



LOUISIANA
POWER & LIGHT

142 DELAPONDE STREET • PO BOX 6008
NEW ORLEANS, LOUISIANA 70174-6008 • (504) 366-2345

ROTH S. LEDDICK
Senior Vice President
Nuclear Operations

January 3, 1984

W3K84-0005
Q3-A35.01

TO: QA Personnel
FROM: R. S. Leddick
SUBJECT: Interviews

The purpose of this letter is to advise you that, during the next two weeks, LP&L QA personnel will be conducting interviews with Ebasco and other onsite QA personnel. This is being done at my direction in order to identify any quality concerns that you may have. We also plan to conduct Exit Interviews with you prior to your leaving the Waterford Project. During these interviews, you should feel free to express any quality concerns you may have. No one need fear retribution for anything disclosed during the interview and you can remain anonymous if you wish.

LP&L intends to construct and operate Waterford 3 as safely as possible. Your help in achieving this goal will be greatly appreciated.


R. S. Leddick

RSL/cb

cc: Interviewees

8506110691 850222
PDR FOIA
GARDE84-507 PDR

FOIA-84-507
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LP&L QUALITY ASSURANCE
INTERVIEW QUESTIONNAIRE

INTERVIEWEE: _____

DATE: _____

INTERVIEWERS: 1. _____

2. _____

PURPOSE: Interviews are being conducted at the direction of the LP&L Senior Vice-President Nuclear Operations for the purpose of identifying quality concerns that individuals may have. You should feel free to express any quality concerns you may have. No one need fear retribution for anything he says. You can remain anonymous if you wish.

ON SITE: _____

1. What is your primary area of responsibility?

Response:

2. Do you feel that you have been free to perform your assigned duties and to identify problems?

Response:

3. During the course of your employment at Waterford, are you aware of any quality concerns that have not been properly identified or addressed?

Response:

4. Are you aware of any cases of forged signatures/initials or falsified records?

Response:

5. Do you have any specific quality concerns that you would like to discuss?

Response:

6. Is there anything which you would like to bring to our attention?

Response:

INTERVIEWEE (Signature Optional)

INTERVIEWER (Signature)

INTERVIEWER (Signature)

1/5/84

INTERVIEWEE: 1-A

RECEIPT ACKNOWLEDGED:

③

Robert M. Perry

VAIRG Review Groups not on Dec Contr. Dist.)

1.1 List.) Installation of Review Group being
I.A.C. with latest Rev of Proc

QC-7 1/4 has 2 Attachments "3.1" both different,
1.2 Both listed as Rev 2

Rewrite

P-752 Remark Procedure Requires that All CP's,
1.3 WQC's, and ASE's to be referenced
on remark Form. This is not being
done for the result of a deficient items
only. Work that is associated with the
repair of the deficient item have no
Procedure list or remark Form making
reinstallation of associated work indeterminate
(Ex - correct Case)

QC-169 and GIR (Form No. 1-8) is being utilized

that are submitted by the Inspector when an
approved Procedure Checklist does exist.)

(Original Installation Acceptance Criteria)

1. Acceptance Criteria Not Referenced other than WQC-169

2. Attributes of Approved Inspection Criteria
not listed

6018 improperly closed.) Corrective Action was derived

1.5 At too late to implement

FOIA-84-507



LOUISIANA
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NEW ORLEANS, LOUISIANA 70174-6008

(504) 366-2345

January 11, 1984

W3K-84-0059

Q-3-A35.01

Response Req'd: Yes

By: January 25, 1984

TO: A. M. Cutrona
Manager, Site Quality Program
Ebasco Services, Inc.

FROM: *T. F. Gerrets*
T. F. Gerrets
Corporate QA Manager

SUBJECT: Waterford SES Unit 3
Quality Concerns



Listed below is a compilation of the concerns expressed by various individuals during the interview sessions conducted by LP&L QA. The concerns, as stated, are generic, therefore, it may be a mechanism is already in effect to cover the concern.

- 1.1 Review group is not supplied with document revision list, therefore may be reviewing to obsolete drawings.
- 1.2 WQC-7, Rev. 4 contains two (2) attachments 3.1. Both attachments are listed as Rev. 2 but are different.
- 1.3 CP-752 requires all procedures used be referenced on rework form. If associated work is being done (example, cable determinated to facilitate conduit replacement), the associated procedures not included. See NCR W3-7482.
- 1.4 The General Inspection Report (WQC-1-8) is being used in lieu of the specific inspection form, therefore work does not have the inspection criteria imposed as did the original work.
- 1.5 Reference NCR 6018. Were the previously notated (prior to NCR disposition) minor inspection reports re-reviewed to determine major/minor status?
- 1.6 Reference QAIRG's No. 120, Item (C) requires listing document work was accomplished by. This is not being used.
- 1.7 Is there a cross-reference log for Fischbach & Moore and Ebasco NCR's, both directions?

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- 1.8 Lost "Field Inspection Checklists" are reconstructed without field verification.
- 1.9 Documentation of problem resolution not supported in hanger packages submitted for closure. (Example hanger CHR-557 on Line LW3CH57).
- 1.10 Conflicting information, relative to "Weld at Pipe Shop" symbol, between hanger travelers and piping travelers.
- 1.11 During the preliminary as-built review, approximately 80% of the drawings were reviewed. Have, or when will, the balance of the drawings be reviewed?
- 1.12 Ref. RFI-006. Discrepancy between ESSE and code, relative to weld symbols.
- 1.13 Are contractor NCR's automatically submitted to Ebasco and assigned the W3 number? Are contractor NCR's evaluated for 10CFR50.55(e) reportability? (Mercury)
- 1.14 How is the traceability of anchor bolts maintained?
- 1.15 QC personnel are being told not to address discrepancies if system is released, turned-over, or transferred.

To have the responses available for release to the individuals, it is important for us to have the answers on or before January 25, 1984.

Upon completion of our reviews, there may be additional concerns addressed to you. Thanks for your cooperation in this matter.

TFG/RGB/grf

cc: L. L. Bass
R. G. Bennett
Nuclear Records (2)
~~Central Records~~
Central Records
LP&L Site QA File



LOUISIANA

POWER & LIGHT / INTER-OFFICE CORRESPONDENCE

January 12, 1984

W3K-84-0069

Q-3-A35.01

Response Req'd: Yes

By: January 25, 1984

TO: R. Barkhurst/J. Woods

From:

T. F. Gerrets
T. F. Gerrets

Subject: Waterford SES Unit 3
Quality Concerns

As a result of interviews conducted at the direction of the Senior Vice-President, Nuclear Operations, the following quality concerns were stated relative to LP&L Startup or Plant Operations.

- 2.1 Startup personnel reviews startup activities rather than an independent quality review.
- 2.2 Procedures are approved without field testing or walkdown for adequacy
- 2.3 Deleting of QC witness points could affect QC effectiveness.
- 2.4 Use of hold points rather than witness points slows down testing.
- 2.5 Housekeeping standards are not adhered to; follow-up actions poor.
- 2.6 Lack of procedures hinders effective QC program; (refrigeration, lube samples)
- 2.7 CIWA control and completion process inadequate
- 2.8 Startup places higher priority of test completion than on long-term quality.
- 2.9 Instrumentation line problems have not been fully addressed.
- 2.10 Letters being used in lieu of procedures.

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- 2.11 Emergency Diesel Generator test personnel possibly unqualified.
- 2.12 QC inspector determines points of inspection which should be done by qualified engineers.
- 2.13 QC not involved enough in evaluating dispositions of nonconformances.

To enable responses to be supplied to individuals expressing the above concerns, your assistance is requested. Please provide responses on or before January 25, 1984.

TFG:grf

cc: R. S. Leedick
L. L. Eass
S. Lockhart
Nuclear Records (2)
Central Records
LP&L Site QA File

January 16, 1984

W3K84-0097
Q3-A35.01

TO: T. F. Gerrets
FROM: R. G. Bennett
SUBJECT: Interview Response

To facilitate responding to the concerns addressed during the interviews, your assistance is needed in coordination of the responses.

Concerns are as follows:

- 5.1 Quality Assurance performing work beyond the tasked requirements; training, procurement, procedure writing.
- 5.2 QA Training for plant staff not being implemented in a timely manner.
- 5.3 Memorandums issued by Sr V-P changing procedure to violate ANSI standards.
- 5.4 LP&L in violation of ANSI 18.7 in handling of non-conformance; (reference UNT 2-001)

Your response is requested on or before January 27, 1984.

RGB/cb

cc: R. S. Leddick
J. Sleger
Nuclear Records

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EBASCO SERVICES INCORPORATED

EBASCO

P. O. Box 70
Killona, Louisiana 70066-0070

January 17, 1984
W3QA-27541

Mr. T. F. Gerrets
Quality Assurance Manager
Louisiana Power & Light Company
142 Delaronde St.
New Orleans, Louisiana 70172

RECEIVED
NUCLEAR RECORDS

JAN 20 1984

LOUISIANA POWER & LIGHT COMPANY
WATERFORD STEAM ELECTRIC STATION
1984 - 1165 MW INSTALLATION - UNIT NO. 3
EBASCO'S ANSWERS FOR QUALITY CONCERNS

ILN: _____

Reference: LP&L letter W3K-84-0059 dated January 11, 1984

Listed below is Ebasco's answers to the concerns expressed by various individuals during the interview sessions conducted by LP&L QA.

- 1.1 This appears to be an education problem. There are several lists generated and available on site including the EMDRAC lists, Interdisciplinary Review List, Status of Nuclear Site Procedures, Master Hanger List, etc. Additionally each review group supervisor has a control number which allows the departments to request and receive controlled copies of any document which is issued through Document Control.
- 1.2 A later revision of this procedure is now in effect, deleting all attachments, however, the history copy of Rev. 4 in the vault and at Document Control, only has one Attachment (3.1).
- 1.3 Subject NCR was voided because further investigation revealed the examples provided were not nonconforming and in fact, all required documentation in accordance with site procedures was available. (See attached memo given to Sam Horton - acting QASS) outlining QA's position on subject NCR.
- 1.4 The General Inspection Report is used by Ebasco QC in those instances in which engineering imposes the rework procedure and/or if there is no other applicable inspection report form. The forms applicable for the initial installation may not apply to repair or rework of a completed installation that has been previously inspected and accepted.
- 1.5 No. The NCR does not require them to be re-evaluated.
- 1.6 This was done where possible upon submittal to the vault. It should be noted that some work was done by others and that many were issued on non-safety installations in which Ebasco QA is not now doing a review.
- 1.7 After a point in time, Master Tracking System was entering both the contractor and Ebasco NCR number. Therefore, the cross-reference exists after that. Prior to that, it does not exist. All NCRs (Ebasco and contractor), will eventually be submitted to the vault for indexing and filing in accordance with the Vault Procedure.

