAN 25 1983

Potentially Reportable Per 10CFR21 or 50.55 e ☐ Yes ☒ No

DAR No. PNPP QRF

Upgraded to CAR ☒ Yes ☐ No

Reviewed for Significance By: MR Lerdich

Recommendation: (1) LKC shall train all inspectors on the importance of the inspector signature on a report, what the significance of that signature is, and the importance of completely filling out reports. (2) LKC shall implement a program for qualifying inspectors in IR&C testing. (3) LKC shall immediately implement a program to correct existing deficiencies in inspection documentation. (CONTINUED - SEE ATTACHED)

Response Due Date 09/02/82 09/03/82

Cause: Inadequate written training.

Acknowledged By: [Signature] 9/3/82

INFORMATION ONLY

Response (include corrective action and steps to prevent recurrence) LKCE/QC has undergone a massive retrain program concerning all areas of documentation. In order to satisfy this C.A.R. the following items should be considered. (1) Inspectors were notified in writing (See attachment 1) that a responsible Level II must review all inspection related documents. (2) All Inspectors in the area of cable pull, terminations, and equipment installation were tested to assure working knowledge (See attachment 2) of continuity and meggering. Test scores range from 90% to 100%. LKC Procedure 4.3.18 will be revised to include a statement reflecting the fact that cable pull, termination and equipment installation Inspectors will be trained to these requirements. All future Inspectors certified in these areas will be tested to assure

Continued on page 3 of 7.

Completion Date 01/03/83

Response Prepared By: Larry G. Seese / R.L. Bower

Response Date 09/14/82

Response Evaluation: RESPONSE IS ADEQUATE AND ACCEPTED. LKC HAD TAKEN IMMEDIATELY ACTIONS AFTER THIS CAR WAS ISSUED IN ORDER TO CORRECT THE ABOVE MENTIONED FINDINGS.

Evaluation: ☒ Accept ☐ Reject

CAUSE CODE 02

Evaluation By: J. Funn / E. B. 9/24/82

Evaluation Date: 09/16/82

Verified By: J. Funn / E. B.

Verification Date: 01/20/83

Remarks: The Above Response HAS BEEN ACCEPTED AND REVIEWED

AR 0001

LKC 033

LKC Audit #~~726~~ ^{743 AAD} 07/07/82

RECOMMENDATION (continued)

Some of these problems have been identified by the Records Task Force.

The response to this CAR shall include the corrective action plan in response to items identified by this audit and by the Task Force.

FOR INFORMATION ONLY

PAGE 3

C.A.R. 82-21

RESPONSE: " CONTINUED "

knowledge in this subject. (3) All past documents are being reviewed for technical adequacy and required corrections or updates are being performed. (4) A memo has been issued to all Inspectors (See Attachment 3) covering timely responses of Inspection documents.

INFORMATION ONLY



L. K. COMSTOCK & COMPANY, INC.

Memorandum

Attachment 1

To: ALL Q.C. LEAD INSP.
From: LARRY G. Seese
Subject: TRAINING AND DOCUMENTATION

cc All Inspectors
D.S.S.K
File

Office Perry-QC

Date 8-2-82

(1) Effective this date All New or Revised LKC Procedures will be issued to the Inspector via LKC Document Control on Form 52. The Form 52's with the Procedures Attached will be delivered to me. They will not be issued to the Inspectors until they attend all required training classes.

(2) I have received complaints about Level I signatures appearing alone on documents. All documents signed by a Level I must have a Level II Review before the form is turned in. This includes NR's, AFR's, IR's, check sheets and all other documents. No documents should be turned into the QC Secretary or QC Records without a Level II signature.

