

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

APPLICATION OF TEXAS UTILITIES
GENERATING COMPANY, ET AL. FOR
AN OPERATING LICENSE FOR
COMANCHE PEAK STEAM ELECTRIC
STATION UNITS #1 AND #2
(CPSES)

Docket Nos. 50-445
and 50-446

AFFIDAVIT OF
WILLIAM A. DUNHAM

1 Q: Please state your name and address for the record.

2
3 A: My name is William A. Dunham; my address is 1700 Baywood Dr., Apt.
4 504, Bay City, Texas 77414.

5
6 Q: Mr. Dunham, is there information which you would like to bring
7 before the Atomic Safety and Licensing Board in the operating license hearings
8 for Comanche Peak nuclear plant?

9
10 A: Yes, there is. I would like to testify before the Licensing Board
11 about harassment, intimidation, and threatening of my subordinate quality
12 control inspectors and me by management at Comanche Peak, as well as regarding
13 the quality of protective coatings at the plant.

14
15 Q: Please briefly state your concerns.

16
8311150356 831109
PDR ADDCK 05000445
G PDR

1 A: I was employed at Comanche Peak from November 1981 until I was
2 fired on August 26, 1983. At the time of my termination, I was employed
3 by Brown & Root (the contractor on the job) as a Lead Quality Control In-
4 spector in Protective Coatings, with several other Quality Control Inspectors
5 under my supervision. Harry Williams was Civil Quality Control (QC) Supervisor.
6 He was over Protective Coatings QC at the time of my firing; however, prior
7 to approximately March 1983, he was over not only Protective Coatings QC but
8 over Civil QC as well (including areas such as concrete placement, rebar,
9 and I believe, structural, etc.). He was over about 30 QC inspectors at one
10 time.

11 Attached to my affidavit are four documents which will assist in
12 detailing my concerns:

13 (1) A copy of the October 18, 1983, letter from the U. S. Depart-
14 ment of Labor in Fort Worth, Texas, to Mr. Gordon Purdy, QA Manager, Brown
15 & Root, Glen Rose, Texas, confirming that I was illegally terminated by Brown
16 & Root and ordering my reinstatement, back pay, moving and other expenses,
17 legal expenses, compensatory damages, and purging of my personnel file of
18 any reference of my termination.

19 (2) A copy of my 8-page statement which I provided to the Depart-
20 ment of Labor after my firing.

21 (3) A typed copy of my 8-page statement to the Department of Labor.
22 (Mrs. Juanita Ellis, with the Intervenor CASE, suggested that since the copy
23 quality of my hand-written statement to the Department of Labor was not good,
24 she type a copy for the Board's convenience. I have checked her typed version
25 against my hand-written one, and it is accurate in its content.)

1 (4) A copy of an inter-office Department Correspondence dated
2 August 8, 1983, from J. J. Lipinsky with O. B. Cannon Company to (I assume)
3 his boss, R. B. Roth, under Subject of: Trip Report OBC Job No. H8301 (Comanche
4 Peak Unit 1-Glen Rose, TX). I gave a copy of this inter-office memo to an
5 NRC investigator (I believe it was Don Driskill).

6
7 Q: Please tell us a little more about O. B. Cannon Company and the
8 importance of the inter-office memo.

9
10 A: O. B. Cannon Company is one of the few companies in the country
11 with expertise in protective coatings for nuclear power plants. Brown &
12 Root or the utility hired the company to come to Comanche Peak to evaluate
13 the protective coatings. The inter-office memo by Mr. J. J. Lipinsky, Quality
14 Assurance Director of O. B. Cannon, speaks for itself. I don't have a copy
15 of any other report he might have filed with Brown & Root or the utility.

16
17 Q: In the letter from the Department of Labor (DOL) attached, it
18 appears to indicate that their findings were not based just on your statements
19 to them, but on facts gathered during an investigation made by them following
20 your statements being made. Is that correct?

21
22 A: Yes, it is. They made their findings after making their own inde-
23 pendent investigation.

24
25 Q: Did you go to the Nuclear Regulatory Commission (NRC) with your

1 concerns?

2
3 A: Yes, I did. I went to them in January 1983.

4
5 Q: And did they conduct an investigation?

6
7 A: Yes, they did.

8
9 Q: Were you given a copy of any investigation report by them regarding
10 your concerns?

11
12 A: No, the NRC did not supply me with any such report. I hadn't seen
13 a copy of any report regarding my concerns until I was supplied with a copy
14 of what is marked "In Reply Refer To: Dockets: 50-445/83-07, 50-446/83-04,"
15 under cover letter of March 14, 1983; this was supplied to me by Mrs. Juanita
16 Ellis with the Intervenor CASE.

17
18 Q: And is the portion of that document which pertains to the concerns
19 you raised under item 5, on page 5 of Appendix B of that report?

20
21 A: Yes. But there's no mention in it about the intimidation, harass-
22 ment, and threatening of me and my QC inspectors..

23
24 Q: We won't get into the technical aspects of that report right now.
25 In your hand-written statement to the DOL, you stated that "Mr. Williams

1 has in fact signed a statement, admitting to these acts, in front of a member
2 of the Nuclear Regulatory Commission." Do you know when that occurred?

3
4 A: I believe it was around March of 1983. As I said in my statement
5 to the DOL, that was when he was demoted from Civil QC Supervisor over many
6 departments to Supervisor of the Protective Coatings group alone.

7
8 Q: The documents attached to your affidavit pretty well speak for
9 themselves. Could you tell us of some of the other matters which you perceive
10 to be problems at Comanche Peak, if there are any?

11
12 A: There are so many, it's difficult to remember them all. One of
13 the most disturbing things was that every rejection of protective coatings
14 by QC inspectors is opposed. Yet there's never any opposition or concern
15 about poor quality coatings work being approved. As I said in my statement
16 to the DOL, Harry Williams repeatedly instructed me to pressure inspectors
17 into accepting coating work that was not acceptable per procedure, and he
18 also instructed me to accept unacceptable coatings and sign documents for
19 inspections made by other inspectors.

20
21 Q: In your statement to the DOL, you indicated that you took your
22 concerns to QA/QC management, and you've indicated that you told the NRC
23 as well. What were the results of this (other than your being fired)?

24
25 A: I've talked to the client (TUGCO), to the NRC, to the Brown &

1 Root Legal Department. But nothing ever happened to correct the situation.
2 I've talked until I'm about talked out. There are some definitions that
3 are used at the plant: QC = quality compromise or quality cover-up; and
4 NRC = nobody really cares.