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- 1.8 It is T-B/QA management's position that the QC acceptance is the MQC signature and date on the hanger sketch. This item was discussed and agreed to on January 18, 1984 in a meeting with Ebasco QA, LP&L QA and T-B QA. Appropriate corrective action and follow-up training to be implemented by T-B QA.

Reinspection is only required when the lost Field Inspection Checklists are unable to be reconstructed within the package or through other internal T-B records. This is an item that is handled on a hanger-by-hanger basis.

- 1.9 This concern has to do with the method in which an individual may resolve a deficiency. In a particular case cited, the hanger was inspected and accepted on a 4010 walkdown DN. However, it appears that the weld control record was not signed by the inspector for the final visual of two (2) welds. A notation was made by another inspector that the final visual is documented on the DN in the package. As a result of QA review, the WCR was signed and dated by the T-B inspector who closed the DN and dated with the same date the DN was closed. There is no explanation as to what transpired and that the sign-off is a late entry.

The problem and resolution is evident only by going through each package step-by-step and although an explanation would be preferable, the packages should stand on their own.

- 1.10 The pipe spool sketch and piping isometric, reflect a Dravo pressure boundary weld on the support to the spool. Due to changes in configuration, (DCN, FCR, NCR) the piece and/or weld was eliminated. This change will normally only be reflected in the hanger package and the piping documents not updated. The final configuration is in the package that reflects the final construction activity. (See attachment #5)
- 1.11 ESSE has reviewed 95% of the "as-built" Seismic I T-B hanger drawings as of this date. It is anticipated that a total review will be completed by January 27, 1984.
- 1.12 See attached RFI-006 as issued from ESSE, which documents design engineering position.
- 1.13 Mercury is the only site contractor whose NCRs were not automatically submitted to Ebasco for review. Only those NCRs whose disposition was to "use-as-is" and those whose disposition affected the design were submitted to Ebasco and assigned the W3 number. Those Mercury NCRs which were not forwarded to Ebasco were evaluated to the criteria of 10CFR21 by their QA Supervisor as required by Mercury Procedure N49720-SP664, Procedure for Handling of Nonconformances and Corrective Action, as documented by Ebasco Audit SW-83-6-2, specifically page 23 (attached). This evaluation, 10CFR21, also covers the less stringent requirements of 10CFR50.55(e).


Ebasco QA previously had agreed to re-evaluate 1,000 Mercury NCRs for 10CFR-50.55(e) reportability. As of this date, approximately 300 have been reviewed with no change in the original disposition.

In answering the second part of the question; "Yes, all contractor's NCRs are evaluated for 10CFR50.55(e) reportability."

- 1.14 A) CP-710 outlines the requirements for maintaining traceability for embedded anchor bolts during installation.
B) CP-674 outlines requirements for installation of drilled-in concrete expansion anchors.
C) ASP-IV-10 details the material receiving, warehousing and control of anchors prior to releasing to field for installation.
- 1.15 QC Personnel are to follow the attached procedure in addressing discrepancies for systems which have been released, turned-over or transferred to LP&L.

If there are further questions concerning this matter, please contact S. H. Horton, QA Site Supervisor, at extension 490..

Very truly yours,


A. E. Cutrona, Manager
Site Quality Program

AMC/SH/paw

cc: W3QA File
QAS File
R. Bennett
L. Bass



LOUISIANA
POWER & LIGHT

142 DELARONDE STREET • PO BOX 6008
NEW ORLEANS, LOUISIANA 70174-6008 • (504) 355-2345

January 17, 1984

W3K-84- 0109
Q-3-A35.01
Response Req'd: Yes
By: January 30, 1984

TO: A. M. Cutrona
Manager, Site Quality Program
Ebasco Services, Inc.

FROM: *T. F. Gerrets*
T. F. Gerrets
Corporate QA Manager

SUBJECT: Waterford SES Unit 3
Quality Concerns

Listed below is a compilation of the concerns expressed by various individuals during the interview sessions conducted by LP&L QA. The concerns, as stated, are generic, therefore, it may be a mechanism is already in effect to cover the concern.

- 4.1 Welding done on instrument lines without purging.
- 4.2 "Sugaring" on inside of tubing (instrument lines) could cause flow restrictions
- 4.3 Procedural revisions, Ebasco, not being supplied to field personnel
- 4.4 Prior to June '83, T-B had no formal training program for record reviewers.
- 4.5 Qualifications of certain key individuals within Ebasco QA organization are questionable.
- 4.6 Need to establish better working relationship with LP&L Ops. QA in expediting SCD completions.
- 4.7 Ready retrievability/traceability of previously identified QA concerns are not available.
- 4.8 Penetration seals, which are non-existent, "Bought-off" by B&B and Ebasco
- 4.9 QA Audits
 - a - Ebasco audits lack supporting documentation
 - b - Ebasco audit reports routed in violation of procedures

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- 4.10 Ebasco QAE directs QC to remove HOLD Tag when problem is not corrected.
- 4.11 Examples of specific concerns:
- a) Cabinet 39, RAB-35, Iso 153T-222A
Support #3 removed; tubing out of track
 - b) SI Tank 1A, RCB, 72'-82', PT-SI-0313, PT-SI-0311
Tube clamp halves missing
 - c) RAB +46, Control Room E HVAC Unit
Check for leaks and writing on supports to unit
- 4.12 Ebasco's lack of timely responses to questions, leads to LP&L being late in reporting deficiencies to NRC.
- 4.13 Ebasco QAE's not allowed to issue NCR's unless prior approval given by Site Supervisor or Lead QA Engineer.
- 4.14 N-5 forms should be reviewed for unresolved NCR adequacy.

To have the responses available for release to the individuals, it is important for us to have the answers on or before January 30, 1984.

Upon completion of our reviews, there may be additional concerns addressed to you. Thanks for your cooperation in this matter.

TFG:RGB:grf

cc: L. L. Bass
~~R. G. Bennett~~
Nuclear Records (2)
J. M. Guillot
Central Records
LP&L Site QA File



LOUISIANA
POWER & LIGHT

142 DELAPONDE STREET • PO BOX 5008
NEW ORLEANS, LOUISIANA 70174-5008 • (504) 366-2345

January 17, 1984

W3K-84- 0108
Q-3-A35.01
Response Req'd: Yes
By: January 30, 1984

TO: A. M. Cutrona
Manager, Site Quality Program
Ebasco Services, Inc.

FROM: *T. F. Gerrets*
T. F. Gerrets
Corporate QA Manager

SUBJECT: Waterford SES Unit 3
Quality Concerns

Listed below is a compilation of the concerns expressed by various individuals during the interview sessions conducted by LP&L QA. The concerns, as stated, are generic, therefore, it may be a mechanism is already in effect to cover the concern.

- 3.1 Personnel initiating deficiency document is not made cognizant of disposition of deficiency. (Note: This concern was expressed by numerous interviewees).
- 3.2 Verbal resistance (by mgmt) in initiating NCR's. (QAIRG, Mercury review)
- 3.3 NCR's improperly closed.
(W3-7332,
- 3.4 Documentation reviewers unqualified
- 3.5 Lack of Mercury documentation supporting tension tests for bolting
- 3.6 T-B QC inspector qualification program weak and ill-defined;
Mercury QA Inspector Qualification Program weak and ill-defined
- 3.7 No QC inspection on east wall of RAB +46 hall by coatings contractor.
- 3.8 T-B weld rod records (bulk documentation) identifies welders to weld rods and location. Is this bulk documentation to be supplied to LP&L and is it "married" to other documentation.

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- 3.9 Cable splices in rotor potheads too tight, could cause excessive vibration and stress.
- 3.10 Radflex sealant should be checked for shrinkage and/or voids.
- 3.11 Improper closure of NCR's - W3-6486 and W3-6623, W3-F-3-123
- 3.12 Tubing isometrics poor quality; illegible entries, dimensions, etc. (example 1645 001A, SUS 39)
- 3.13 During construction certain design changes (J. A. Jones) were approved via speedy-memos. No ESSE review verification.
- 3.14 No signature list to verify authenticity of signature; (QAIRG documentation reviews, T-B and Mercury)
- 3.15 Supports shown installed on F&M installation list; no supporting documentation.
- 3.16 NCR W3-2008 closed 6/25/80 by individual hired in 1982.
- 3.17 NCR's being reopened due to inadequate documentation to support initial closure.
- 3.18 Need additional hardware review of contractor work by LP&L and Ebasco.
- 3.19 Additional indoctrination, training in field orientation.
- 3.20 Review/evaluate service forms (ASP-IV-48) to verify warranty not violated
- 3.21 "Breaking-up" work packages (EC) creates problem of identification and "marrying", at later date
- 3.22 Lack of day-to-day supervision (Sline)
- 3.23 Column 8, Level +21, (10" line to SG) second dry shield wall has rebar set too far (1') in concrete.
- 3.24
 - a) Inadequate grouting of pump base plates; TGB, Pumps 9A, 9D or 9E.
 - b) Inadequate grouting of pump base plates; RAB, Pumps 3N & 3A, 10A & 10N, - 35 level
- 3.25 Quality of inspections, products, operations of concrete batch plant questionable.

To have the responses available for release to the individuals, it is important for us to have the answers on or before January 30, 1984.

Upon completion of our reviews, there may be additional concerns addressed to you. Thanks for your cooperation in this matter.

TFG/RGB/grf

cc: L. L. Bass

~~R. G. Bennett~~

Nuclear Records (2)

J. M. Guillot

Central Records

LP&L Site QA File

EBASCO SERVICES INCORPORATED

EBASCO

P.O. Box 70
Killona, Louisiana 70066-0070

W3QA-27570
January 25, 1984

Mr. T. F. Gerrets
Quality Assurance Manager
Louisiana Power & Light Company
142 Delaronde Street
New Orleans, Louisiana 70172

LOUISIANA POWER & LIGHT COMPANY
WATERFORD STEAM ELECTRIC STATION
1984 - 1165 MW INSTALLATION - UNIT NO. 3
EBASCO QUALITY CONCERNS



Reference: LP&L letter W3K-84-0108

Dear Mr. Gerrets:

We acknowledge the above referenced LP&L transmittal letter W3K-84-0108 listing the compilation of concerns expressed during the interview session conducted by LP&L Q.A. Our response to these concerns are as follows:

Concern: 3.1 Personnel initiating deficiency document is not made cognizant of disposition of deficiency. (Note: This concern was expressed by numerous interviewees).