KEY

NAME James Sumrow

DATE 7/7/52

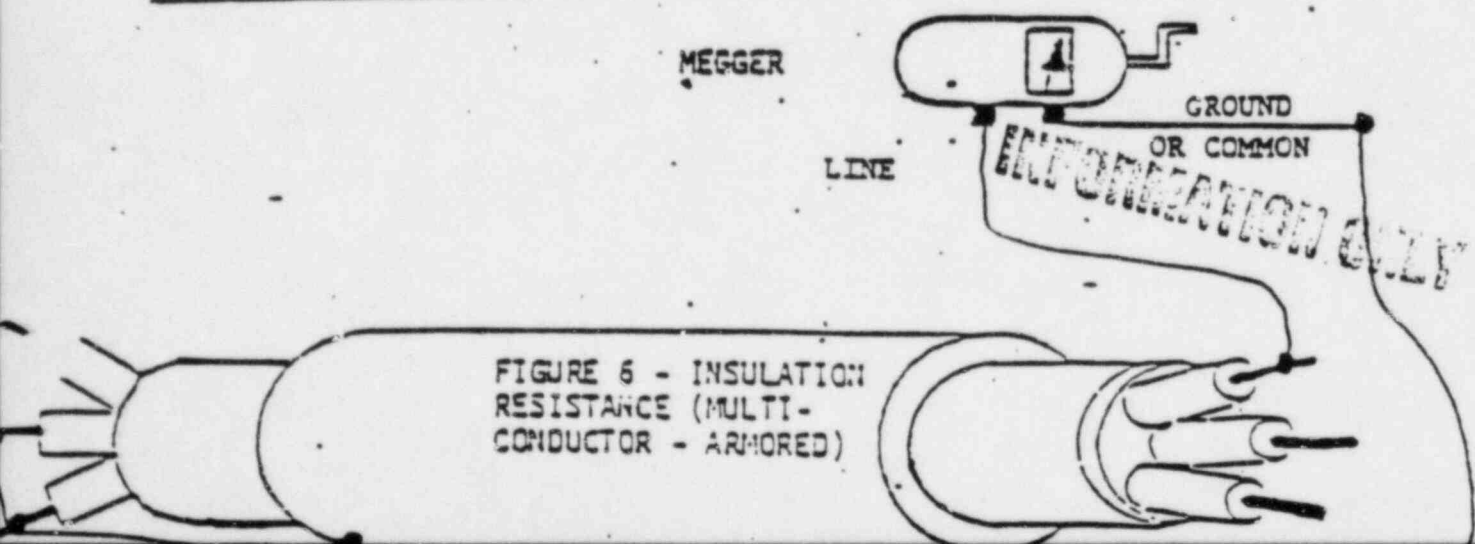