5
6 Q: We won't get into all of your concerns right now. Are you aware
7 of what the status of protective coatings at Comanche Peak is at this time?

8
9 A: It's my understanding that the QC vault in regards to protective
10 coatings has been put on hold by the NRC and that massive falsification of
11 documentation in protective coatings has been discovered. It's also my
12 understanding that Harry Williams was terminated shortly after my firing;
13 but I've heard that he's still with Gibbs & Hill, out in San Diego, I believe
14 it was.

15
16 Q: Harry Williams worked for Gibbs & Hill?

17
18 A: That's my understanding. I believe he was supposed to report
19 to Tom Brandt, but I believe he actually reported directly to Ron Tolson.

20
21 Q: Did you know Bob Hamilton?

22
23 A: Yes. Bob was my first supervisor at Comanche Peak.

24
25 Q: Were you employed at Comanche Peak when Bob Hamilton was fired?

1 A: Yes, I was .

2
3 Q: Do you know why he was fired?

4
5 A: Management said he was fired because he didn't want to walk the
6 rail under what he thought were unsafe working conditions. But I believe
7 he was fired because he was a tough inspector and refused to bend the rules.

8
9 Q: Why should the Licensing Board be concerned about protective coatings
10 at Comanche Peak? What's the bottom line as far as the safety of the plant
11 is concerned?

12
13 A: If there are pinholes in the protective coatings, atomic particles
14 can be trapped, creating hot spots. This creates more danger than is necessary
15 for workers who have to come into the area. Also, it's almost better not
16 to even have protective coatings than to have them fail, because if they
17 come off, they can stop up spray nozzles, sumps, coolant pumps, etc. This
18 was one of the problems they encountered at Three Mile Island.

19 Also, when you have QC inspectors intimidated and harassed and
20 threatened, what you have in effect is a plant that's been built without
21 inspection. If inspections are compromised, you have no quality control
22 at all.

I have read the foregoing 7-page affidavit, which was prepared under my personal direction, and it is true and correct to the best of my knowledge and belief.

William A. Dunham
William A. Dunham

DATE: 11-8-83

STATE OF TEXAS

On this, the 8th day of November, 1983, personally appeared William A. Dunham, known to me to be the person whose name is subscribed to the foregoing instrument, and acknowledged to me that he executed the same for the purposes therein expressed.

Subscribed and sworn before me on the 8th day of November, 1983.

Judy Hanzik, Matagorda Co. Texas
Notary Public in and for the State of Texas

My Commission Expires: 10-14-84



October 18, 1983

Mr. Gordon Purdy
QA Manager
Brown & Root, Inc.
P. O. Box 1001
Glen Rose, Texas 76043

Re: William A. Dunham vs. Brown & Root

Dear Mr. Purdy:

This letter is to notify you of the results of our compliance actions in the above case. As you know William A. Dunham filed a complaint with the Secretary of Labor under the Energy Reorganization Act on September 23, 1983. A copy of the complaint, a copy of Regulations, 29 CFR Part 24, and a copy of the pertinent section of the statute were furnished in a previous letter from this office.

Our initial effort to conciliate the matter revealed that the parties would not at that time reach a mutually agreeable settlement. An investigation was then conducted. Based on our investigation, the weight of evidence to date indicates that William A. Dunham was a protected employee engaging in a protected activity within the ambit of the Energy Reorganization Act, and that discrimination as defined and prohibited by the statute was a factor in the actions which comprise his complaint. The following disclosures were persuasive in this determination:

Facts gathered during the investigation show that Mr. Dunham was scheduled for termination before his final counseling session with Mr. Purdy. He was terminated because he was vocal in his opposition to intimidation, harassment and threats made by management to the QC inspectors.

This letter will notify you that the following actions are required to abate the violation and provide appropriate relief:

1. Reinstatement to his job that he held on the day of his termination with the proper seniority.
2. Back pay for any compensation lost during his time off the job
3. Moving expenses incurred should be reimbursed in full for the amount spent to relocate to his new job and for any amount necessary to return to his old job
4. Expenses incurred while job hunting should be reimbursed in full

5. Legal expenses incurred by Mr. Dunham should be paid in full by Brown & Root
6. Compensatory damages
7. Purging of his personnel file of any reference of his termination.

This letter will also notify you that if you wish to appeal the above findings and remedy, you have a right to a formal hearing on the record. To exercise this right you must, within five (5) calendar days of receipt of this letter, file your request for a hearing by telegram to:

The Chief Administrative Law Judge
U. S. Department of Labor
Suite 700, Vanguard Building
1111 - 20th Street, NW
Washington, DC 20036

Unless a telegram request is received by the Chief Administrative Law Judge within the five-day period, this notice of determination and remedial action will become the final order of the Secretary of Labor. By copy of this letter I am advising William A. Durham of the determination and right to the Chief Administrative Law Judge. If you decide to request a hearing, it will be necessary to send copies of the telegram to William A. Durham and to me at Room 7A12, 819 Taylor Street, Fort Worth, Texas 76102. After I receive the copy of your request, appropriate preparations for the hearing can be made. If you have any questions do not hesitate to call me.

It should be made clear to all parties that the role of the Department of Labor is not to represent the parties in any hearing. The Department would be neutral in such a hearing which is simply part of the fact-development process, and only allows the parties an opportunity to present evidence for the record. If there is a hearing, an Order of the Secretary shall be based upon the record made at said hearing, and shall either provide appropriate relief or deny the complaint.

Sincerely,

Curtis L. Poer
Area Director

①

I was terminated Aug. 26, 1983 in direct violation of Public Law 95-106 and the Energy Reorganization Act of 1974. My job was Lead Quality Control Inspector in Coatings.

I was terminated because I complained to Quality Control Mgmt. that Harry Williams, my supervisor, was harassing, intimidating, and threatening my subordinate inspectors and me.

~~This fact~~ Mr. Williams has in fact signed a statement, admitting to the acts, in front of a member of the Nuclear Regulatory Commission.

As a result of this statement, Mr. Williams was demoted from Civil Q.C. Supervisor over many departments to Supervisor of our group alone.

This served two purposes for Q.C. Mgmt. The first purpose was to punish the Q.C. Coatings Department for complaining to the N.R.C. The second purpose was to punish Mr. Williams for getting caught.

After his visits with the N.R.C. Mr. Williams' threats and intimidation stopped for about two weeks. Then, the harassment, intimidation and threats began again. Mr. Williams repeatedly instructed me to pressure inspectors into accepting coating work that was not acceptable per procedure. He also instructed me to accept unacceptable coatings and sign documents for inspections made by other inspectors.