Response: Several review groups were set up with resolution and closure separate and distinct from the review. This was done to best utilize the talents of the individuals in the different phases of records review. In the resolution area the responsibility was to assure that adequate training was accomplished based on NCR resolution, meeting agreements, letters of clarification etc. It was also used as a tool for the review group Supervisors to check the quality of the reviews being performed prior to submittal of the packages to the client. It is option of the Q.A./Q.C. person to pursue the resolution of the deficiency as they so desire.

Concern: 3.2 Verbal resistance (by mgmt) in initiating NCR's. (QAIRG, Mercury review)

Response: The resistance is more a "do your homework" situation. Many recommendations for NCR's are for problems already addressed with corrective action being implemented for problems already resolved. The concern also exists that the NCR is recommended however, further review of the problem indicates that there isn't a non-conformance.

Concern: 3.3 NCR's improperly closed. (W3-7332,

Response: It is felt by both Q.A. and Construction Engineering that NCR-W3-7332 has been properly dispositioned and closed in compliance with Procedure ASP-III-7, "Processing of Nonconformances and Audits".

F01A-84-507

Concern: 3.4 Documentation reviewers unqualified.

Response: This situation was addressed recently in Ebasco Audit Report number RCB/AEZ-83-10-1 and resolved. It should be noted that the site training program for records review (QAI-14) was not mandatory until August 1, 1983.

Concern: 3.5 Lack of Mercury documentation supporting tension tests for bolting.

Response: Installation - Construction Q.A. Records will be reviewed for completeness, accuracy, proper form, traceability, legibility, authenticity and for changes and/or supplements. Deficiencies which cannot be resolved prior to turnover shall be documented on form QAI-9.2 "Construction - Installation Records Deficiency" report and shall be further processed as dictated by Procedure QAI No. 9.

Concern: 3.6 T-B Q.C. inspector qualification program weak and ill-defined;
Mercury Q.A. Inspector Qualification Program weak and ill-defined.

Response: The T-B and Mercury Q.C. Inspector Qualification Program has had several Ebasco audits performed over the course of their construction activities. The numbers listed below represent the Ebasco audits performed on indoctrination and training: HS-79-9-5 (T-B); HS-79-1-3 (T-B); NE-79-2-5 (Mercury); DH-79-3-3 (T-B); CEB-82-8-1 (T-B); CEB-82-11-1 (Mercury); NE-80-9-5 (T-B); NB-79-3-1 (Mercury).

Additionally, T-B has performed the following audits on the Site Q.A./Q.C. organization: W3-84-6-81, W3-97-12-81, W3-47-5-79, W3-42-3-79, W3-112-1-83.

Concern: 3.7 No Q.C. inspection on east wall of RAB +46 hall by coatings contractor.

Response: Per conversation with the Sline contractor this wall has not been coated. This was verified informally by the Ebasco Q.A. Surveillance Group. This location is on drawing G773 S02 of the Room Finishing Schedule and does not require coating.

Concern: 3.8 T-B weld rod records (bulk documentation) identified welders to weld rods and location. Is this bulk documentation to be supplied to LP&L and is it "married" to other documentation.

Response: All T-B records will be turned over to the client. Ebasco Q.A. will not marry this documentation. The weld rod used on site was procured with few exceptions with Material Test Reports therefore, the weld rod used is acceptable. Additionally, the welders qualification records were reviewed by Q.A.I.R.G. and are acceptable.

Concern: 3.9 Cable splices in motor potheads too tight, could cause excessive vibration and stress.

Response: Due to the vagueness of the concern, we are unable to adequately address an appropriate response.

Concern: 3.10 Radflex sealant should be checked for shrinkage and/or voids.

Response: As part of normal B&B Installation and Inspection Procedures, all radflex penetrations are allowed to stand a minimum of 24 hours after installation before being Q.C. inspected. As part of this inspection all penetrations are checked for voids and settlement. If a fill of less than 100% is found, the penetration requires "Topping Off", again per B&B's Procedures.

B&B Houston recently issued a technical bulletin (TB-101-1030) to all projects noting... "under certain conditions of temperature during the fill, or where heat was used on the material during installation, a slight shrinkage of the fill may occur. Most notably, when temperatures of material at time of installation is greater than 20°F from ambient temperature after cure, a small space, ... may occur."

B&B is presently inspecting all wall type radflex penetrations for this condition.

Concern: 3.11 Improper closure of NCR's - W3-6486 and W3-6623, W3-F-3-123.

Response: Ebasco NCR's W3-6486 and W3-6623 when closed did not fully satisfy the requirements for closing. On January 5, 1984 NCR-W3-7511 was written to further address the nonconforming conditions of NCR's W3-6486 and W3-6623. It is anticipated that sufficient information/Q.A. records can be obtained to satisfy the closing of NCR W3-7511.

Concern: 3.12 Tubing isometrics poor quality; illegible entries, dimensions, etc. (example 1645 001A, SUS 39)

Response: R. W. Greenwell, Ebasco, has initiated a review and update of Mercury drawings along with incorporation of all outstanding red-lines. This should resolve all open items and concerns.

Concern: 3.13 During construction certain design changes (J. A. Jones) were approved via speedy-memos. No ESSE review verification.

Response: Examples of speedy memos were submitted to ESSE for their review for validity to design change. This is being reviewed and a response is expected by 2-17-83.

Concern: 3.14 No signature list to verify authenticity of signature; (QAIRG documentation reviews, T-B and Merucry)

Response: There is no requirement for such lists.

Concern: 3.15 Supports shown installed on F&M installation list; no supporting documentation.

Response: Ebasco did not assign numbers for F&M installed non-engineered conduit supports. In order to issue the Specification - Drawing List, Office Engineering requested this input from F&M. F&M supplied an unofficial uncontrolled list of numbers from their logs. Some numbers given were not installed or no longer installed. Supports were "bulk-fabricated" by F&M which is another reason that numbers given were not available in the field.

Concern: 3.16 NCR-W3-2008 closed 6-25-80 by individual hired in 1982.

Response: Nonconformance Report W3-2008 has been re-opened and the signature, of the original closing QAE, re-analyzed as to its' validity. The conclusion of the QAE re-opening the NCR is that the signature is valid and has been further documented by adding attachments 3 and 4 to the NCR.

Concern: 3.17 NCR's being reopened due to inadequate documentation to support initial closure.

Response: An Ebasco Q.A. Audit/Surveillance is presently in progress to determine the adequacy of NCR closures. Those NCR's which are determined not to be in compliance with existing procedures will be re-evaluated on a case-by-case basis to determine what, if any, additional action is required.

Concern: 3.18 Need additional hardware review of contractor work by LP&L and Ebasco.

Response: Each contractor performing safety-related work at Waterford has an approved Q.A./Q.C. program including both Ebasco and LP&L. Additionally, a surveillance program exists within Ebasco Q.A..

Prior to acceptance of a turnover from Ebasco Construction to LP&L Start-Up, LP&L Q.A. does a hardware and software audit and the system is walked down by the contractor, Ebasco and LP&L Start-Up. At the time of system transfer, LP&L Q.A. does another hardware and software audit and a 14 day walkdown by Ebasco and LP&L - Plant Staff is performed. It appears the number of walkdowns performed is sufficient.

Concern: 3.19 Additional indoctrination, training in field orientation.

Response: New employee orientation is a procedural requirements of ASP-I-3. Deficiencies identified against this requirement were identified in the last Q.A. Corporate Audit WT-83-1. Corrective action for this finding include the identification of personnel not receiving orientation. (This has been completed by Office Engineering and Site Training), scheduling these personnel for training, and setting up a system to assign and teach new hires through the orientation on their date of hire.

Scheduling of make-up training is anticipated for the weeks of January 30 and February 6, 1984.

Concern: 3.20 Review/evaluate service forms (ASP-IV-48) to verify warranty not violated.

Response: Engineering is responsible for assuring that commercial aspects of the plant are not violated. This applies to any construction activity performed including service forms.

Concern: 3.21 "Breaking-up" work packages (EC) creates problem of identification and "Marrying", at later date.

Response: This is a problem that has been addressed by Ebasco Q.C. inspectors and records review personnel several times over the last year. At this time if a package is broken up or "recycled" for any reason Construction Engineering is required to sub-number the package to uniquely identify it.

Concern: 3.22 Lack of day-to-day supervision (Sline)

Response: This problem has been resolved as all of the Ebasco personnel reviewing Sline documentation are located in one area with a full time supervisor assigned to the group.

Concern: 3.23 Column 8, Level +21, (10" line to SG) secondary shield wall has rebar set too far (1') in concrete.

Response: A recent re-inspection of rebar within the secondary shield indicates the location and spacing to be within acceptable limits.

Concern: 3.24 a) Inadequate grouting of pump base plates; TGB, Pumps 9A, 9D or 9E.
b) Inadequate grouting of pump base plates; RAB, Pumps 3N and 3A, 10A and 10N, -35 level.

Response: A re-inspection of subject pump base plates reveal the grouting to be acceptable, no further action is required nor anticipated.

Ebasco Quality Concerns (continued)

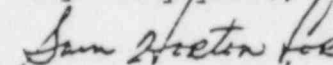
Page 6

Concern: 3.25 Quality of inspections, products, operations of concrete batch plant questionable.

Response: Batch Plant materials/operations have been inspected per the requirements of Ebasco Procedures WQC-1 "Control of Receiving, Handling and Storage of Material and Soils", WQC-120 "Batch Plant Inspection", and GEO Procedure QA12-6752, "Field and Laboratory Inspection and Testing of Concrete". Periodic Quality Assurance Audits have also been performed to ensure the Quality Control Program has been adhered to.

If you have any questions or comments, please contact Sam Horton at ext. 488.

Very truly yours,



A. M. Cutrona

Manager, Site Quality Program

AMC:SH:cmg

cc: L. L. Bass
R. Bennett
W3QA File

EBASCO SERVICES INCORPORATED

EBASCO

P.O. Box 70
Killona, Louisiana 70066-0070

W3QA-27567
January 25, 1984

Mr. T. F. Gerrets
Quality Assurance Manager
Louisiana Power & Light Company
142 Delaronde Street
New Orleans, Louisiana 70172

LOUISIANA POWER & LIGHT COMPANY
WATERFORD STEAM ELECTRIC STATION
1984 - 1165 MW INSTALLATION - UNIT NO. 3
EBASCO QUALITY CONCERNS

Reference: LP&L letter W3K-84-0109

Dear Mr. Gerrets:

We acknowledge the above referenced LP&L transmittal letter W3K-84-0109 listing the compilation on concerns expressed during the interview session conducted by LP&L Q.A. Our response to these concerns are as follows:

Concern: 4.1 Welding done on instrument lines without purging.