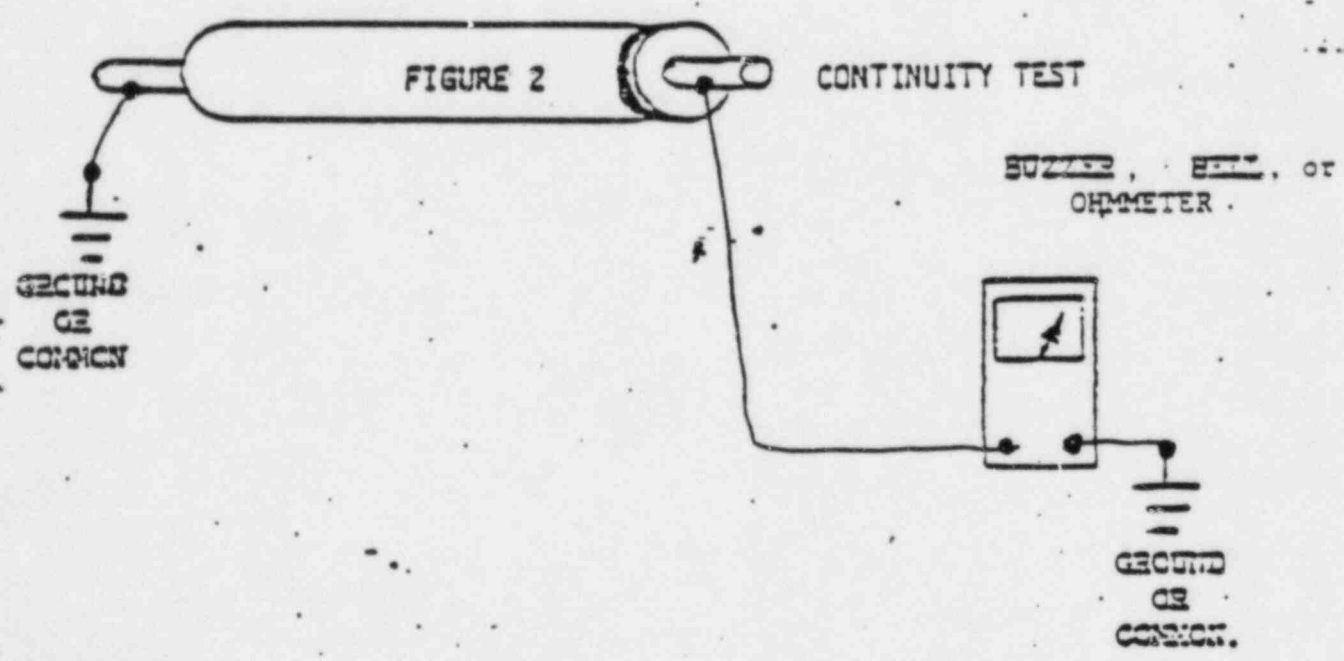
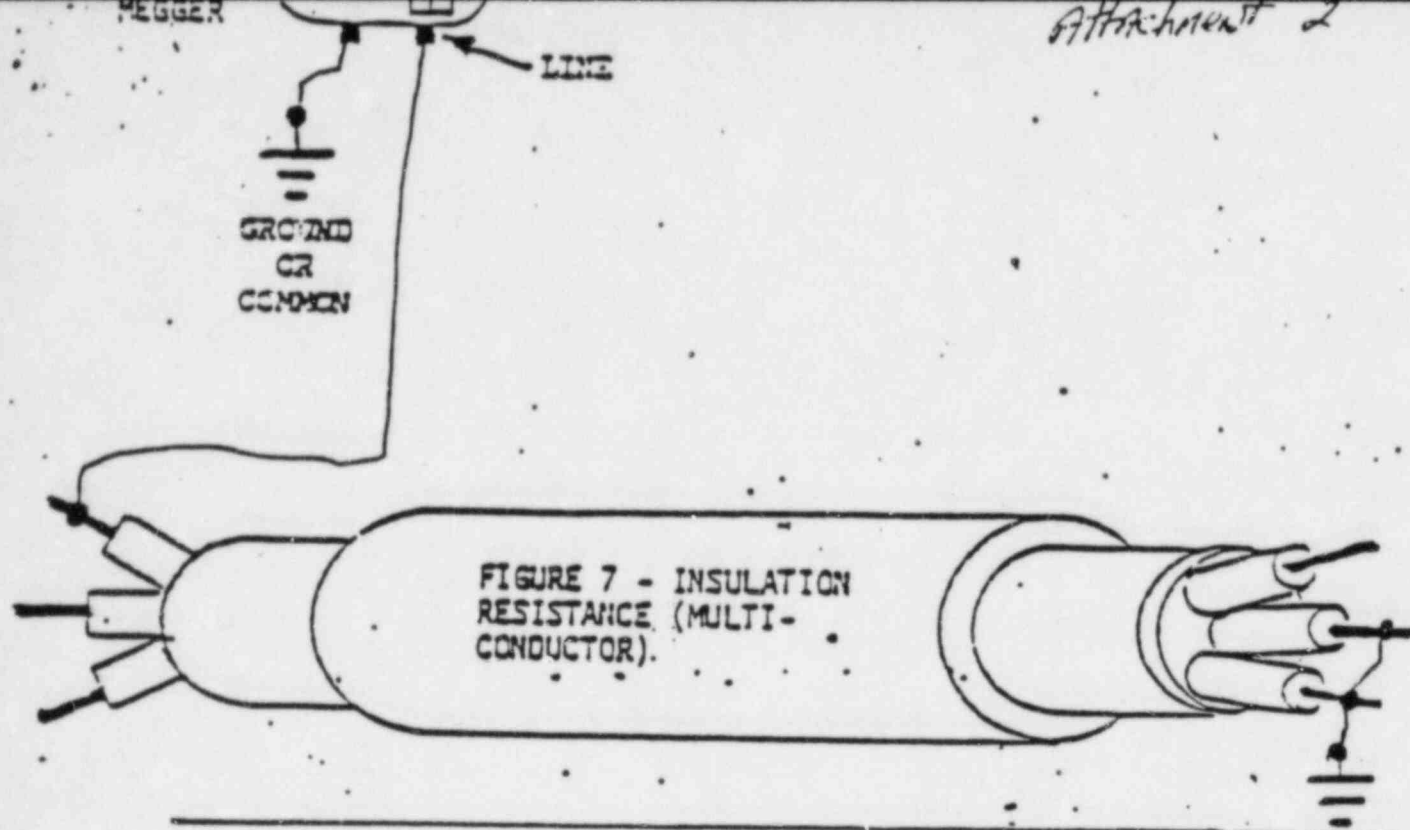
MEGGERING & CONTINUITY TESTING

