

Date: July 2, 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSIONDOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of)
COMMONWEALTH EDISON COMPANY)
(Byron Nuclear Power Station,)
Units 1 & 2)

Docket Nos. 50-454 OL
50-455 OL

SUMMARY OF TESTIMONY OF
MALCOLM L. SOMSAG

- I. Mr. Somsag is the Site Quality Assurance Supervisor for Hunter Corporation at the Byron Station. Mr. Somsag testified previously in this proceeding primarily to respond to Mr. Smith's allegations regarding Hunter Corporation. (See ff. Tr. 2883 and Tr. 3950-3959.) Mr. Somsag's earlier testimony describes Hunter Corporation's Quality Assurance Department at Bryon and his responsibilities in that Department.
- II. Mr. Somsag's testimony describes the measures taken by Hunter Corporation which respond to the Licensing Board's concerns set forth in its Initial Decision regarding Hunter's program for assuring that missing component supports and documentation regarding supports are properly addressed. (See Initial Decision ¶¶ D-137-145 and D-169.) Mr. Somsag also addresses Mr. Smith's tabling allegation, inasmuch as that allegation gave rise to the above-mentioned Board concern. Finally, Mr. Somsag addresses the statement made by the Board with respect to Commonwealth Edison's Quality Assurance Department Finding regarding the manner in which Hunter initially documented rejected characteristics during the 1983 Reinspection Program.
- III. With respect to Hunter Corporation's program for assuring that missing supports and documentation are properly addressed, Mr. Somsag describes the inspection programs implemented by Hunter which are designed to assure that 100% of the component

supports installed by Hunter are inspected during installation, following completion of the work and, again, prior to turning over a system to the Station. (pp. 2-4.) To demonstrate the effectiveness of these inspection programs, Mr. Somsag testifies that during the course of the 1983 Reinspection Program, which included a review of supports, there was not one instance in which documentation for safety-related component supports was missing or one instance where documentation existed but the associated component support was not installed.

IV. Mr. Somsag explains why he did not consider Mr. Smith's allegations concerning tabling to be significant, but that given the significance of the issue to the Board he attempted to recall whether the events described by Mr. Smith could have occurred and determine their significance. (p. 6.) He concludes that during the course of audit 059-3 Mr. Smith initially selected some supports which were non-safety-related and accordingly instructed Mr. Smith to remove these supports from those to be reviewed for the audit. These are the supports which Mr. Somsag believes Mr. Smith alleges were tabled. (p. 7.) Since the non-safety-related supports were not subject to quality assurance review, Mr. Somsag concludes that there is no safety significance attributable to their omission from the audit. (p. 8.) Moreover, Mr. Somsag testifies that had the practice of tabling existed, evidence of the practice would have surfaced during subsequent inspections. The fact that no such evidence was uncovered leads Mr. Somsag to conclude that there is no safety significance to Mr. Smith's tabling allegations. (p. 8.)

V. Mr. Somsag explains that during an early period of the Reinspection Program Hunter inspectors noted rejected characteristics in their inspection reports. At the time, it was intended that the nonconformances identified in the reports would be made the subject of discrepancy or nonconformance reports following completion of the Reinspection Program. (pp. 8-9.) However, Hunter changed its practice and began noting rejected characteristics on appropriate QA documentation and continued to follow this practice throughout the course of the Reinspection Program.

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TESTIMONY OF
MALCOLM LEO SOMSAG

Q1: Please state your name.

A1: Malcolm L. Somsag.

Q2: Did you previously provide testimony in this proceeding in the spring of 1983?

A2: Yes.

Q3: At that time, you stated that you were the Hunter Corporation Quality Assurance Supervisor for the Byron project. Do you still hold that position?

A3: Yes. The descriptions of Hunter Corporation, my background and my responsibilities as Quality Assurance Supervisor set forth in my prefiled testimony submitted in the spring of 1983 are still accurate.

Q4: What is the scope your testimony?

A4: My testimony describes the steps taken by Hunter Corporation, including evaluation of the Quality Control Inspector Reinspection Program, which respond to the Licensing Board's concerns set forth in its Initial Decision.