Response: Purging is not a requirement of welding all Mercury instrument lines. It is required when indicated by the applicable Welding Procedure Specification, and is optional on others. A more detailed response is not possible without specifically identifying the lines involved, or identifying the Welding Procedure Specification used.

Concern: 4.2 "Sugaring" on inside of tubing (instrument lines could cause flow restrictions.

Response: "Sugaring" is a result of inadequate purging, however without specific identifying information, no further action is anticipated.

Concern: 4.3 Procedural revisions, Ebasco, not being supplied to field personnel.

Response: It is the responsibility of each department head/supervisor to assure that all personnel in his charge are using the latest revision of any controlled document. Specific concerns should be brought to the attention of the Ebasco Document Control Supervisor in order that a survey may be performed or to the Ebasco Q.A. Site Supervisor for appropriate corrective action.

FOIA 84-507

Concern: 4.4 Prior to June '83, T-B had no formal training program for record reviewers.

Response: Until that time it was not a part of the approved program in effect, however, all contractor records were reviewed by Ebasco Q.A.I.R.G. and audited by LP&L Q.A. therefore assuring completeness.

Concern: 4.5 Qualifications of certain key individuals within Ebasco Q.A. organization are questionable.

Response: Due to the vagueness and non-specific information available, we are unable to address this concern adequately.

Concern: 4.6 Need to establish better working relationship with LP&L Ops. Q.A. in expediting SCD completions.

Response: Ebasco and LP&L personnel responsible for SCD reporting have determined that a new QAI Procedure is required to aid in the processing and coordinating of SCD's. The Procedure will be issued in the near future. Also, it was agreed that reportable NCR's will be processed in a more expeditious manner in order to speed up the entire process.

Concern: 4.7 Ready retrievability/traceability of previously identified Q.A. concerns are not available.

Response: Correct Manual indexing and filing causes the fields of input to be limited. Microfilming being done by LP&L will eliminate this problem.

Concern: 4.8 Penetration seals, which are non-existent, "Bought-off" by B&B and Ebasco.

Response: Based on the program in effect Ebasco Q.C. is required to inspect and sign off for the installation of B&B penetration seals. Specifics of this concern should be identified to Ebasco Q.A. for further handling. (See attached B&B form #QC-3)

Concern: 4.9 Q.A. Audits

- a - Ebasco audits lack supporting documentation.
- b - Ebasco audit report routed in violation of procedures.

Response: A) Ebasco audits are performed in accordance with Procedure QAS-2 and QAS-3. Verification of corrective action is performed by the appropriate auditor who documents his verification and signs and dates the specific Quality Finding Report, indicating his acceptance of the corrective action and thereby closes the audit finding.

- B) At the time these concerns were stated, there was a deficiency in distribution due to title changes. However, this deficiency has been corrected and are now processed in accordance with Ebasco Site Quality Assurance Procedure QAS-2, QAS-3 and the ASME Manual.

Concern: 4.10 Ebasco QAE directs Q.C. to remove HOLD Tag when problem is not corrected.

Response: It is occasionally an acceptable practice to remove "HOLD" tags even though the hardware has not been corrected. Engineering may evaluate a "Nonconforming" condition to be used "As-is" with no required rework.

Concern: 4.11 Examples of specific concerns:

- a) Cabinet 39, RAB-35, Iso 153T-222A
Support #3 removed; tubing out of track
- b) SI Tank 1A, RCB, 72'-82', PT-SI-0313, PT-SI-0311
Tube clamp halves missing
- c) RAB +46, Control Room E HVAC Unit
Check for leaks and writing on supports to unit

Response: Ebasco agrees with the concerns as written for items A & B. ECI Q.C. will be notified to review the subject hardware and generate an NCR if applicable.

Insufficient identifying information supplied to adequately prepare a response for item "c".

Concern: 4.12 Ebasco's lack of timely responses to questions, leads to LP&L being late in reporting deficiencies to NCR.

Response: Ebasco has instructed applicable Quality Assurance Personnel to provide answers to questions from LP&L in a more timely manner.

Concern: 4.13 Ebasco QAE's not allowed to issue NCR's unless prior approval given by Site Supervisor or Lead Q.A. Engineer.

Response: This concern is correct as written; Ebasco Q.A. policy is that each NCR prior to issuance will be reviewed and approved by either the Q.A. Site Supervisor or the Lead Engineer. This is to preclude semantic problems with the NCR's and to also preclude inaccurate NCR's from being issued.

Ebasco Quality Concerns (continued)
Page 3

Concern: 4.14 N-5 forms should be reviewed for unresolved NCR adequacy.

Response: All Nonconformance Reports were closed prior to the ANI signing the Data Report and stamping of the Code Plate, with the exception of certain generic NCR's which did not impact the N-5's.

If you have any questions or comments, please contact S. Horton, Ebasco Q.A. Site Supervisor at ext. 488.

Very truly yours,

Sam Horton Lee

A. M. Cutrona
Manager, Site Quality Program

AMC:SH:cmg

cc: L. Bass
R. Bennett
W3QA File



LOUISIANA
POWER & LIGHT / INTER-OFFICE CORRESPONDENCE

January 30, 1984

W3M84- 0035

TO: Distribution

FROM: R.P. Barkhurst

SUBJECT: Supplemental Attachments to
Weekly Area Walkdowns

REFERENCE: Memo W3M84-0017 dated January 13, 1984

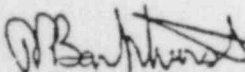
FILE COPY

Forwarded for your information and record's update per above reference memo is the following:

 x Attachment No. 1 Area Responsibilities
Supplement No. 1 Date 01/23/84

 Attachment No. 1A Area Diagrams
Supplement No. Date

 Attachment No. 2 Housekeeping Guidelines For Routine Area Walkdowns
Supplement No. Date


R.P. Barkhurst

RFB/RAL:sc

Distribution: D.E. Dobson, N.S. Carns, M.J. Wise, J. Chadelaine, L.F. Storz,
S.A. Alleman, O.D. Hayes, J.R. McGaha, P.V. Prasankumar, J. Woods,
M. Woodard, M.P. Flasch, A. Pastor, W. Henne, F. Englebracht,
C. Kennedy, R. Lailheugue, R. Kenning, D. Packer, H.A. Canavier,
T.C. Payne, R. E. Sproles, R. Booth, L. Simon, V. McAdams,
K.L. LeBlanc, D. Haase, A. Holder

cc: R.S. Leddick, R. Milhiser, R. Marshall, F.J. Drummond, W. Morgan, T. Rucci,
R. Burski, O. Tucker

FOIA-84-507

AREA RESPONSIBILITIESDate 1/23/84NOTES:

Temp Area Resp - The department responsible for area housekeeping until Area is transferred to Plant Staff.

Temp Indv Resp - The individual responsible for area housekeeping until Area is transferred to Plant Staff.

Transfer Date - The date LP&L accepts the area.

Clean Resp. - The department responsible for area cleaning.

Area Resp. - The department responsible for area activities.

CHEM - Chemistry

HP - Health Physics

OPS - Operations

RW - Radwaste

SS - Special Services

MD - Maintenance Department

ME - Electrical Maintenance

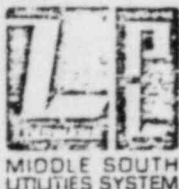
MI - I&C Maintenance

MM - Mechanical Maintenance

Area No.	Description	Transfer Date	Clean Resp	Area Resp	Temp Area Resp	Temp Indv Resp
19-02	Computer Battery Rm	09/02/83	SS	ME	N/A	----
19-55	Fuel Oil Storage Tank Area	01/17/84	SS	CHEM	N/A	----
19-05	Fire Pump House	01/19/84	SS	OPS	N/A	----
19-18	Turbine Building Operator Shack and Bathroom only.	01/31/84	SS	OPS	OPS	Hoffpauir
19-38	RAB H&V Equipment	01/31/84	RW	RW	ME	Pecaut
19-10	Control Room	01/31/84	SS	OPS	OPS	Bourgeois
				MI	MI	Matherne
19-01	Battery Room	01/31/84	SS	ME	ME	Campbell
19-14	Battery Room	01/31/84	SS	ME	ME	Campbell
19-54	Fire Water Storage Tank	01/31/84	SS	OPS	OPS	Ellard

Area No.	Description	Transfer Date	UNT-7-006		Temp Area Resp	Temp Area Resp	Temp Indv Resp
			Clean Resp	Area Resp			
19-39	Rad Monitoring	01/31/84	RW	HP	HP	HP	Hoel
19-35	Elec Penet Area	01/31/84	SS	ME	ME	ME	Pecaut
19-32	Switchgear Room	01/31/84	SS	ME	ME	ME	Pecaut
19-07	Service Building	01/31/84	SS	MD	MD	MD	Kennedy
19-19	Refueling Water Storage Pool	01/31/84	RW	RW	RW	RW	Moe
19-27	Valve Enclosure	01/31/84	RW	RW	OPS	OPS	Olaon
19-22	Pump Rooms	01/31/84	RW	RW	MM	MM	Kennedy
19-23	Boron Management Area	01/31/84	RW	RW	HP	HP	Hoel
19-21	HPSI, LPSI, CS Pump Rooms	01/31/84	RW	RW	MM	MM	Kennedy
19-08	Fuel Handling Bldg	01/31/84	RW	RW	MD	MD	Legere
19-20	Waste Tank Area	01/31/84	RW	RW	RW	RW	Reider
19-33	Radwaste Handling	01/31/84	RW	RW	RW	RW	Stevens
19-29	Demineralizer Area	01/31/84	RW	RW	HP	HP	Hoel
19-30	Boric Acid Concentrator Area	01/31/84	RW	RW	HP	HP	Hoel
19-52	Primary Water Storage Tank	01/31/84	RW	CHEM	OPS	OPS	Ellard
19-41	CTMT -11	01/31/84	RW	RW	MM	MM	Kennedy
19-42	CTMT -4	01/31/84	RW	RW	MM	MM	Kennedy
19-43	CTMT +21	01/31/84	RW	RW	MI	MI	Martinez
19-44	CTMT +46	01/31/84	RW	RW	MI	MI	Martinez
19-48	Dome and Polar Crane Area	01/31/84	RW	RW	MM	MM	Kennedy
19-31	RAB Vault Area	01/31/84	SS	ME	ME	ME	Campbell
19-34	Diesel Generator and CC Area	01/31/84	RW	RW	OPS	OPS	Smith & Jones
19-57	RAB Penthouse	01/31/84	SS	MM	OPS	OPS	Olson
19-13	Communication Equipment Area	02/29/84	SS	ME	ME	ME	Campbell
19-09	Health Physics Access Area	02/29/84	RW	HP	HP	HP	Funk
			SS	CHEM	CHEM	CHEM	Llewellyn & Dolese
19-50	Low Level Radwaste Building	02/29/84	RW	RW	RW	RW	Moe
19-51	Solidification Building	02/29/84	RW	RW	RW	RW	Moe
19-06	Chiller Building	03/15/84	SS	ME	ME	ME	Pecaut
				MM	MM	MM	Kennedy
19-49	Met Towers	03/15/84	SS	MI	MI	MI	Martinez
19-40	RAB Roof	03/15/84	SS	MD	MM	MM	Kennedy
19-24	RAB Vault Area	03/15/84	RW	RW	ME	ME	Pecaut
19-28	CTMT Access - RAB	03/15/84	RW	RW	RW	RW	Reider
19-25	Cooling Towers	03/15/84	SS	MM	OPS	OPS	T.D. Brown
19-26	Cooling Towers	03/15/84	SS	MM	OPS	OPS	Davie