(2)

I went to Mr. Gordon Purdy after Mr. Williams held a meeting and said "There will be no more N.C.R.'s written by this group. (N.C.R. means Non-Conformance Report and there is a law that says anyone who sees a non-conforming condition must report it.)"

Mr. Dan Farris was at this meeting with Mr. Purdy and me. I complained to Mr. Purdy about Mr. Williams' threats, harassment and intimidation of Nuclear Quality Control Inspectors. Mr. Purdy said "Needless to say, we had complaints concerning Mr. Willie before." He also said, "I'll stir the kettle a bit and see what I can come up with." He also assured me that he would keep this meeting confidential. He lied. An hour and a half later,

I was summoned by Mr. Williams to go to Mr. Ron Tolson's office. Tolson is the Texas Utilities Generating Co. Site Quality Assurance Supervisor. As such, he is the top Quality Representative on site.

As an opening conversation, Mr. Tolson said, "Boy, what's this Bullshit about Harassment and Intimidation." Then Mr. Tom Brandt (Harry Williams' Supervisor) came in and I was questioned by both men. I couldn't get one question answered before the other man would interrupt my answer with another question.

Later, Mr. Purdy came in and Mr. Tolson and Mr. Brandt calmed down. Mr. Brandt wanted to know why I

didn't report to him first. I said it was because he fired Charles Atchison for much the same thing. Then, Mr. Pardy insisted that he was the one that fired Charles Atchison. At this point, I realized my job was in jeopardy. I tried to warn Mr. Tolson that the Coatings Q.C. Inspectors were steadily reporting to the Nuclear Regulatory Commission. He replied "I don't give a damn about the N.R.C. I'll take you over right now and introduce you to them. Now, you're trying to intimidate me!"

I told these top members of Q.C. Mgmt. not to take my word for it, but to ask the other Q.C. Coatings Inspectors. Tom Brandt said he would and he was dismissed from the office.

On (I believe) Aug. 11 a meeting was held with all Q.C. personnel in the Coatings Dept. Also present were all Craft (Coatings) Supervision (for Safety Related areas) and members of Construction Mgmt.

This meeting was held to try to ease tension between Craft and Q.C. It was announced that there would be free beer and bar-b-q after work for all Coatings Q.C. and Craft Supervision (An inspector who had already resigned due to all the harassment and I attended this Bar-b-q. We were the only Q.C. inspectors that attended. The same day at the meeting

①

that anyone with suggestions that would help the construction effort should come forward and present them (I did this the following day, by suggesting that thousands of dollars could be saved and quality improved by eliminating the zinc primer for small repairs and replacing it with a two coat epoxy system as other Nuclear Plants had done. I believe this demonstrates a good attitude.)

At this same meeting, (Aug. 11) Quality Control was represented by a man known to me only as "Curley". After the meeting Tom Miller and I approached "Curley" and asked if the new program that Construction was promising would mean an end to harassment, intimidation, and threats of Q.C. Inspectors. I pointed out numerous examples of what was happening. He said he would look into it and acted sincerely concerned.

On Aug. 18 a meeting was held primarily to tell the inspectors that they were too picky. At this meeting "Curley" said he had investigated my complaint and that it had no merit. He assured us, "No physical contact will occur."

Physical Contact is not the only method of impeding and intimidating Nuclear Quality Control Inspectors.

On Aug. 23 Mr. Harry Williams informed me that Friday was no longer my day off and for me to be sure and come in on Friday.

On Friday, Aug. 26, Mr. Harry Williams was absent. This same day @ 12:30 P.M. I was told by Evert Mouser to attend a meeting in Mr. Gordon Purdy's office @ 4:30.

At 3:00 P.M. Tom Brandt's secretary Lori Sargent called and asked for my badge number. I believe this was to prepare my termination. At 4:00 P.M. Evert Mouser came to make sure I attended the 4:30 meeting. He repeatedly denied that he knew what the meeting was about and said that he was also called and asked his badge number.

Present at the 4:30 meeting, which lasted only about two minutes, were "Curley" Mr. Gordon Purdy, Evert Mouser and I. Mr. Purdy slid a memo with carbon copies across the table and said "Bill, I'd like for you to read this and sign it please." I read most of the memo. It stated in part that it was disruptive to a sensitive organization, rude, and had a bad attitude, that I had repeatedly voiced a lack of confidence in O.C. Grant and any further examples of this would be cause for my immediate termination. I told Mr. Purdy that I couldn't sign it. (There was no room for any comment on the memo.) (3 part memo) -- He said "I'll have to take you to the gate then." I said, "I'm not leaving."

my attitude towards Quality. "I'll get another job." He stormed from his office and used a phone down the hall. (He had a phone on his desk) I stepped into the hall and it sounded like he said "Go ahead with it."

On the way to my office to collect my personal belongings, Evert Mouser admitted that my termination was the reason Harry Williams was absent that day. He also admitted this again at the office in front of other people.

At the time office my checks were ready (the vacation check was short and I like this corrected) and my time had stopped @ 4:30. I was asked to sign a statement to the effect that insubordination

was the true and correct cause for my termination. My rating by Mr. Purdy was fair.

Previously, I came to this plant on another Brown Boveri Nuclear Project with an excellent rating, and I have left a recommendation from former Supervisor.

I have met Mr. Purdy only twice. Once when I went to him with my complaint and once at this termination conference.

When I was asked to sign the statement that insubordination was the true and correct cause for my termination, I

wrote "Fucking Lie" instead of my signature because at this point I was no longer employed by anyone and I felt that with checks in hand, at this point

(1)

I had nothing to lose.

Evert Mouser held a meeting at 5:00 the same day and he and "Curley" lied to the inspectors and said that I had lost my temper and quit. Additional meetings were held and Mouser maintained for days that I had lost my temper and quit. This is a total lie.

I have never been a subordinate to Mr. Purdy. He is head of the A.S.M.E. organization (American Society of Mechanical Engineers). I was employed in the non-ASME organization. I was not employed by "Curley" and don't even know his name. I contend my counseling for attitude was not legal and that my termination was a pre-arranged conspiracy. My supervisor was not present, his supervisor was not (Tom Brandt's super) present, nor was Mr. Tolson.

I ask for relief from this illegal termination, back pay, reinstatement, legal fees, travelling expenses while searching for work, reimbursement for deposits and leaving expenses.

In addition, due to the serious nature of this Federal offense, and due to the fact that this is not an isolated incident but a continuing management policy, I ask for exemplary damages in the amount of one million dollars.

②-58

The preceding statements are
true and correct, to the best of my
knowledge.