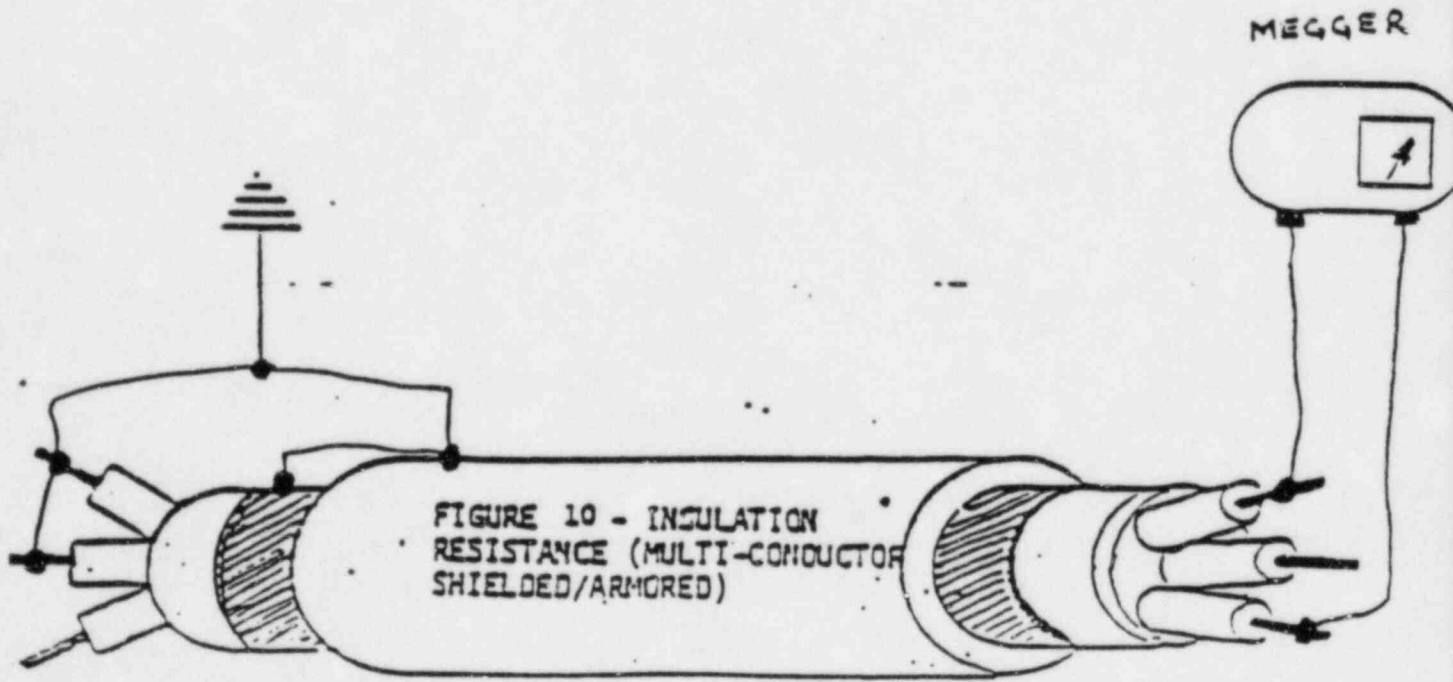
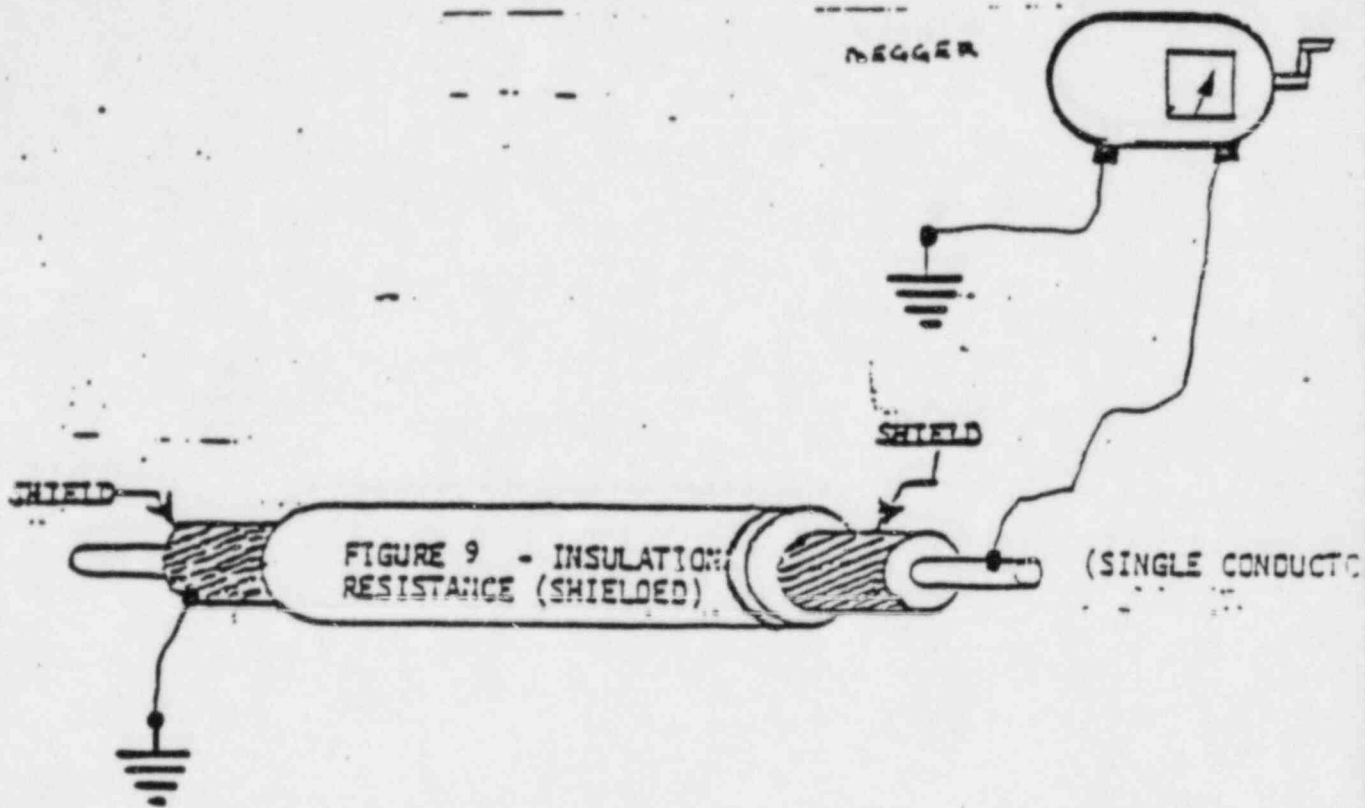
1. Define Continuity Test: A METHOD OF DETERMINING THAT A CONDUCTOR IS A COMPLETE SINGULAR PATH FOR ELECTRICAL CURRENT FROM END TO END.
2. Define Megger Test: AN INSULATION RESISTANCE TEST, USUALLY PERFORMED AT LESS THAN THE RATED VOLTAGE OF THE UNIT OR CABLE UNDER TEST.
3. Medium voltage electrical penetration power conductors shall be tested at 500 VDC (min) and shall have a minimum resistance of 1000 M Ω between the conductor and ground.
4. Low voltage electrical penetration power and control conductors shall have a minimum resistance of 100 M Ω between the conductor and ground.
5. List three pieces of equipment that can be used to conduct a continuity test.
 1. Buzzer
 2. Indicator light
 3. Ohmmeter