Area No.	Description	Transfer Date	Clean Resp	UNT-7-006 Area Resp	Temp Area Resp	Temp Indv Resp
19-36	Decon Facility	03/15/84	RW	MD	MM	Kennedy
19-45	CTMT Annulus	03/15/84	RW	MD	MI	Martinez
19-53	Condensate Storage Tank Area	03/15/84	SS	CHEM	OPS	Ellard
19-47	Discharge Structure	04/14/84	SS	CPS	OPS	McCann
19-18	Turbine Building	04/14/84	SS	OPS	OPS	Hoffpauir & Pendergrass
19-46	Intake Structure	04/14/84	SS	OPS	OPS	McCann
19-04	Water Treatment Building	04/14/84	SS	CHEM	CHEM	Llewellyn & Dolese
19-37	RAB Access Area	04/14/84	RW	RW	OPS	Bowers
19-56	Condensate Polishing Building	10/31/84	SS	CHEM	MD	Kennedy



LOUISIANA
POWER & LIGHT / INTER-OFFICE CORRESPONDENCE

February 11, 1984

W3Q84-0010

TO: T.F. Gerrets

FROM: R.P. Barkhurst

SUBJECT: Waterford 3 Quality Concerns

REFERENCE: LP&L Letter W3K84-0069 dated January 12, 1984

The following is our response to quality concerns noted during interviews with staff personnel:

- 2.1 Startup personnel reviews startup activities rather than an independent quality review.

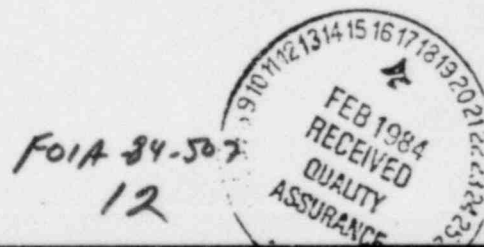
Response - Startup personnel review procedures designed to control startup activities as required by the Startup Administrative Procedures (SAPs). The Joint Test Group (JTG) performs a final review of startup procedures. When the review is complete and all review comments have been satisfied, the JTG recommends Lead Startup Engineer (LSE) approval.

In addition to the JTG review and in accordance with the requirements of the SAPs, the Plant Quality Group must perform an independent quality review of all startup test procedures and comments must be resolved prior to LSE approval. The Quality Review is accomplished in accordance with QP-1-003, Quality Review of Procedures and Work Packages.

- 2.2 Procedures are approved without field testing or walk-downs for adequacy.

Response - There is no requirement for field testing or walk-down of procedures prior to use. However, as directed by the Plant Manager, most Plant Operating Manual (POM) Surveillance Procedures related to Operations and Maintenance must receive a walk-down prior to Plant Manager approval.

In order to accomplish the walk-down or field testing of a procedure, a CIWA must be generated in accordance with UNT-5-002, "Condition Identification and Work Authorization". This CIWA controls the walk-down activity.



2.3 Deleting of QC witness points could affect QC effectiveness.

Response - As stated in LP&L letter W3Q83-0222 dated December 20, 1983, the use of the QC "witness" point is being discontinued and the procedural steps requiring inspection are to be identified by an inspection "hold" point.

The inspection "hold" point is a point or step in an activity that requires an examination or measurement to assure compliance with stated quality requirements.

A "hold" point will not necessarily be added to replace each "witness" point deleted.

Inspection and examination of activities at points other than the "hold" point shall be accomplished by surveillances. Surveillances coincide with the activity to be surveilled and all or part of any activity may be surveilled.

The determinations made and addressed in W3Q83-0222 are being incorporated into procedure QP-010-001, Inspection, and should enhance the Plant Quality Program by providing flexibility in the performance of inspection.

2.4 Use of hold points rather than witness points slows down testing.

Response - When "hold" points are established only at those procedural steps requiring inspection and when surveillances are used as noted in our response to 2.3 above, then the work or testing process will not be impeded.

2.5 Housekeeping standards are not adhered to; follow-up actions are poor.

Response - Plant Staff has developed a plant wide housekeeping plan. This plan assigns responsibilities by areas and requires a daily area walk-down to assure compliance with housekeeping requirements. As areas are transferred to Plant Staff, this plan will be enforced.

Plant Quality will provide inspection and feedback to management as to the effectiveness of the housekeeping program.

Attached are LP&L letters W3M84-0017 dated January 17, 1984 and W3M84-0022 dated January 16, 1984 describing Plant Staff housekeeping actions.

2.6 Lack of procedures hinder effective QC Program; (refrigeration, lube samples).

Response - It is not possible to determine from this comment exactly what the problem is.

2.7 CIWA control and completion process is inadequate.

Response - Needs clarification of SAP-08 on Plant CIWA Procedure?
The procedure for CIWA control and completion process is adequate.

The Plant Quality Group has reviewed the CIWA procedure and all review comments have been resolved to the reviewers satisfaction.

2.7 Response (continued)

All changes or revisions to the CIWA are reviewed by Plant Quality prior to implementation.

Personnel problems, such as failure to follow procedure, could be misconstrued as procedural inadequacy. The Quality Notice provides a mechanism to document and correct procedural violations. In addition, any member of Plant Staff could and should submit recommended changes to CIWA procedure as he or she deems appropriate.

2.8 Startup places higher priority on test completion than on long-term quality.

Response - Controls are established to ensure adequate control over Startup work.

The Joint Test Group, made up of Startup, Plant Staff and Quality Assurance personnel, reviews all testing for adequacy prior to submital of a system to Plant Staff.

System Transfer from Startup to Plant Staff occurs only after a complete review by Plant Staff to assure the system is acceptable.

2.9 Instrument line problems have not been fully addressed.

Response - Known instrument line problems are being addressed. Also, it is each employee's responsibility to identify problems he/she sees in the plant.

Startup should provide any additional response required to satisfy this concern.

2.10 Letters being used in lieu of procedures.

Response - Often letters or departmental directives are issued for clarification of a procedure. When procedures are revised, the information in the letter or directive is included as a part of the revised procedure as appropriate.

Instructions given in a letter or directive do not change or alter the intent of the controlling procedure.

It is the intent to utilize letters where POM procedures are called for by STS. If there are any specific cases where you think this might be so, please advise.

2.11 Emergency Diesel Generator test personnel possibly unqualified.

Response - Startup should answer this, not Plant Staff.

2.12 QC Inspector determines points of inspection which should be done by qualified engineers.

Response - The author of a work package or procedure should include inspection requests. It is the Quality Reviewer's responsibility to assure inclusion of inspection points. Both parties are equally responsible in assuring that inspection is addressed in procedures and work plans. There is no requirement to use engineers to specify hold points in work packages.

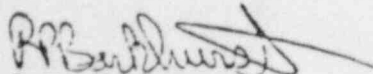
2.13 QC not involved enough in conducting dispositions of nonconformances.

Response - QC does not currently evaluate dispositions of nonconformances. QC's current responsibility is to:

- a) Identify Quality Problems;
- b) Initiate, recommend or provide problem solutions through designated channels; and
- c) Verify implementation of solutions

This suggestion has merit, and Plant Management is taking steps to formally include Plant Quality in final resolution of Nonconformances.

Should you need any further information concerning these items, please contact me.


R.P. Barkhurst

RPB/JW/erb

cc: R.S. Leddick, L.L. Bass, S. Lockhart, Central Records

NCR TRANSMITTAL/RECEIPT ACKNOWLEDGEMENT

DATE: 2-23-84

TO: J. Brunori
Sam Horton
FROM: S. Borton***NOTE: REFER TO ATTACHMENT #2.
N. Goodrich

Attached is NCR-W3- 7579 , SUS 25-9 , which is being transmitted to you for (*) 3 . As confirmed by your signature below, you are now responsible for the further processing of this NCR and for "hand delivering" it to the next department/organization upon completion of your action.

A copy of this transmittal is being taken to the NCR Tracking Group for data input to the tracking system. Please provide your best estimate for completion of your action on this NCR so that this information can also be added to the tracking data base.

Estimated action completion date: _____

Received by (Print): _____

Signature: _____ Date: _____

TRACKING GROUP ACKNOWLEDGEMENT

The above referenced copies have been received for data input by:

Name (Print): _____

Signature: _____ Date: _____

- (*) 1. Recommended Disposition
2. Evaluation of Disposition
3. Corrective Action
4. Add'l Information
5. Add'l Corrective Action
6. Revised Recommended Disposition
7. Revised Evaluation of Disposition

cc: (w/attachment)
QAS File
D. Findley
L. Bass

Sign:

Form Revised 1/18/84

FOIA-84-507
15

F-102



Distribution
White - PCAB or Site QA Supervisor
Yellow - Organization recommending disposition
Pink - Initiator of NCR

45-7579

CTIONS: (See back of form) SUS: 25-9 Trend Code: 9000 01.30

OR PROJECT (2)

Louisiana Power & Light Company - Waterford III

DRAWING NO./SPEC NO. 13
ASME III CLASS III

SUPPLIER, CONSTRUCTION OR CONTRACTOR (4)

P.O. NO. 15

Mercury Company of Norwood, Inc.

WB-NY-15

DESCRIPTION OF COMPONENT, PART OR SYSTEM (8)

OCR #1101 LINE #PS-NG-0933BS

I. DESCRIPTION OF NONCONFORMANCE (7) (Items Involved, Specification, Code or Standard to Which Items Do Not Conform, Submit Sketch if Applicable)

During review of OCR #1101 the following discrepancy was revealed: FW#1 is a 1" x 1/2" s/s adapter welded to a 1" c/s valve, the filler material, type and heat number for this weld is correct, but WPS 'D' was used, the correct WPS is 'G'. No FWA exists in the vault that could possibly clarify the documentation, therefore, it is indeterminate as to whether the correct WPS or filler material and type was used. This is in violation of MCP-2100.