Wm. A. Dunham
attachment: Organization Chart

COPY OF HAND-WRITTEN STATEMENT BY WILLIAM A. DUNHAM TO DEPARTMENT OF LABOR

Sir:

I was terminated Aug. 26, 1983, in direct violation of Public Law 95-106 and the Energy Reorganization Act of 1974. My job was Lead Quality Control Inspector in Coatings.

I was terminated because I complained to Quality Control Mgmt. that Harry Williams, my supervisor, was harrassing, intimidating, and threatening my subordinate inspectors and me.

Mr. Williams has in fact signed a statement, admitting to these acts, in front of a member of the Nuclear Regulatory Commission.

As a result of this statement, Mr. Williams was demoted from Civil Q.C. Supervisor over many departments to Supervisor of our group alone. This served two purposes for Q.C. Mgmt. The first purpose was to punish the Q.C. Coatings Department for complaining to the N.R.C. The second purpose was to punish Mr. Williams for getting caught.

After his visits with the N.R.C., Mr. Williams' threats and intimidation stopped for about two weeks. Then, the harrassment, intimidation and threats began again. Mr. Williams repeatedly instructed me to pressure inspectors into accepting coating work that was not acceptable per procedure. He also instructed me to accept unacceptable coatings and sign documents for inspections made by other inspectors.

I went to Mr. Gordon Purdy after Mr. Williams held a meeting and said "There will be no more N.C.R.'s written by this group." (N.C.R. means Non-Conformance Report and there is a law that says anyone who sees a non-conforming condition must report it.

Mr. Dan Farris was at this meeting with Mr. Purdy and me. I complained to Mr. Purdy about Mr. Williams' threats, harrassment and intimidation of Nuclear Quality Control Inspectors. Mr. Purdy said "Needless to say, we've had complaints concerning Mr. Williams before." He also said, "I'll stir the kettle a bit and see what I can come up with." He also assured me that he would keep this meeting confidential. He lied. An hour and a half later, I was summoned by Mr. Williams to go to Mr. Ron Tolson's office. Mr. Tolson is the Texas Utilities Generating Co. Site Quality Assurance Supervisor. As such, he is the top Quality Representative on site.

As an opening conversation, Mr. Tolson said, "Boy, what's this bullshit about harrassment and intimidation?" Then Mr. Tom Brandt (Harry Williams Supervisor) came in and I was questioned by both men. I couldn't get one question answered before the other man would interrupt my answer with another question.

Later, Mr. Purdy came in and Mr. Tolson and Mr. Brandt calmed down. Mr. Brandt wanted to know why I didn't report to him first. I said it was because he fired Charles Atchison for much the same thing. Then, Mr. Purdy insisted that he was the one that fired Charles Atchison. At this point, I realized my job was in jeopardy. I tried to warn Mr. Tolson that the Coatings Q.C. Inspectors were steadily reporting to the Nuclear Regulatory Commission. He replied "I don't give a damn about the N.R.C. I'll take you over right now and introduce you to them. Now, you're trying to intimidate me!"

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This meeting was held to try to ease tension between craft and Q.C. It was announced that there would be free beer and bar-b-que after work for all Coatings Q.C. and Craft Supervision. (An inspector who had already resigned due to all the harrassment and I attended this bar-b-que. We were the only Q.C. inspectors that attended.)

Mr. Gene Crane said at the meeting that anyone with suggestions that would help the construction effort should come forward and present them. (I did this the following day, by suggesting that thousands of dollars could be saved and quality improved by eliminating the zinc primer for small repairs and replacing it with a two coat epoxy system as other nuclear plants had done. I believe this demonstrates a good attitude.)

At this same meeting, (Aug. 11) Quality Control was represented by a man known to me only as "Curley." After the meeting, Tom Miller and I approached "Curley" and asked if the new program that Construction Mgmt. was promising would mean an end to harrassment, intimidation, and threats of Q.C. Inspectors. I pointed out numerous examples of what was happening. He said he would look into it, and acted sincerely concerned.

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On Friday, Aug. 26, Mr. Harry Williams was absent. This same day @ 12:30 P.M. I was told by Evert Mouser to attend a meeting in Mr. Gordon Purdy's office @ 4:30.

At 3:00 P.M. Tom Brandt's secretary, Lori Sargent, called and asked for my badge number. I believe this was to prepare my termination. At 4:00 P.M. Evert Mouser came to make sure I attended the 4:30 meeting. He repeatedly denied that he knew what the meeting was about and said that he was also called and asked his badge number.

Present at the 4:30 meeting, which lasted only about two minutes, were "Curley," Mr. Gordon Purdy, Evert Mouser and I. Mr. Purdy slid a memo with carbon copies across the table and said "Bill, I'd like for you to read this and sign it please." I read most of the memo. It stated in part that I was disruptive to a sensitive organization, rude, and had a bad attitude, that I had repeatedly voiced a lack of confidence in Q.C. Mgmt. and any further examples of this would be cause for my immediate termination. I told Mr. Purdy that I couldn't sign it. (There was no room for any comment from me on this 3 part memo.)

He said, "I'll have to take you to the gate then." I said, "I'm not changing my attitude towards Quality." "I'll get another job." He stormed from his office and used a phone down the hall. (He had a phone on his desk.) I stepped into the hall and it sounded like he said, "Go ahead with it."

On the way to my office to collect my personal belongings, Evert Mouser admitted that my termination was the reason Harry Williams was absent that day. He also admitted this again at the office in front of other people.

At the time office my checks were ready (the vacation check was short and I'd like this corrected) and my time had stopped @ 4:30. I was asked to sign a statement to the effect that insubordination was the true and correct cause for my termination. My rating by Mr. Purdy was "Fair." Previously, I came to this plant from another Brown & Root Nuclear Project with an "excellent" rating, and I have letters of recommendation from former Supervisors. I have met Mr. Purdy only twice. Once when I went to him with my complaint and once at this termination conspiracy. When I was asked to sign the statement that insubordination was the true and correct cause for my termination, I wrote "Fucking Lie" instead of my signature because at this point I was no longer employed by anyone and I felt that, with checks in hand, at this point I had nothing to lose.

Evert Mouser held a meeting at 5:00 the same day and he and "Curley" lied to the inspectors and said that I had lost my temper and quit. Additional meetings were held and Mouser maintained for days that I had lost my temper and quit. This is a total lie.

I have never been a subordinate to Mr. Purdy. He is head of the A.S.M.E. organization (American Society of Mechanical Engineers). I was employed in the Non-A.S.M.E. organization. I was not employed by "Curley" and don't even know his real name. I contend my counseling for attitude was not legal and that my termination was a pre-arranged conspiracy. My supervisor was not present, his supervisor (Tom Brandt) was not present, nor was Mr. Tolson (Tom Brandt's Super.) present.