Those concerns focus on Hunter's program for assuring that missing component supports and documentation regarding supports are properly addressed. Mr. Smith's allegations regarding "tabling" were also deemed by the Licensing Board to relate to this issue.

Q5: Mr. Somsag, what assurance do you have that component supports which are required to be installed at the Byron plant are installed, have been inspected, are acceptable and that these matters are properly documented?

A5: Three separate inspection programs which have been or are being implemented by Hunter Corporation provide such assurance. First, as discussed in my 1983 prefiled testimony, in response to NRC inspection 80-05 Hunter conducted an inspection of 100% of the supports installed prior to March 1, 1980. This program included a physical inspection of each support and a review of the associated documentation to assure among other things that the hangers were properly installed in accordance with construction specifications and as-built documentation. Nonconforming supports were identified, the nonconformances were documented and reinspected following any additional work necessary to cure the nonconformances.

Second, in 1980 Hunter Corporation formally established an expanded inspection program. The program consists of four broad inspection types to which all safety-related work, including the installation of safety-related supports, is subjected. Type 1 inspections are conducted

during initial installation activities to assure the existence and adequacy of required documentation relative to the work being performed. Type 2 inspections are also conducted during installation activities and are designed to assure that the hardware meets design requirements and that the documentation continues to reflect the status of construction and inspection. Once the work and Type 1 and 2 inspections associated with the work on a construction drawing are completed, Type 3 inspections are conducted to verify the overall adequacy of the work. Type 3 inspections consist of a detailed review of documentation generated during construction to assure that all required inspections have been conducted, are documented and that the hardware conforms to the requirements of the construction drawing and associated as-built documentation. Type 4 inspections occur before turning over systems to the Station to assure that the previously inspected hardware is still in place, intact and undamaged. Hangers installed prior to March 1, 1980 were also subject to Type 3 and Type 4 inspections. During each of these inspections, a document is generated for each category and item of hardware inspected, and identifies whether it is acceptable or unacceptable. If unacceptable, the noncomplying condition is corrected and reinspected in accordance with Hunter's quality assurance procedures. The requirements for the Type 1 through 4 inspection program are set forth in Hunter Corporation Site Implementation Procedure

4.201.

Finally, the 1983 Reinspection Program conducted to review selected inspections performed by Hunter quality control inspectors included a review of component supports installed by Hunter Corporation. The Reinspection Program did not identify one instance in which documentation for safety-related component supports required by the design was missing or an instance where documentation existed but the associated component support was not installed. This further confirms the adequacy of the system devised for assuring that supports have been and are being installed and inspected, and that the inspections are properly documented.

Q6: In its Initial Decision, the Licensing Board expressed concern regarding the possibility that hangers which had been installed and inspected would subsequently be removed during construction, with no followup inspection. Does Hunter have procedural controls to address this type of situation?

A6: Yes. The Type 4 inspection program described in my previous answer was specifically developed in part to deal with such a concern. The program requires a scheduled follow-up physical inspection of 100% of the safety-related hardware installed by Hunter to assure that the installations have remained in place, intact and undamaged. If design documents require the existence of an item, and that item were not in place, this condition would be identified,

documented and corrected.

If, following completion of Type 3 or 4 inspections, hardware is removed or altered other than as would be required by a design change, the program requires that a Hardware Removal/Alteration Report be utilized to report the change of status of the hardware. The report is routed to the Quality Assurance Department and triggers reinspection to assure the hardware has been reinstalled and is acceptable. If hardware is removed or altered as a result of a design change Type 1 through 4 inspections would be conducted with regard to this work.

Q7: Mr. Somsag, are you familiar with Mr. Smith's testimony regarding the practice of "tabling" which he alleges occurred at Byron?

A7: Yes.

Q8: Please describe your understanding of Mr. Smith's testimony concerning this alleged practice.