ITEM: 0001

NAME AND SIGNATURE OF PERSON REPORTING NONCONFORMANCE (8)

W. Pepper/J. Brunori

TITLE/COMPANY

EC/OARC - Supervisor

DATE (9)

2/2/84

II. RECOMMENDED DISPOSITION (10) (Submit Sketch if Applicable)

SEE ATTACHMENT #2 IS E 2-16-84

REPORTABLE	YES	NO
RECORDED	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
INDEXED	<input type="checkbox"/>	<input type="checkbox"/>
FILED BY	MEX 11.37.84	

NAME AND SIGNATURE OF PERSON RECOMMENDING DISPOSITION (11)

W. H. WRIGHT

TITLE/COMPANY

SRV RES I/C ENG TRNG

DATE (12)

2-10-84

III. EVALUATION OF DISPOSITION BY EBASCO, REASON FOR DISPOSITION (13)

Discontinue Attachment #2

IV. CORRECTIVE ACTION (14)

☒ Required

☐ Not Required

NEW 2.17.84

NEW 2.17.84

V. (15) <input checked="" type="checkbox"/> ENGINEERING	<input checked="" type="checkbox"/> QUALITY ASSURANCE	<input type="checkbox"/> CONSTRUCTION	<input type="checkbox"/> OTHER
NAME SIGNATURE <i>[Signature]</i>	NAME SIGNATURE <i>[Signature]</i>	NAME SIGNATURE	NAME SIGNATURE
DATE 2-23-84	DATE 2-23-84	DATE	DATE
<input checked="" type="checkbox"/> ACCEPTED <input type="checkbox"/> REJECTED	<input checked="" type="checkbox"/> ACCEPTED <input type="checkbox"/> REJECTED	<input type="checkbox"/> ACCEPTED <input type="checkbox"/> REJECTED	<input type="checkbox"/> ACCEPTED <input type="checkbox"/> REJECTED
<input type="checkbox"/> ACCEPTED WITH COMMENTS	<input type="checkbox"/> ACCEPTED WITH COMMENTS	<input type="checkbox"/> ACCEPTED WITH COMMENTS	<input type="checkbox"/> ACCEPTED WITH COMMENTS

VI. VERIFICATION OF DISPOSITION

☒ REQUIRED

☐ NOT REQUIRED (16)

EBASCO SERVICES INCORPORATED

BY A. FASID DATE 2-16-84

SHEET 1 OF 2

CHKD. BY _____ DATE _____

DPS NO. _____ DEPT. NO. _____

CLIENT WPS

PROJECT WATERFORD UNIT NO. 3

SUBJECT NLR W 3-7579 ATTACHMENT # 2

BY CHECKING THE FILLER METAL WITHDRAWAL SHEET
IT APPEARS THAT WELDER M-214 HAS WELDED INSTRUMENTS
PS-NG-C943BS AND PS-NG-C933BS ON THE SAME DATE
(9-22-82) BY USING WELDING PROCEDURE TYPE "G".
NO FILLER METAL WITHDRAWAL AUTHORIZATION SHEET
FOR WELD PROC. "D" ON 9-22-82 REGARDING M-214 WAS
FOUND. THEREFORE "QUALITY CONTROL WELD DATA REPORT"
SHALL BE CORRECTED AS TO INDICATE TYPE "G" IN LIEU OF
TYPE "D" UNDER WPS NO.
USE AS IS. WELDING CONCURRENCE IS REQUIRED.

A. J. Smith

ENCL. CONTR. ENCL-R

2-16-84



NCR W3 - 7577
ATTACHMENT # 2
SEP 20 1982

SERIAL NO 34879

MERCURY CO. OF NORWOOD
P.O. Box 782
Killona, LA 70066

MERCURY Q/A
RECORD COPY

FILLER METAL WITHDRAWAL AUTHORIZATION

SYSTEM 25.9 DWG. NO 166-L-104-A

OCR NO. 1101 WELD PROC. G

WORK UNIT/INSTRUMENT NO. 22 NC 0949.25

WELDER'S NAME W. M. P. VANT STAMP NO. m 214

AUTHORIZED SIGNATURE G. BERGERON DATE 9-22-82

FILLER MATERIALS ISSUED:

QUANTITY 8.00 TYPE ER 309 SIZE 3/32

LOT AND HEAT NO. 761795

ISSUED BY R. MARALLO DATE 9-22-82

FILLER MATERIALS RETURNED:

QUANTITY 5 TYPE ER 309 SIZE 3/32

LOT AND HEAT NO. 761795

CHECKED BY C. K. H. H. H. DATE 9-22-82

M.Q.C. REVIEW

9-22-82

MERCURY COMPANY

101 VORWOOD DR
SHELTON, CT 06484

QUALITY CONTROL
WELD DATA REPORT

SHEET 1 OF 1

PROJECT 1 N49720
CONTRACT NO. W3-N49720
PROJECT NAME WATERFORD III
ASME SECTION III, CLASS 3

21 START-UP SYSTEM NO. 25 VISUAL INSPECTION PROCEDURE QCP-3110.5, REV. 3

CABINET NO. N/A PANEL NO. 1111 INSTRUMENT NO. PS-NG-0943 BS

15-000-A REV. 0 DWG. NO. 1111 REV. 0 DWG. NO. N/A REV. 0

ORIG. TO: 404 PROJ. - COPIES TO: ☒ CLIENT ☐ 1111 ☐ N/A

TUBING SIZE OR ID	WELDER ID FIT-UP	WPS NO. FIT-UP	FILLER METAL FIT-UP			FIT-UP INSP/ 3120.3	WELDER ID FINAL	WPS NO. FINAL	FILLER METAL FINAL			FINAL INSP/ 3120.3
			TYPE	SIZE	ET NO				TYPE	SIZE	ET NO	
1/2" APE	M-214	D	ER	3/32	761 795	10-11-82	M-214	D	ER	3/32	761 795	10-11-82
1/2" M-349	M-349	D	ER	1/8	762 549	10-11-82	M-349	D	ER	1/8	762 549	10-11-82
1/2" M-349	M-349	D	ER	1/8	762 549	10-11-82	M-349	D	ER	1/8	762 549	10-11-82
1/2" M-325	M-325	D	ER	1/16	762 549	9-27-82	M-343	D	ER	1/16	762 549	9-27-82
REJECTED	D											
REJECTED	D											
1/2" M-212	M-212	D	ER	1/16	762 549	7-13-81	M-212	D	ER	1/16	762 549	7-13-81
1/2" M-214	M-214	D	ER	1/16	762 549	7-13-81	M-214	D	ER	1/16	762 549	7-13-81
1/2" M-177	M-177	D	ER	1/16	762 549	7-13-81	M-55	A	ER	1/16	762 549	7-13-81
1/2" M-258	M-258	D	ER	1/16	762 549	7-13-81	M-258	D	ER	1/16	762 549	7-13-81
1/2" M-177	M-177	D	ER	1/16	762 549	7-13-81	M-55	A	ER	1/16	762 549	7-13-81
1/2" M-177	M-177	D	ER	1/16	762 549	7-13-81	M-55	A	ER	1/16	762 549	7-13-81
1/2" M-177	M-177	D	ER	1/16	762 549	7-13-81	M-55	A	ER	1/16	762 549	7-13-81
1/2" M-177	M-177	D	ER	1/16	762 549	7-13-81	M-55	A	ER	1/16	762 549	7-13-81

**MERCURY O/A
RECORD CO.**

REJECTED WELDS. INDICATE LOCATION.
AND REASON FOR REJECTION.

8-13 PER EL #5 DEN 1140-K-232 RA
PT 13441 ACC. WELD PREP 3-80 1171 9-14-82
9-27-82

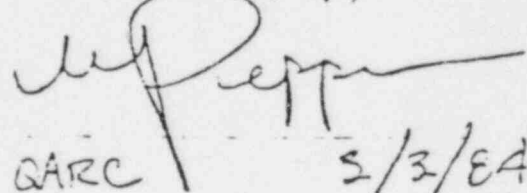
HQA REVIEW 11/17/83
COMPLETE 5/1/84 DATE 2/1/84

BY W. PEPPER DATE 3/3/84SHEET 1 OF 1CHKD. BY — DATE —OFF NO. EC-QARC DEPT NO I 4 CCLIENT LOUISIANA POWER & LIGHTPROJECT WATERFORD IIISUBJECT NCR W3-7579 Attachment #

EC-QARC ACCEPTS FMWA # 34E79
FOR EVIDENCE OF WELDING DONE
ON FW#1 ON INSTRUMENT

PS-NG-0943 BS. HOWEVER, THERE IS
NO OBJECTIVE EVIDENCE THAT
THIS FMWA - CAN BE USED AS
EVIDENCE OF THE FILLER
METAL AND WELD PROCEDURE
USED FOR FW#1 ON INSTRUMENT
PS-NG-0933 BS, FOR WHICH THIS
NCR WAS WRITTEN.

WILLIAM PEPPER



EC-QARC

3/3/84

NCR TRANSMITTAL RECEIPT ACKNOWLEDGEMENT

DATE: 2/27/84

TO: J. Brunori

FROM: *S. Horton*
S. Horton

Attached is NCR-W3- 7560, SUS 76, which is being transmitted to you for (*) 3. As confirmed by your signature below, you are now responsible for the further processing of this NCR and for "hand delivering" it to the next department/organization upon completion of your action.

A copy of this transmittal is being taken to the NCR Tracking Group for data input to the tracking system. Please provide your best estimate for completion of your action on this NCR so that this information can also be added to the tracking data base.

Estimated action completion date: _____

Received by (Print): _____

Signature: _____

Date: _____

TRACKING GROUP ACKNOWLEDGEMENT

The above referenced copies have been received for data input by:

Name (Print): _____

Signature: _____

Date: _____

- (*)
1. Recommended Disposition
 2. Evaluation of Disposition
 3. Corrective Action
 4. Add'l Information
 5. Add'l Corrective Action
 6. Revised Recommended Disposition
 7. Revised Evaluation of Disposition

cc: (w/attachment)
QAS File
D. Findley
L. Bass

SE:mf

Form Revised 1/18/84

FOIA-84-507

16
E-102

REPORT NO. (11) W3-7560

QUALITY ASSURANCE
NONCONFORMANCE REPORT

Yellow - Organization recommended
Disposition
Pink - Information of NCR

INSTRUCTIONS: (See back of form) SUBJ: 15 Brand Code: 6000.00.12

CLIENT OR PROJECT (2)

Louisiana Power & Light Company - Baton Rouge, LA

SUPPLIER, CONSTRUCTION OR CONTRACTOR (3)

Mercury Company of Norwood, Inc.