I ask for relief from this illegal termination, back pay, reinstatement, legal fees, travelling expenses while searching for work, reimbursement for deposits and moving expenses.

In addition, due to the serious nature of this Federal Offense, and due to the fact that this is not an isolated incident but a continuing management policy, I ask for exemplary damages in the amount of One Million Dollars.

The preceding statements are true and correct, to the best of my knowledge.

(Signed) Wm. A. Dunham

Attachment: Organization Chart

DEPARTMENTAL CORRESPONDENCE

QAD-83-0096
August 8, 1983

TO: R. B. Roth cc: J. J. Norris
FROM: J. J. Lipinsky

SUBJECT: Trip Report OBC Job No. H8301 (Comanche Peak Unit 1-Glen Rose, TX)

The writer was on the subject site July 26, 27, and 28, 1983.

The following individuals were met while on site:

M. R. McBay (TUSI) Engineering Manager
C. T. Brandt (EBASCO) Project Non-ASME QC Supervisor
Gene Crane (TUSI) Construction Resident Manager
Jerry Hoops (EBASCO) Personnel
John Merritt (TUGCO) Manager of Start-Up
T. L. Miller (EBASCO) Paint Inspector
R. Tolson (TUGCO) QA Manager
Mark Wells (Gibbs & Hill) Engineer
Harry Williams (Gibbs & Hill) QC Paint Supervisor

The following activities were performed while on site:

- July 26, 1983 - Meet C. T. Brandt (Ebasco)
- Walk site with Harry Williams (Gibbs & Hill)
- Meet R. Posgay (OBC) - discuss painter qualifications and site conditions/problems in general
- Meet Mark Wells (Gibbs and Hill)
- Get Badged
- July 27, 1983 - Walk around site - observe work on polar crane and dome
- Brief meeting with R. Tolson (TUGCO) and C. T. Brandt (Ebasco) - preliminary assessment by J.J.L. that Comanche Peak has problems in areas of material storage, workmanship (quality of work and painter qualification & indoctrination), not satisfying ANSI requirements and possibly coating integrity. All of above could affect NRC licensing to which R. Tolson replied "That's not my job or concern".

Also discussed former OBC employees with emphasis on T. L. Miller (Ebasco). R. Tolson (TUGCO) asked J.J.L. if J.J.L. would rehire T. L. Miller (Ebasco). J.J.L. replied "Depending on circumstances, yes". C. T. Brandt (Ebasco) volunteered to have T. L. Miller (Ebasco) at the airport by three o'clock.

- July 27, 1983 - Go through project specifications
- Meet with swing shift inspection personnel
- Observe swing shift work on polar crane and dome
- July 28, 1983 - Meet JJN and give run down on observations and potential problem areas
- Meet with Mark Wells (Gibbs and Hill) and go over specification 2323AS31 and FSAR commitments to ANSI Standards. ANSI N5.12, 101.2, 101.4 (which ties into N45.2) and Regulatory Guide 1.54 are referenced in either the specification or FSAR.
- Advise JJN on specification/FSAR commitments
-Meeting with J. Merritt (TUGCO), G. Crane (TUSI)
R. Tolson (TUGCO), M. McBay (TUSI), JJN, JJJ
- A) JJN gave introduction which included the fact that the Comanche Peak site is committed to ANSI requirements and JJN then attempted to turn over discussion to JJJ.
- B) JJJ started by stating that based on observations and specification/ANSI commitments that there are areas for people to be concerned about at Comanche Peak.
- JJJ briefly reviewed for the individuals present that OBC has had extensive experience on nuclear projects, and that OBC is familiar with various means/methods of satisfying ANSI requirements.
- R. Tolson (TUGCO) asked for examples of specific problem areas or items.
- JJJ replied that specifics cannot be given without a thorough review/audit. However, described problems with material storage, painter qualification/indoctrination, possible documentation deficiencies, and morale problems.
- C) JJJ indicated that by Brown and Root estimates, only 34 out of 452 individuals are of any value as painters. JJJ also stated that if quality work is put in place then they would be a long way to resolving site problems. Further JJJ stated that there is currently a "No Win" situation on site between the craft and QC Inspectors, and even though this sounds corny, Brown and Root needs to develop a "Win-Win" situation.

Conversation at this point took off on the areas of assuring that individuals putting work in place are doing an adequate job or get disciplined, and changing morale.

- D) Discussion then centered on what if any changes OBC would recommend for the specification. Essentially Brown & Root is happy with the level of enforcement/inspection currently in force for the specification/procedure requirements. Also a change in the specification this late in the game would only confuse matters on site. JJN to come up with a DCA for touch-up.
- E) Problems with the quality of the air supply (takes up to half of the shift to have the oil problem corrected) were discussed and how to correct same.
- F) Availability and qualification of inspection personnel was discussed. JJN suggested that J. Coogan (BEI) may have some people available. J. Merritt (TUGCO) suggested J. Coogan contact Jerry Hoops (Ebasco).

-Meeting with J. Church (TUGCO-VP) J. Merritt (TUGCO)
JJN, JCL

- A) J. Merritt (TUGCO) reviewed/summarized discussion of earlier meeting.
- B) J. Merritt (TUGCO) directed JJN/OBC to do no more (other than recommend alternative air supply) until notified by TUGCO.

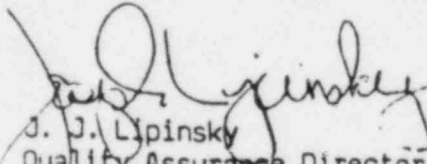
The following are the writers observations/opinions as a result of this site visit:

- A) To some extent a parallel can be drawn with Comanche Peak and Zimmer. Comanche Peak is doing inspections to the degree that they (Comanche Peak) are comfortable with or will tolerate. However in the real world there are requirements that have to be satisfied, and in at least the areas of material storage, painter qualification/indoctrination, documentation and traceability indications are that Comanche Peak falls short in adequately satisfying these requirements. The writer's opinion is that management at Comanche Peak has deluded itself into thinking everything is alright or it will all come out in the wash. The fact that management attempts to squash any efforts to point out quality problems (No NCR's, QC reporting to production, etc.) to some extent confirms the above, and has led to a morale problem with the inspection staff.