* phone
megger
6. Through 10.

Connect the points shown on attached pages to show a correct megger or continuity test.

INFORMATION ONLY





FOR INFORMATION ONLY

L. K. Comstock Engineering Company, Inc.

Memorandum

To: ALL INSPECTORS
From: L. G. Seese
Subject: Timely Review of Documentation

Office: Perry/QCDate: SEP. 14 1982

We have had questions concerning the review of inspection related documentation. This memo is an attempt to clearly lay out that system.

- (1) Inspection Reports, check sheets, N.R.'s and all other documents can be signed by a Level I, II. These documents must be generated the same day as the inspection is complete.
- (2) All Reports will be reviewed by a Level II certified in that area of responsibility. The designated lead inspector will review all documents from his group. Inspections performed by the lead will be reviewed by another Level II. The Level II review will be accomplished within 48 hours of the date the report has been initiated.
- (3) All I.R.'s, N.R.'s need to be reviewed by the Quality Control Supervisor. This will be completed in a timely manner. All documents will be reviewed by all parties within one week of the inspection.


Q.C. Insp. Supv.



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MURRAY R. EDELMAN
VICE PRESIDENT
NUCLEAR

April 15, 1983

Mr. R. L. Spessard, Director
Division of Engineering
U.S. Nuclear Regulatory Commission, Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

RE: Perry Nuclear Power Plant
Docket Nos. 50-440; 50-441
Response to I.E. Report

Dear Mr. Spessard:

This letter is to acknowledge receipt of Inspection Report Number 50-440/83-06; 50-441/83-06, attached to your letter dated March 16, 1983. This report identifies areas examined by Messrs. P. A. Barrett, K. R. Naidu and P. R. Pelka during their inspection conducted February 8-11, 1983.

Attached to this letter is our response to the three Violations described in the referenced Notice of Violation, dated March 16, 1983. This response is in accordance with the provisions of Section 2.201 of the NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations.

Our response has been submitted to you within thirty days of the date of the Notice of Violation as you required. If there are additional questions, please do not hesitate to call.

Very truly yours,

M. R. Edelman
Vice President
Nuclear Group

MRE:pab
Attachment

cc: Mr. M. L. Gildner
USNRC, Site

Mr. C. E. Norelius, Director
Division of Projects and Resident Programs
U.S. Nuclear Regulatory Commission, Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

U.S. Nuclear Regulatory Commission
c/o Document Management Branch
Washington, D.C. 20555

RESPONSE TO ENFORCEMENT ITEMS

Below is our response to Appendix A, Notice of Violation, of United States Nuclear Regulatory Commission I.E. Report 50-440/83-06; 50-441/83-06.

Noncompliance I. (440/83-06-01; 441/83-06-01)

A. Severity Level IV Violation

10CFR50, Appendix B, Criterion II states, in part, "The quality assurance program shall provide control over activities affecting the quality of the identified structures, systems, and components, to an extent consistent with their importance to safety."

CEI Corporate Nuclear Quality Assurance Program, Section 0200, Revision 4, paragraph 1.1 states in part, "The program provides for accomplishing activities affecting safety under suitably controlled conditions and in accordance with the program elements of procedures, instructions, specifications, and drawings."

Contrary to the above, the L. K. Comstock QA Program failed to provide control over deficiencies identified by an internal LKC documentation task force, in that these deficiencies were addressed in uncontrolled review checklists and internal LKC letters.

B. Response

1. Corrective Actions Taken and Results Achieved

L. K. Comstock has written a QC Inspection Report for each of the concerns identified during the LKC Task Force document review. This will provide for status tracking of each concern until it is fully addressed and closed out.