W3-NY-15

DESCRIPTION OF COMPONENT, PART OR SYSTEM (3)

OCE-1186 PE-Tubing S.A.L.S. 75

DRAWING NO./SPEC NO. (3)

Drawing 151-L-002-A

ASME Sec. IX

MCP-2100

WPS "D"

I. DESCRIPTION OF NONCONFORMANCE (7) (Items Involved, Specification, Code or Standard to Which Items Do Not Comply, Submit Sketch if Applicable)

DWG. 151-L-002-A, Instrument line LS-WS-0312-B5(1P) welds No. 20, 21, 22 and 23 documented on form 197 (see attached) document heat No. 432L7301 for the filler metal applied. Heat No. 432L7301 is for E-7018 filler metal (W.P.S. "B") which is not the correct filler metal for the base metal material welded. Welds No. 20, 21, 22 and 23 join stainless steel tubing to stainless steel valves, the required filler metal for the referenced welds is ER-316 (W.P.S. "D").

ITEM: 0001

NAME AND SIGNATURE OF PERSON REPORTING NONCONFORMANCE (10)

D. Purdin/J. Brunori

TITLE/COMPANY

EC/OARC

DATE (8)

01/27/84

II. RECOMMENDED DISPOSITION (10) (Submit Sketch if Applicable)

OFF ATTACHMENT NO. 2 AF 2-2-94

REPORTABLE	YES	NO
10CFR50.55(a)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10CFR50.55(b)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10CFR50.55(c)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

COPY

NAME AND SIGNATURE OF PERSON RECOMMENDING DISPOSITION (11)

TITLE/COMPANY

EVER/EBASCO

DATE (12)

2-3-84

III. EVALUATION OF DISPOSITION BY EBASCO, REASON FOR DISPOSITION (13)

ENGINEERING AGGREGES WITH THE DISPOSITION ON ATTACHMENT #2. Comply with the requirements in Attachment #2. See attachment #4

IV. CORRECTIVE ACTION (14)

☒ Required

☐ Not Required

VII. ☐ ENGINEERING

☒ QUALITY ASSURANCE

☐ CONSTRUCTION

☒ OTHER QA (3)

NAME (SIGNATURE)

DATE

2-16-84

NAME (SIGNATURE)

DATE

2-20-84

NAME (SIGNATURE)

DATE

February 25, 1984

NAME (SIGNATURE)

DATE

February 25, 1984

☒ ACCEPTED ☐ REJECTED

☒ ACCEPTED ☐ REJECTED

☒ ACCEPTED ☐ REJECTED

☒ ACCEPTED ☐ REJECTED

☒ ACCEPTED WITH COMMENTS

☐ ACCEPTED WITH COMMENTS

☐ ACCEPTED WITH COMMENTS

☐ ACCEPTED WITH COMMENTS

VI. VERIFICATION OF DISPOSITION

☒ REQUIRED

☐ NOT REQUIRED (15)

UTILITY

SIGNATURE

TITLE

DATE

COMPASS REPORT 25

CONTRACT NO. 13-1-15
PROJECT NAME WATERFORD III
ASME SECTION III, CLASS 3
113-7560

WELD-UP SYSTEM VISTAL INSPECTION PROCEDURE QCP-3110.5, REV 3
K ID. NA CABLE NO. NA TAIL NO. NA
NO. 011022A REV. 2/11 Dwg. NO. 001001N REV. NA Dwg. NO. 2/11
DISTRIBUTION: ORIG. TO: MQA PROJ. FOLDER, COPIES TO: ☒ CLIENT ☐ NA ☐ NA 931

D I	WELD SIZE	WELDER ID	WPS NO.	FILLER METAL FIT-UP			FIT-UP INSP/ 3110.5	WELDER ID	WPS NO.	FILLER METAL FINAL			FINAL INSP/ 3110.5
				TYPE	SIZE	HT NO				TYPE	SIZE	HT NO	
2	1/8	1/2	M-197	ER	3/16	702 549	02 6/3/91	M-197	D	ER	3/16	702 549	02 6/3/91
1	1/8	1/2	M-197	ER	3/16	702 549	02 6/3/91	M-197	D	ER	3/16	702 549	02 6/3/91
2	1/8	1/2	M-197	ER	3/16	702 549	02 6/3/91	M-197	D	ER	3/16	702 549	02 6/3/91
3	1/8	1/2	M-197	ER	3/16	702 549	02 6/3/91	M-197	D	ER	3/16	702 549	02 6/3/91
	1/8	1/2	*										
	1/8	1/2	*SEC	SHEET	30F	3							
			SEE	SHEET	30F	3							
	1/8	1/2	D	SEE SHEET	3	of	3	D					
0	1/8	1/2	D	SEE SHEET	3	of	3	D					
<div>OK</div>													
													THIN S FOR EVAL

OF REJECTED WELDS: INDICATE LOCATION.
NO. AND REASON FOR REJECTION.
MQA REVIEW 11-6-93
COMPLETE C/A. DATE 11/6/92
* THESE WELDS HAVE TO
BE REWELDED BY 31.40 AS PER 31.2

CONSTRUCTION WAREHOUSE

HEAT NO.	TYPE	SIZE	PURCHASE ORDER NO.	DATE
51795	ER309	3/32	1897-D	78-05242
55210	E7052	3/32	WP3-	79-03912
4136T316	ER316	3/32		
22P0461	E7018	3/32		
22P0461	E7018	3/32		
50549	ER316	1/16	WP3-2217D	903594
51795	ER309	3/32	WP3-1387D	78-05242
52549	ER316	1/8	WP3-2217D	
01P1661	E7018	3/32		
405	E7052	1/8	WP3-3628	
06811000	EUT1800	3/32		
07800100	EUT1800	3/32		
07800100	EUT1800	3/32		
549	ER316	1/16		
51	E7018	3/32		
07800100	EUT1800	3/32		
2K3461	E7018	1/8		
2K3461	E7018	1/8		
07800100	EUT1800	3/32		
405	E7052	1/8	WP3-3628	80-02446
2K5381	E7018	3/32		
549	ER316	1/8		
549	ER316	1/16		
0L7301	E7018	3/32		
03461	E7018	1/8		
07800100	EUT1800	3/32		
K7261	E7018	3/32		
549	ER316	1/16		
04007	E7018	3/32		
04007	E7018	3/32		
03461	ER309	3/32		
3461	E7018	1/8		
SA & 22143	E7018	3/32		
549	ER316	1/16		

COPY



REVIEW OF INITIATION PAGE 1 OF ATT #1
REQUIRES FURTHER DOCUMENTATION NOT STATED IN
DESCRIPTION -

1. WELD PROCEDURE USED WAS WPS "D"
2. FILLER METAL TYPE USED WAS ER 316
3. FILLER METAL SIZE USED WAS 1/16"

COPY

FOR US TO CONCLUDE THAT THE FILLER METAL
HWT NO. IS CORRECT WOULD MANDATE THAT THE
DOCUMENTATION FOR THE ABOVE 3 STATEMENTS
IS INCORRECT. THIS WOULD NOT BE PRUDENT.
FURTHERMORE FMWA'S 12216 & 12219 BACK
UP FILLER METAL SIZE, TYPE, AND HWT (762549).
PER ATT #1 PAGE 2 FILLER METAL #32L7301 WAS
REC'D WLT IN 3/32" SIZE, THEREFORE QARC TO
DOCUMENT HWT NO. AS 762549.

SEE FILLER METAL WITHDRAWAL AUTHORIZATION SHEET 2 &
3 OF THIS ATTACHMENT. A.F.M.



R. BALLARD 4/2/84
R. BALLARD
1 EC CONSTR ONLY

SERIAL NO. 12219

MERCURY CO. OF NORWOOD
P.O. Box 782
Kiliana, LA 70056

COPY

FILLER METAL WITHDRAWAL AUTHORIZATION

SYSTEM 76 DWG. NO. 151-L-007-A

OCR NO. 1186 WELD PROC. D

WORK UNIT/INSTRUMENT NO. LS-MS-0312 BS

WELDER'S NAME A. Adams STAMP NO. M-197

AUTHORIZED SIGNATURE C. Klueh DATE 6-4-81

FILLER MATERIALS ISSUED:

QUANTITY 10 PCS TYPE ER 316 SIZE 1/16

LOT AND HEAT NO. 762549

ISSUED BY R. MARAII DATE 6-4-81



FILLER MATERIALS RETURNED:

QUANTITY 7 TYPE ER 316 SIZE 1/16

LOT AND HEAT NO. 762549

CHECKED BY R. MARAII DATE 6-4-81

SERIAL NO. 12216

ATTACHMENT#2
SH-3 OF 3
NCR W3-7560

MERCURY CO. OF NORWOOD
P.O. Box 782
Killona, LA 70066

COPY

FILLER METAL WITHDRAWAL AUTHORIZATION

SYSTEM 7L DWG. NO. 151-L-002-A

OCR NO. 1196 WELD PROC. D

WORK UNIT/INSTRUMENT NO. LS-M5-031285

WELDER'S NAME A. Adams STAMP NO. M-197

AUTHORIZED SIGNATURE C. K. K. K. DATE 6-3-81

FILLER MATERIALS ISSUED:

QUANTITY 18 PCS TYPE ER 316 SIZE 1/16

LOT AND HEAT NO. 7L2549

ISSUED BY TC. MARAID DATE 6-3-81

FILLER MATERIALS RETURNED:

QUANTITY 5 TYPE ER 316 SIZE 1/16

LOT AND HEAT NO. 7L2549

CHECKED BY TC. MARAID DATE 6-3-81

RECORD COPY

M.Q.C. REVIEW 76281



ATTACHMENT #2 IS REJECTED BY THE QAE OF RECORD FOR THE FOLLOW REASON(S)

1- THE QAE OF RECORD IS UNABLE TO CONCLUDE THE INSTALLATION IS ACCEPTABLE WITH THE ATTACHED PUBLISHED DOCUMENTATION VS. THE MERCURY COMPANY REQUIREMENT FOR THE GENERATING OF CORRECT DOCUMENTATION;

(a) THE CORRECTLY GENERATING OF FORM 197-1 (ATTACHMENT #1 PAGE 1) WAS A MERCURY COMPANY REQUIREMENT.

2- THIS QAE IS UNABLE TO CONCLUDE THE AUTHOR(S) OF ATTACHMENT #1 PAGE 1;

(a) KNEW WHO THE WELDER WAS (M. 197)

(b) KNEW THE PROCEDURE USED (WPS. 9 R/T)

(c) KNEW THE FILLER METAL TYPE (ER 316)

(d) KNEW THE FILLER METAL SIZE ($\frac{1}{16}$)

(e) YET HE DID NOT KNOW THE HEAT NUMBER.