- B) Almost everyone in the inspection staff is looking to get out of Comanche Peak. The inspection staff works 60-70 hours a week. You can't work people on an extended basis even with high salaries (apparently only a few stay a whole year). In addition to the long hours the inspectors contacted by the writer (other disciplines included) all have a low opinion of the quality of the work put in place, and in effect are keeping quiet until they can find another job.
- C) The writer did not feel comfortable with the way JJN presented the ANSI requirements. This has been discussed with JJN, and to a certain extent the writer feels that at the least the manner of presentation was counter productive to Cannon's efforts. The writer would like to state for the record that OBC does satisfy all applicable ANSI requirements and has done so on numerous nuclear projects.
- D) JJN and JJJ discussed the possibility of OBC performing an in-depth audit. The writer cannot recommend an audit at this time because B&R is hostile to the idea and no action would be taken by B&R on problems/concerns detected during the audit.
- E) High DFT of CZ#11 is power ground to acceptable DFT. This would burnish or polish the zinc, and possibly result in poor adhesion of the top coat.
- F) Old Phenoline 305 (between 1-2 years old) is being topcoated with new Phenoline 305 with little or no surface preparation (solvent wipe).

SUMMARY:

- 1) This trip was not as productive as the writer had hoped. Often the writer felt that B&R wanted to buy the "right" answer. This is substantiated to some extent by the fact that they did not try to utilize the expertise and/or experience of the writer with regard to Quality Assurance/Quality Control, and the attitude of the B&R management (especially Quality Assurance).
- 2) If OBC tries to obtain a contract on this site, the writer would suggest that it be a rework contract because it will be impossible (by all indications) to salvage what work is currently in place.


J. J. Lipinsky
Quality Assurance Director



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV

611 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TEXAS 76011

March 14, 1983

In Reply Refer To:
Dockets: 50-445/83-07
50-446/83-04

Texas Utilities Generating Company
ATTN: R. J. Gary, Executive Vice
President & General Manager
2001 Bryan Tower
Dallas, Texas 75201

Gentlemen:

This refers to the inspection conducted by Messrs. L. D. Gilbert and C. E. Johnson of our staff during the period January 27-28 and February 1-2, 1983, of activities authorized by NRC Construction Permits CPPR-126 and CPPR-127 for the Comanche Peak facility, Units 1 and 2, and to the discussion of our findings with Mr. R. G. Tolson of your staff at the conclusion of the inspection.

Areas examined during the inspection and our findings are discussed in the enclosed inspection report. Within these areas, the inspection consisted of selective examination of procedures and representative records, interviews with personnel, and observations by the inspectors.

During this inspection, it was found that certain of your activities were in violation of NRC requirements. Consequently, you are required to respond to this violation, in writing, in accordance with the provisions of Section 2.201 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Your response should be based on the specifics contained in the Notice of Violation enclosed with this letter.

Two new unresolved items are identified in paragraph 5 of the enclosed report.

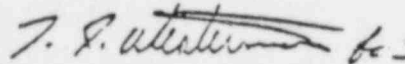
In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosure will be placed in the NRC Public Document Room unless you notify this office, by telephone, within 10 days of the date of this letter, and submit written application to withhold information contained therein within 30 days of the date of this letter. Such application must be consistent with the requirements of 2.790(b)(1).

March 14, 1983

The response directed by this letter and the accompanying Notice is not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,



G. L. Madsen, Chief
Reactor Project Branch 1

Enclosures:

1. Appendix A - Notice of Violation
2. Appendix B - NRC Inspection Reports 50-445/83-07
50-446/83-04

cc w/encl:

Texas Utilities Generating Company
ATTN: H. C. Schmidt, Project Manager
2001 Bryan Tower
Dallas, Texas 75201

APPENDIX A

NOTICE OF VIOLATION

Texas Utilities Generating Company
Comanche Peak Unit 1

Docket: 50-445/83-07
Permit: CPPR-126

Based on the results of an NRC inspection conducted during the period January 27-28 and February 1-2, 1983, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 47 FR 9987, dated March 9, 1982, the following violation was identified.

Failure to Follow Procedure

Criterion V of Appendix B to 10 CFR Part 50 requires that activities affecting quality shall be prescribed by documented procedures of a type appropriate to the circumstances, and shall be accomplished in accordance with the procedures.

Brown & Root, Inc., Construction Procedure CP-CPM 9.10, Revision 8, paragraph 3.2.4, specifies that the fit-up gap for "T" fillet joints should not exceed 1/16"; however, if the gap is in excess of 1/16", but not exceeding 5/32", this condition will be considered acceptable provided the leg of the fillet weld is increased by the amount of separation in excess of 1/16".

Contrary to the above, on January 28, 1983, the NRC inspector determined that Pipe Support Mark No. SW-1-102-106-Y33K had been welded with a fit-up gap of 1/4" at one end of the "T" fillet joint which attached piece 7 to piece 4. The 1/4" fit-up gap exceeds the 5/32" maximum allowable fit-up gap requirement of Procedure CP-CMP 9.10.

This is a Severity Level V Violation. (Supplement II.E) (445/8307-01)

Pursuant to the provisions of 10 CFR 2.201, Texas Utilities Generating Company is hereby required to submit to this office, within 30 days of the date of this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Dated: _____

APPENDIX B

U. S. NUCLEAR REGULATORY COMMISSION
REGION IV

Reports: 50-445/83-07
50-446/83-04

Dockets: 50-445
50-446

Category A2

Licensee: Texas Utilities Generating Company
2001 Bryan Tower
Dallas, Texas 75201

Facility Name: Comanche Peak, Unit 2

Inspection At: Comanche Peak Steam Electric Station

Inspection Conducted: January 27-28 and February 1-2, 1983

Inspectors: *D. M. Hunnicutt* *3/9/83*
for L. D. Gilbert, Reactor Inspector, Engineering
Section (paragraphs 1, 2, 3, 4, and 7) Date

D. M. Hunnicutt *3/9/83*
for C. E. Johnson, Reactor Inspector, Engineering
Section (paragraphs 1, 5, 6, and 7) Date

Reviewed: *T. F. Westerman* *3/10/83*
T. F. Westerman, Chief, Reactor Project Section A Date

Approved: *D. M. Hunnicutt* *3/9/83*
D. M. Hunnicutt, Chief, Engineering Section Date

Inspection Summary

Inspection Conducted January 27-28 and February 1-2, 1983 (Report 50-445/83-07)

Areas Inspected: Special, announced inspection to follow up on allegations on pipe and pipe support welds and protective coatings. The inspection involved 48 inspector-hours by two NRC inspectors.

Results: Within the three areas inspected, one violation was identified (failure to follow procedure, paragraph 2.a).