As identified above, the LKC Task Force generated checklists for each document package as they performed their review to detail their comments. These checklists have been procedurally addressed within the LKC QA program to ensure that each specific item is tracked and resolved prior to turnover.

Along with the contractor's actions, the Cleveland Electric Illuminating Co. (CEI) has developed a Special Project Plan in accordance with the requirements of our "Project Administration Procedures," that defines the actions necessary to resolve the task force issue.

As a part of this program, all of the "task force" concerns have been addressed on Project Organization Surveillance Inspection Reports (SIR's). This duplicates the LKC tracking of these items. The SIR's are assigned to individuals within the Construction Quality Section. This enables CEI to monitor, provide follow-up, and ensure resolution of each item.

2. Corrective Action Taken to Avoid Further Noncompliance

In light of this NRC concern, the PNPP Nuclear Quality Assurance Department Manager re-emphasized to L. K. Comstock by written memorandum that all quality issues shall be processed in strict accordance with the Project approved LKC QA program. On a Project level, this message was additionally directed to all site contractors performing safety-related activities at Perry. In addition, the NQAD Construction Quality Section performed a review of all safety-related contractor's internal correspondence files to insure that quality issues were being processed in strict accordance with their QA programs. This review netted positive results.

In order to provide continuous monitoring of L. K. Comstock, a Project Organization QA representative has been assigned to L. K. Comstock on a full time basis. This individual will monitor all LKC inspection reports and provide a continuing review of documentation packages that are in process to ensure that the Task Force items are being properly addressed.

3. Date When Full Compliance Will Be Achieved

The concerns and individual checklist items noted by the LKC task force have been addressed on QA program documents. Therefore, full compliance has been achieved.

Noncompliance II. (440/83-06-06; 441/83-06-06)

A. Severity Level V Violation

10CFR50, Appendix B, Criterion III, states in part, "The design control measures shall provide for verifying or checking the adequacy of design, such as by the performance of design reviews...performed by individuals or groups other than those who performed the original design...."

CEI Corporate Quality Assurance Program Section 0300 states in part, "CEI performs a design coordination function consisting of selected reviews and design control monitoring program.... These procedures shall assure... "Design activities are conducted in a planned and systematic manner... Perry Safety Analysis Report requirements have been appropriately addressed in design documents...Design requirements can be controlled and inspected and/or tested to specified acceptance criteria."

Contrary to the above, CEI failed to assure that Gilbert Associates Inc. (GAI) adequately reviewed and verified that the requirements of Westinghouse Electric Corporation drawing E-40048 for medium voltage penetrations and electrical specification SP-33 were adequately translated into the isometric drawings 1R-72-3 and 1R-72-4 prepared by Pullman Power Products. Specifically, drawings 1R-72-3 and 1R-72-4 were approved by GAI, without the consumable insert specified on drawing E-40048 and the backing ring specified in paragraph 5:08.1.4C of specification SP-33. Consequently, the medium voltage penetrations were welded in Unit 1 without the benefit of either a consumable insert or a backing ring. Furthermore, there was no assurance that this discrepancy would have been corrected during the installation of medium voltage penetrations in Unit 2.

B. Response

1. Corrective Action Taken and Results Achieved

L. K. Comstock issued Stop Work Notice #11 on the installation of the medium voltage penetrations. The discrepant welding conditions that exist on the Unit 1 medium voltage penetrations have been documented on Nonconformance Report LKC 1769. The nonconformance report has since been dispositioned, accepted, and verified.

2. Corrective Action Taken To Avoid Further Noncompliance

The Construction Quality Section issued Observation Action Request #605 to Gilbert Associates for inadequately reviewing the Pullman Power Products isometric drawings for the medium voltage penetrations. As a result, the Unit 2 penetration drawings will be revised to reflect the specification requirements and GAI personnel have been alerted to assure that drawings are reviewed to the specification governing the work.

To ensure compliance, an owner hold point has been established on the welding of the Unit 2 medium voltage penetrations.

3. Date When Full Compliance Will Be Achieved

Drawing revisions will be completed by May 20, 1983, and full compliance will then be achieved.

Noncompliance III. (440/83-06-03; 441/83-06-03)

A. Severity Level IV Violation

10CFR50, Appendix B, Criterion X states in part, "A program for inspection of activities affecting quality shall be established and executed by or for the organization performing the activity to verify conformance with the documented instructions, procedures, and drawings for accomplishing the activity."

CEI Corporate Nuclear Quality Assurance Program, Section 1000, Revision 3, paragraph 1.1 states in part, "A program for inspection shall be established by CEI to ensure that all safety-related components, systems, structures, and activities affecting those items meet the required quality standards."

Contrary to the above, a program for the inspection of in-process fillet weld activities performed by L. K. Comstock Company had not been established or executed to verify conformance with standard AWS-D1.1 1975, Section 6.