A8: As I understand it, Mr. Smith alleged in broad terms that there was a practice within Hunter Corporation of setting aside issues relating to the adequacy of component supports, with no assurance that later inspections would be conducted to verify the adequacy of the work. In support of this allegation, Mr. Smith stated that during the course of the 059-3 audit he discovered that there were pipe hangers with no associated documentation and documents with no

associated hangers and was instructed not to include these matters in the audit report.

Q9: Have you given further thought to Mr. Smith's allegations since you last testified in 1983?

A9: Yes. Quite frankly, at the time I heard and reviewed Mr. Smith's testimony during the 1983 hearings, I did not attribute much significance to Mr. Smith's allegations regarding tabling. Mr. Smith left Hunter in early 1980. At that time very few hangers had been permanently installed and I knew that the 1980 inspection following NRC inspection report 80-05 and the expanded inspection program discussed above would have uncovered any concerns such as addressed by Mr. Smith. However, following my review of the Licensing Board's Initial Decision and in light of the significance which the Board placed upon Mr. Smith's allegations regarding tabling, I attempted to recall whether the events described by Mr. Smith may have occurred and determine the significance of these events.

Q10: What is your recollection of the events described by Mr. Smith?

A10: As I recall, during the initial phases of the 059-3 audit Mr. Smith was directed to gather a data base of hangers in the plant. I was informed that there appeared to be a significant number of hangers which were installed without QC inspections and accompanying documentation and in other cases hangers appeared to have some amount of documentation yet the installation could not be physically

located. I reviewed the data base Mr. Smith had gathered in the plant and discovered that the system designations for some of the supports were systems where one would not expect to find safety-related hardware. The data base collected by Mr. Smith was reviewed to ensure that it included only safety-related hangers, because the audit was only intended to evaluate safety-related work, and it was determined that there were indeed some hangers in the data base that were non-safety-related. I then instructed that the non-safety-related hangers be excluded from the audit and ordered that Mr. Smith gather an additional data base comprised of safety-related hangers, to replace the non-safety-related hangers he had previously selected. I believe that the non safety-related hangers which I instructed be excluded from the audit were the hangers which Mr. Smith alleges were tabled.

Q11: What assurance did you have that the incompleated non safety-related hangers initially selected by Mr. Smith would be completed?

A11: I knew that the production department would most likely use the hanger field problem system or, in any event, utilize the final walkdown to identify and resolve any incompleated non-safety-related work.

Q12: In your opinion, does the specific instance raised by Mr. Smith support his general allegation regarding tabling by Hunter Corporation?

A12: No, since the supports which Mr. Smith identified initially were non safety-related supports their omission from the 059-3 audit cannot be viewed as an attempt to disregard, or set aside, a safety concern related to the work performed by Hunter.

Q13: Have subsequent programs implemented by Hunter verified that the practice of tabling of safety-related issues did not occur?

A13: Yes, I believe that if the practice of tabling issues related to safety-related supports had occurred, the inspection programs described in Answer 5 above, would have uncovered evidence of such a practice. The fact that no such evidence was uncovered leads me to conclude that there is no safety significance to Mr. Smith's allegations concerning tabling.

Q14: In its Initial Decision, the Board characterized Finding 1, Part A of Commonwealth Edison Company's Audit Report 6-83-66 of the Reinspection Program as reflecting a continuing failure on Hunter's part to take appropriate steps to issue documentation on nonconforming conditions. In your view, should the finding in Audit Report 6-83-66 be interpreted in this manner?

A14: No. The finding reflects the fact that during an early period of the Reinspection Program rejected characteristics were not documented on discrepancy reports and nonconformance reports but rather were documented on the

QC inspector's inspection reports. This system was adequate to track the quality of previous inspectors' work which was the primary goal of the Reinspection Program. During this time Hunter intended to utilize the inspection reports to issue discrepancy or nonconformance reports following completion of the Reinspection Program to assure that the nonconforming condition was addressed. Therefore, we believed that this system was adequate to document nonconforming conditions identified during the Reinspection Program. Nonetheless, Hunter implemented the practice of noting rejected characteristics on appropriate quality assurance documentation and continued to follow this practice throughout the course of the Reinspection Program.