Inspection Conducted January 27-28 and February 1-2, 1983 (Report 50-446/83-04)

Areas Inspected: Special, unannounced inspection to follow up on allegations on pipe welding records. The inspection involved 12 inspector-hours onsite by one NRC inspector.

Results: In the area inspected, no violations or deviations were identified.

DETAILS

1. Persons Contacted

Principal Licensee Personnel

- *R. G. Tolson, Site Quality Assurance (QA) Supervisor, TUGCO
- *C. T. Brandt, Quality Assurance/Quality Control (QA/QC) Supervisor, TUGCO
- *D. N. Chapman, QA Manager, TUGCO

Other Personnel

- *G. R. Purdy, Site QA Manager, Brown & Root (B&R)
- W. E. Baker, Senior Project Welding Engineer, B&R
- E. Opelski, Site NDE Level III, B&R
- J. Patton, QC Mechanical Superintendent, B&R
- H. Williams, QC Superintendent, Non-ASME, B&R
- B. Wallace, Lead QC, Protective Coatings, B&R
- B. Dunham, Lead QC, Backfit Program, B&R

The NRC inspectors also interviewed other licensee and contractor employees during the course of the inspection.

*Denotes those attending the exit interview.

2. Followup to Allegations on Pipe Support Welds in Unit 1.

A special inspection was performed to follow up on an allegation that three pipe support fillet welds were fit-up and welded with excessive gap. The three pipe supports were identified as: SW-1-012-010-A33R, SW-1-102-106-Y33K, and CC-1-087-004-A33A.

- a. A documentation review of Pipe Support Mark No. SW-1-102-106-Y33K provided the following information. The support is a safety-related ASME Code Class 3 NF support for the service water piping system. The weld attaching piece 7 to piece 4 is classified as a "T" fillet joint that was welded by welder BLU in August 1981 using Welding Procedure WPS 11032 and Construction Procedure CP-CPM 9.10.

To permit inspection of the fit-up gap, a portion of the weld was removed from the fillet weld designated on Pipe Support SW-1-102-106-Y33K alleged to have an excessive gap. The NRC inspector measured the gap as being 1/4". The 1/4" gap exceeds the 5/32" maximum allowable fit-up gap requirement of Procedure CP-CPM 9.10 for "T" fillet joints.

This is an apparent violation of 10 CFR 50, Appendix B, Criterion V, for failure to follow procedure.

The allegation, as it relates to Pipe Support SW-1-102-106-Y33K, was substantiated.

- b. A documentation review of Pipe Support Mark No. SW-1-012-010-A33R provided the following information. The support is a safety-related ASME Code Class 3 NF support for the service water piping system. The weld attaching piece 18 to piece 19 is classified as a "T" fillet joint. The support was welded by welder BLU in November 1980 using Welding Procedure WPS 11032 and Construction Procedure CP-CPM 9.10.

To permit inspection of the fit-up gap, a portion of the weld was removed from the fillet weld designated on Pipe Support SW-1-012-010-A33R as having excessive gap. The NRC inspector measured the gap as being 1/16".

The 1/16" gap meets the fit-up gap requirements of Procedure CP-CPM 9.10 for "T" fillet joints.

No violations or deviations were identified.

The allegation as it relates to Pipe Support SW-1-012-010-A33R was not substantiated.

- c. A documentation review of Pipe Support Mark No. CC-1-087-004-A33A provided the following information. The support is a safety-related ASME Code Class 3 NF support for the component cooling water piping system. The weld attaching piece 45 to piece 55 is classified as a partial penetration "T" joint. The support was welded by welder BMG in February 1981 using Welding Procedure WPS 11032 and Construction Procedure CP-CPM 9.10.

In reviewing the joint design and fit-up requirements for the partial penetration "T" joint, the NRC inspector determined that the joint design requires a 3/8" bevel on the 1/2" thick material and a 0-3/16" fit-up gap which would give the appearance of having an excessive fit-up gap for a "T" fillet joint. Also, it should be noted that the strength of the partial penetration "T" joint would not be affected by increasing the fit-up gap, where as, the strength of the "T" fillet joint could be affected by increasing the fit-up gap.

No violations or deviations were identified.

The allegation, as it relates to Pipe Support CC-1-087-004-A33A, was deemed to be without technical merit.

3. Followup to Allegations on Pipe Welding in Unit 1

A special inspection was made to follow up on an allegation that a weld, identified as FW 1-B on Drawing CT-1-SB-017, contained unconsumed consumable insert material hanging down on the interior of the pipe and excessive radial shrinkage which could cause flow problems.

After performing an inspection of the weld and reviewing the radiographs of the weld, the NRC inspector determined that the material hanging down approximately 1/16" was caused by melting through the weld root for an area 3/32" in diameter. The melt-thru condition meets the ASME Code requirements for weld reinforcement and radiographic quality.

Radial shrinkage occurs in all pipe weldments, but its effects are predominate in large bore, thin wall stainless steel piping. Weld FW 1-B does exhibit radial shrinkage which was accepted by QC on final visual inspection and adequate flow within the pipe will be demonstrated during the preoperational test of the containment spray system (Preoperational Test 1-CT-PT-48-01).

No violations or deviations were identified.

The allegation, although partially substantiated, is without technical merit.

4. Followup to Allegations on Pipe Welding in Unit 2

A special inspection was made to follow up on an allegation that the weld documentation for Weld FW 1 on Drawing MS-2-RB-19 for the main steam system has been lost and reconstructed, but does not include the two repairs and, therefore, the weld may be defective.

The NRC inspector reviewed Nonconformance Report NCR M-3425, Revision 1, which stated that the weld data card package had been lost and dispositioned the weld to "USE AS IS" based on other information being available to reconstruct the weld data card sufficiently to satisfy the ASME Code requirements for weld documentation.

After reviewing the nonconformance report, reconstructed weld data card, and other available documentation which included weld rod issue records, weld material certification records, drawing requirements, piping material certification records, welder qualification records, procedure qualification reports, and radiographs and radiographic inspection reports for the weld; the NRC inspector determined that sufficient information was available on the weld and two repairs to provide adequate assurance that the weld, as repaired, is of good quality and meets the ASME Code requirements for Class 2 welds.

No violations or deviations were identified.

The allegation that the weld data card was lost was substantiated, but is without technical merit.

5. Protective Coatings

The purpose of this inspection was to substantiate allegations concerning unsatisfactory coatings application in the Skimmer Pump Room and the Drain Tank Heat Exchanger in Reactor Building (RB) Unit 1 being accepted by QC

as satisfactory. There was also some concern of the use of manufacturer's recommendations when performing patch tests when using the Elcometer 106 Adhesion Tester.