B. Response

1. Corrective Action Taken and Results Achieved

The immediate corrective action taken by L. K. Comstock was to issue Stop Work Notice #10 on all welding performed by LKC.

As a result, a program for the in-process fillet weld activities has now been established by the contractor. This was accomplished through a revision to their weld inspection procedure 4.8.18, paragraph 3.7.

To address the procedure deficiency concerning previous in-process inspections, the contractor initiated Nonconformance Report LKC 1788.

2. Corrective Action Taken to Avoid Further Noncompliance

To prevent recurrence, training was conducted to the revised LKC Weld Inspection Procedure. The procedure currently reflects the in-process weld inspection as required by AWS D1.1-1975.

3. Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

RECEIVED

NO. 2610
Rev. 5 '82

Perry Nuclear Power Plant

MAR 3 1983 ACTION REQUEST

AR 587

File No. 3011032

TRAINING QUALITY

CORRECTIVE ACTION REQUEST

OBS

Number

000

Appendix B

Criteria No.

10

Responsible

Organization

L K C

3.3

Initiated By:

Vernon K. Higaki

Initials

V K H

Issue Date

02/28/83

Governing Requirement: SP - 33-4549-00 Revision IV dated 4/12/82 and associated specification changes required on 2/28/83. Attachment Sp-709-4549-00:

1. Section 1:05.2.1 which states in part: The lines of authority, (continued next sheet)

Observation: During a review of the equipment referenced in Nonconformance Report LKC 1797, it was determined that certified inspectors were performing parts of inspection checklists. Although the checklists required a Level II of a specific certification to sign and indicate final completion of the entire inspection checklist, portions of the checklist were completed by "other inspectors" that in most cases were certified in other areas. The "other inspectors" were qualified to perform these checklist items through other certifications. This is not programmatically addressed and appears to have been the cause of confusion during the LKC Task Force review of documentation/records.

Potentially Reportable Per 10CFR21 or 50.55 e

☐ Yes☒ No

DAR No.

Upgraded to CAR

☒ Yes☐ No

Reviewed for Significance By:

Recommendation: 1) Define what inspector certification(s) are used to sign off specific inspection checklist items. 2) Define the meaning of the interim and final inspector signatures on the inspection checklists. 3) Procedurally address these two definitions. 4) Ensure that previous cases of this condition are identified and verify that all involved inspectors were certified or generate nonconformances or provide re-inspections.

Response Due Date 03/01/83

Cause: Inadequate procedural address.

Acknowledged By:

R. L. Brown 3-1-83

Response (include corrective action and steps to prevent recurrence) 1. A QC Inspection Matrix has been designed and is currently being researched to ascertain which individual checklist items of one discipline can be completed by a certified inspector of another discipline. Once completed, reviewed and accepted this Matrix will be procedurally addressed within LKC Procedure 4.1.4. 2. A checklist is designed to accomplish a procedurally addressed inspection function. The checksheet is a listing of items that lead to a completed inspection function. Certified inspectors of other disciplines may complete specific items of another disciplines checklist as described in the checklist matrix. This individual item will be initialed and dated on the checklist (Continued on third sheet)

Completion Date 03/31/83

Prepared by Larry G. Seese

Response Prepared By:

R. L. Brown

Response Date

03/10/83

Response Evaluation:

Response is adequate; however, restrictions are delineated in the response letter (PY-5/CON 59642A dated March 24, 1983). Verification shall be performed on 3/31/83.

Evaluation:

☒ Accept☐ Reject

CAUSE CODE

1.8

Evaluation By:

Vernon K. Higaki

Evaluation Date:

03/24/83

Verified By:

Verification Date:

Remarks:

Governing Requirement: (Continued)

organizational structure, functional responsibilities, and duties shall be clearly established and delineated in writing." (under score added for emphasis)

2. Section 1:05.10.3.d which states: "The personnel who are qualified to perform the inspections and tests, and to whom they report."

ACTION REQUEST #587

item and will be defined as an interim inspection. The final inspector will be the certified inspector within the given discipline of the checklist who will evaluate each checklist item and by his signature assure that all items are complete. These definitions will be incorporated within Procedure 4.1.4.

3. LKCE Task Force Concerns have been procedurally addressed within LKC Procedure 4.11.1. These items will be completely reviewed and items found in noncompliance will be addressed on an IR or NR as required. Reinspections will be performed if necessary.
4. Items 1 and 2 will be incorporated in LKC Procedure 4.1.4. Once procedurally addressed, all inspectors will be trained to this revision. This will prevent recurrence.



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March 24, 1983

PY-S/CON 5964 QA

L. K. Comstock
P. O. Box 324
Perry, Ohio 44081

Attention: Mr. Richard Bower

RE: CAR # 83-02

Dear Mr. Bower:

I have evaluated the corrective action response provided for CAR # 83-02 and consider the response acceptable. However, until such time that 1) Project Organization has reviewed and approved the referenced matrix and 2) it can be demonstrated that the balance of the corrective action has been implemented, the following restriction shall be enforced.