The NRC inspector also reviewed the overall coatings program to determine if there were any other QA problems. The inspection covered a review of procedures, records, observation of the areas in question; a review of the backfit, and ongoing in-process program.

a. Review of Coating Procedures

The NRC inspector reviewed protective coatings procedures and specifications for the application and inspection of work in process and for the backfit program established.

The purpose of this review was to determine if the licensee had incorporated all necessary standards, codes, and manufacturer's recommendations into the QC procedures used in the field by QC inspectors.

During this review of procedures, the NRC inspector observed that Gibbs & Hill Specification 2323-AS-31, "Protective Coatings," stated in paragraph 9.2.2.e, in part, "An Elcometer 106 Adhesion Tester or equal shall be used for patch testing in accordance with the recommendations of the manufacturer of the instrument." The NRC inspector then reviewed the manufacturer's recommendations. The NRC inspector observed an instruction of the manufacturer's operating instruction that was not referenced in any of the QC procedures. This instruction states, "When the adhesive curing time has elapsed, a cut is made around the dolly through the coating to the substrate (this is especially critical for electro-plated coatings) with a sharp knife or special cutter obtainable from Elcometer Instruments Limited." After a brief investigation and interviews with QC personnel by the NRC inspector of this matter, it was found that no QC procedure referenced this instruction, nor were QC inspectors performing this function. There was some doubt by the NRC inspector whether this procedure was necessary. The NRC inspector informed the licensee of this finding. The licensee immediately contacted the manufacturer to determine if this procedure was necessary. Through a telephone conversation, the manufacturer of this instrument stated that the procedure in question was not necessary, except for electro-plated coatings, which is not the case at this site.

The NRC inspector has determined that this is an unresolved item until a letter from the manufacturer confirms this. (445/8307-02)

The NRC inspector observed in Civil Construction Procedure (CCP)-30, paragraph 4.4.1.1, item 6, that cure time before topcoat shall be in accordance with Attachment 3, which contains graphs that specify hours of cure time with respect to temperature of Carbo Zinc II primer after application. During a discussion with QC personnel, it

was found that QC inspectors check for ambient conditions before primer is applied and record time. However, after primer is applied, the start of curing is not recorded on any inspection report (IR).

The NRC inspector has determined that if QC is to perform an accurate curing time in accordance with the graphs, they must record a starting time after application and an ending time for curing on the IR.

This will be considered an unresolved item. (445/8307-03)

Procedures reviewed are listed below.

- . CP-CPM-13.1, "General Calibration Procedure"
- . CP-QP-18.0, "Inspection Reports"
- . CP-QP-2.1, "Training and Certification of Inspection Personnel"
- . CCP-30, "Coating Steel Substrates Inside Reactor Buildings and Radiation Areas"
- . QI-QP-2.1-4, "Qualification of Protective Coating Inspection Personnel"
- . 2323-AS-31, "Protective Coatings"
- . 35-1195-IEI-15, Revision 5, "Calibration of Mechanical Dry Film Thickness Gages"
- . 35-1195-IEI-36, Revision 2, "Calibration of Coating Adhesion Tester"
- . CCP-30A, "Coating Steel Substrates Inside Reactor Buildings and Radiation Areas"
- . QI-QP-11.4-1, "Inspection of Steel Substrate Surface Preparation and Primer Application"
- . QI-QP-11.4-5, "Inspection of Steel Substrate Primer Repair and Seal and Finish Coat Application and Repair"
- . QI-QP-11.4-23, "Reinspection of Seal Coated and Finish Coated Steel Substrates For Which Documentation Is Missing or Discrepant"
- . QI-QP-11.4-24, "Reinspection of Protective Coatings on Concrete Substrates for which Documentation is Missing or Discrepant"

b. Observations

M&TE Calibration Shop

The NRC inspector reviewed calibration procedures for the Mechanical Dry Film Thickness Gage (DFT) and the Elcometer 106 Adhesion Tester, as indicated in paragraph 5.a. The inspector also observed the calibration of the Adhesion Tester by a technician. The test was performed by the weight method, which is an acceptable test. Calibration records were up to date and the equipment was calibrated during the required intervals.

No discrepancies were noted.

Skimmer Pump Room

The NRC inspector and several QC inspectors visually inspected the Skimmer Pump Room and the R. C. Drain Tank Heat Exchanger Room in the reactor building at E1.808'-00". This inspection was performed because of allegations concerned over unsatisfactory protective coatings being accepted as satisfactory. The main concern was the floor in the heat exchanger room. The NRC inspector and QC inspectors noticed some unsatisfactory areas on the floor, however, some unsatisfactory spots had already been prepared for repair and the remainder had not because of the temporary stop work order. During the course of the inspection, the NRC inspector located all IRs related to coatings application in these areas. It was found that proper documentation of unsatisfactory conditions were reported for these areas in question and work was being performed as corrective action.

There is no substantial evidence to this allegation in the areas of concern.

c. Review of Records

The NRC inspector reviewed many records of steel and concrete coatings applications and inspections. Documentation was readily retrievable and legible. There were no discrepancies observed. IRs reviewed are listed below.

<u>IR#</u>	<u>NCR#</u>
PCR 00879	C-82-0030
PCR 00874	
PCR 00899	
PCR 02274	
PCR 00872	
PCR 02246	
*PCR 01652	
PCR 01233	
PCR 01071	
PCR 01419	
PCR 00721	
PCR 01045	
PCR 01046	
PCR 01846	
*PC 48805	
*PC 48760	
*PC 48693	
*PC 48721	
*PC 48302	
*PC 48670	
*PC 48750	
*PC 48190	

*PC 48675
*PC 48747
*PC 48633

*Skimmer Pump Room/R. C. Heat Exchanger Room

d. Review of QC Personnel Qualifications

The NRC inspector reviewed approximately 18 qualification records to determine that inspection personnel were qualified to inspect activities in the area of protective coatings. The inspectors were qualified in accordance with site procedures.

e. Protective Coatings Program

The overall coatings program consisting of the backfit program and ongoing in-process program since report 81-15 shows substantial improvement in areas such as retrievable documentation and more specific inspection criteria for QC.

No violations or deviations were identified.

6. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, violations, or deviations. An unresolved item related to testing of protective coatings is discussed in paragraph 5.a. A second unresolved item, related to curing time for protective coatings, is discussed in paragraph 5.a.

7. Exit Interview

The NRC inspectors met with licensee representatives (denoted in paragraph 1) and R. G. Taylor (NRC resident reactor inspector) on January 27-28 and February 1-2, 1983, and summarized the scope and findings of the inspection.