In the strictest accordance with the L. K. Comstock QA Program, only those inspectors certified Level II and authorized for final sign-off completed checklists shall be permitted to complete items within the checklists.

Portions of those checklists shall not be delegated to "others" uncertified for completion of the final sign off of the specific checklist.

If there are any questions do not hesitate to contact me.

Very truly yours,

Vernon K. Higaki
Responsible Quality Engineer
Construction Quality Section

VKH:fl

cc: J. Kerr
J. Furness
E. Riley
CAR # 83-02 File PAQS
300.204.2
303.033.2.1
D.Graneto



Comstock Engineering, Inc.

A COMSTOCK GROUP COMPANY

PERRY NUCLEAR POWER PLANT
P.O. Box 324
Perry, OH 44081
(216) 259-3755

Cleveland Electric Illuminating Company
P.O. Box 97
Perry, Ohio 44081

June 10, 1983

ATTENTION: VERNON HIGAKI
QAE

CONTROL NUMBER: Q 83-6-622

SUBJECT: CAR 83-02

Dear Mr. Higaki,

L.K. Comstock Quality Control is requesting to change our response to CR 83-02 as follows:

- 1.) The QC inspection matrix as referenced in the original response will not be used or placed in LKC Procedure 4.1.4. LKCE Current inspection practices are, inspection reports and line items on the report will be signed only by inspector who are certified in the given area of certification. Therefore, there will be no need to revise LKC Procedure 4.1.4 to include a QC inspection matrix.
- 2.) Disposition to LKC NR #1797 is currently being worked to by LKCE QC Personnel. Inspections of which a certified inspector performed part of a inspection checklist for a given area of certification which he was not certified in, even though he was certified to perform this same or similar type inspection in a area of certification for which he was certified in and being re-inspected or evaluated for area inspection if required by a certified inspector in that given area of certification.
- 3.) Delete Item #4 of the original response.

Sincerely,

R.L. Bower
QC Manager

CC: T. Woodman
J. Kerr
J. Furness
E. Yockey
C. Hart

RLB/gh

RECEIVED

JUN 13 1983

CQS/ELEC./I&C



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June 21, 1983

PY-S/CON 6439 QA

L. K. Comstock
P. O. Box 324
Perry, Ohio 44081

Attention: Mr. R. Bower

Re: CAR # 83-02

Dear Mr. Bower:

The revised response, dated June 10, 1983, to CAR # 83-02 has been reviewed and considered acceptable. Further, the CAR is considered verified and therefore closed out in total.

The reinspections to resolve Nonconformance Report # LKC 1797 will provide adequate assurance that all previous inspections are satisfactorily addressed.

Very truly yours,

Vernon K. Higaki
Responsible Quality Engineer
Construction Quality Section

James Furness
Lead Quality Engineer
Construction Quality Section

JF:VKH:fl

cc: E. Riley
E. Sterle
J. Kerr
T. Stear
R. Parker
D. Graneto
SO/DCC
Construction Engineering
300.204.2 and 303.033.2.5
DAR # 118 File
CAR # 83-02 File

BACK-UP DOCUMENTATION TO CLOSE CAR#83-02

Construction Quality Section verified that the forms listed below are in compliance with the revised response to CAR#83-02 dated June 10, 1983.

Form 21 - Insulation Resistance/Continuity Test Report

Equipment Number - OP49C002B
OP49C002A

Form 27 - Class 1E Rotating Equipment Insulation Checklist

Equipment Number - OP49C002B
OP49C002A

Form 32 - Class 1E Equipment Installation Checklist

Equipment Number - 2C61P001
OR24S037

Form 39A - Material Receiving Report, Purchased by Utility

Equipment Number - OP49C002B

Form 39C - Cable Receiving Inspection Report

Manufacturer's Reel Number (MR)- 24538
24539

Form 70 - Magnetic Particle Inspection Report

Equipment Number - OR24S037

Form 82 - Conduit Installation Checklist

Conduit Number - 1C54C32X
1E51C157B

Form 97 - Maintenance Verification Record

Equipment Number - OR24S037

Form 99 - Hilti Kwik Bolt Installation Checklist

Conduit Number - 1E31T42B

Form 105A - Cable Pull Inspection Checklist

Circuit Number - 1P45F5A

Form 105B - Prepull Walkdown Checklist

Circuit Number - 1P45F5A

Form 107 - Equipment Weld Documentation Record

Equipment Number - OR24S037

Form 118 - Inspection Report

Specific Inspection Report Numbers

4842	6248	6309
5484	6265	6310
5852	6301	6313
6068	6302	6314
6143	6303	6315
6168	6304	6317
6196	6305	6318
6220	6306	6324