(f) DID HE JUST RANDOMLY SELECT A LEGITIMATE HEAT NUMBER AND RECORD SAME FOR THE FOUR (4) WELDS

(g) AM UNABLE TO CONCLUDE THE FILLER METAL WITHDRAWN ON ATTACHMENT #2 PAGES 2 AND 3 WERE IN FACT UTILIZED ON WELDS #20, 21, 22 AND 23.



NOEL C. GOODRICH

Quality Assurance Re-Evaluation of Disposition

Q.A. has re-reviewed and evaluated the subject nonconformance and has determined the following:

- 1.- According to attachment #1 page 1 of 2, filler metal used was recorded as Heat number- 432L7301, which is E7018 3/32" ϕ , by welder M-197 on June 3,4,1981, for OCE-1186 Instrument- LS-MS-0312BS.
- 2.- According to attachment #2 pages 2 and 3 of 3 (FMA's), filler metal ER316 S/S 1/16" ϕ heat number 762549 was withdrawn on June 3,4,1981 by welder M-197, for OCE-1186 Instrument- LS-MS-0312BS.

Conclusion

Q.A.'s observation is, that due to the above conflicts in filler metal heat numbers, QARC shall research all FMA's dated June 3,4,1981 for welder M-197, and review and determine if any E7018 filler metal was withdrawn and used by welder M-197.

If any E7018 filler metal was withdrawn and used by welder M-197 on June 3,4,1981, welds 20,21,22, and 23 shall be removed and rewelded using approved procedures and filler metal.

If no E7018 filler metal was withdrawn and used by welder M-197 on subject dates, QARC shall correct the applicable Mercury documentation to reflect the proper heat numbers for the subject welds as noted on the FMA's in attachment #1, IAW the applicable procedures.

All documentation generated as a result of the above corrective action shall be attached to NCR for additional review and resolution of NCR.

[Signature]

S. W. Keller QAE February 25, 1984

COPY

REJECT

- 1) IS THE MENTION OF ELMC QA TO DISQUALIFY THE PROCESS INSPECTION MADE BY MERCURY R. LEVEL II INSPECTOR ARROW LTT?
- 2) IT HAS BEEN ESTABLISHED BY EC-QARC THAT THE ELMC'S ON FILE ARE NOT COMPLETE AND CANNOT BE USED TO ESTABLISH ALL WELDING DONE BY A CERTAIN WELDER ON THE DATES IN QUESTION.
- 3) THE QA CONCERNS RAISED BY ATTACHMENT #3 HAVE NOT BEEN ANSWERED.
- 4) IF EC-QARC IMPLEMENTS THE CORRECTIVE ACTION REQUIRED BY ATTACHMENT #4 IT WILL ESTABLISH THAT ALL ENTRIES MADE BY ARROW LTT MQC LEVEL II ARE SUSPECT.

COPY



LOUISIANA

POWER & LIGHT / INTER-OFFICE CORRESPONDENCE

March 2, 1984

W3K84-0170
Q3-A35.01

TO: Ron Bennett

FROM: *Tom*
Tom Gerrets

REFERENCE: W3K84-0097

SUBJECT: Responses to Interview Questions

My response to the concerns listed in the referenced letter are as follows:

Concern: 5.1 Quality Assurance performing work beyond the tasked requirement; training, procurement, procedure writing.

Response: 10CFR Appendix B, Criterion I states in part as follows:

"The persons and organizations performing quality assurance functions shall have sufficient authority and organizational freedom to identify quality problems; to initiate, recommend, or provide solutions; and to verify implementation of resolutions."

In cases where procedures are inadequate or do not exist, it is appropriate for QA to be involved with procedure revision or development in that we are, in effect, "providing solutions to quality problems."

Also, per the recently revised FSAR Section 17.2.5.4, the QA Section is tasked with the review of certain quality related procedures. There may be a few cases where there is a "gray area" concerning where "review" ends and "procedure writing" begins. But these instances are very limited and increased involvement by QA may be entirely appropriate to the circumstances that exist at the time.

FOIA-89-507

17

Concern: 5.2 QA Training for plant staff not being implemented in a timely manner.

Response: Additional Quality Assurance training modules have been developed by the plant staff training personnel. There modules were developed for front line plant supervision, procurement and warehouse personnel and records and document personnel. Teaching of the modules is beginning and will be a part of the normal training that personnel working in these areas will receive. For further information see the attached memo from D. F. Packer to T. F. Gerrets dated February 10, 1984 (W3T84-0035).

Concern: 5.3 Memorandum issued by the Sr. VP changing procedure to violate ANSI Standards.

Response: If this has occurred it is a legitimate concern and one which we intend to take immediate corrective action to resolve. However, we need further details or an example before we can provide a more specific response.

Concern: 5.4 LP&L in violation of ANSI N18.7 in handling of nonconformances; (reference UNT 2-001).

Response: If this is the case, then this is a legitimate concern. However, without further details we cannot provide a more specific response. For information purposes we would like to state that the plant staff is currently developing a set of procedures (QP's) which will address each of the 18 criteria of 10CFR50, Appendix B. It is intended, at this time, that the Quality Assurance Section will have review and concurrence responsibilities in the development of these procedures. It is further intended that this QA review will assure that the requirements of the Regulatory Guides and Industry Standards LP&L has committed to in the FSAR, including ANSI N18.7 are contained in these procedures.

TFG/cmb

NCR TRANSMITTAL/RECEIPT ACKNOWLEDGEMENT

DATE: 3-5-84

TO: J. Brunori
Sam Horton
FROM: S. Horton

***NOTE: PER ATTACHMENT #2 (CORRECT QC WDR), AS
PREVIOUSLY REQUESTED ON 2-23-84.
S. Kelsey

Attached is NCR-W3- 7579, SUS 25-9, which is being transmitted to you for (*) 3. As confirmed by your signature below, you are now responsible for the further processing of this NCR and for "hand delivering" it to the next department/organization upon completion of your action.

A copy of this transmittal is being taken to the NCR Tracking Group for data input to the tracking system. Please provide your best estimate for completion of your action on this NCR so that this information can also be added to the tracking data base.

Estimated action completion date: ASAP

Received by (Print): S. K. Brunori

Signature: *S. K. Brunori*

Date: 3-07-84

TRACKING GROUP ACKNOWLEDGEMENT

The above referenced copies have been received for data input by:

Name (Print): _____

Signature: _____

Date: _____

- (*)
1. Recommended Disposition
 2. Evaluation of Disposition
 3. Corrective Action
 4. Add'l Information
 5. Add'l Corrective Action
 6. Revised Recommended Disposition
 7. Revised Evaluation of Disposition

cc: (w/attachment)
QAS File
D. Findley
L. Bass

QUALITY ASSURANCE
NONCONFORMANCE REPORT

FEB 23 1984

White - QA/E or Site QA Supervisor
Yellow - Organization recommending disposition
Pink - Initiator of NCR

W3-7579

REVISIONS: (See back of form) SUS: 25-9 Trend Code: 9000.01.30

OR PROJECT (2) Louisiana Power & Light Company - Waterford III

DRAWING NO./SPEC NO. (3) ASME III CLASS III

SUPPLIER, CONSTRUCTION OR CONTRACTOR (4) Mercury Company of Norwood, Inc.

P.O. NO. (5) W3-NY-15

DESCRIPTION OF COMPONENT, PART OR SYSTEM (6) OCR #1101 LINE #PS-NG-0933BS

I. DESCRIPTION OF NONCONFORMANCE (7) (Items Involved, Specification, Code or Standard to Which Items Do Not Comply, Submit Sketch if Applicable)

During review of OCR #1101 the following discrepancy was revealed: FW#1 is a 1" x 1/2" s/s adapter welded to a 1" c/s valve, the filler material, type and heat number for this weld is correct, but WPS 'D' was used, the correct WPS is 'G'. No FMWA exists in the vault that could possibly clarify the documentation, therefore, it is indeterminate as to whether the correct WPS or filler material and type was used. This is in violation of MCP-2100.

ITEM: 0001

NAME AND SIGNATURE OF PERSON REPORTING NONCONFORMANCE (8) W. Pepper/J. Brunori

TITLE/COMPANY (9) EC/QARC - Supervisor

DATE (10) 2/2/84

II. RECOMMENDED DISPOSITION (11) (Submit Sketch if Applicable)

SEE ATTACHMENT #2 M.C. 2.16-30

REPORTABLE	YES	NO
10CFR50.55(a)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10CFR21	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Reviewed by: MTS Date: 2/7/84		

NAME AND SIGNATURE OF PERSON RECOMMENDING DISPOSITION (12) RICK W. WEYANT

TITLE/COMPANY (13) SEN. RES. I/C ENG EGASO

DATE (14) 2-10-84

III. EVALUATION OF DISPOSITION BY EBASCO, REASON FOR DISPOSITION (15)

See Attachment #2

IV. CORRECTIVE ACTION (16) ☒ Required ☐ Not Required

W3 2.17.84

W3 2.17.84

V.18: <input checked="" type="checkbox"/> ENGINEERING	<input checked="" type="checkbox"/> QUALITY ASSURANCE	<input type="checkbox"/> CONSTRUCTION	<input type="checkbox"/> OTHER
NAME (SIGNATURE) <i>[Signature]</i>	NAME (SIGNATURE) NOEL G. GOODRICH	NAME (SIGNATURE)	NAME (SIGNATURE)
DATE 2-23-84	DATE 2.23.84	DATE	DATE
<input checked="" type="checkbox"/> ACCEPTED <input type="checkbox"/> REJECTED	<input checked="" type="checkbox"/> ACCEPTED <input type="checkbox"/> REJECTED	<input type="checkbox"/> ACCEPTED <input type="checkbox"/> REJECTED	<input type="checkbox"/> ACCEPTED <input type="checkbox"/> REJECTED
<input type="checkbox"/> ACCEPTED WITH COMMENTS	<input type="checkbox"/> ACCEPTED WITH COMMENTS	<input type="checkbox"/> ACCEPTED WITH COMMENTS	<input type="checkbox"/> ACCEPTED WITH COMMENTS

VERIFICATION OF DISPOSITION

☒ REQUIRED ☐ NOT REQUIRED (17)

BY: *[Signature]* SIGNATURE TITLE DATE

EBASCO SERVICES INCORPORATED

BY A. FARIDI DATE 2-16-84SHEET 1 OF 3

CHKD. BY _____ DATE _____

OFS NO. _____ DEPT. NO. _____

CLIENT LPSLPROJECT WATERFORD UNIT NO. 3SUBJECT NCR W3-7579 ATTACHMENT #2

BY CHECKING THE FILLER METAL WITHDRAWAL SHEET

IT APPEARS THAT WELDER M-214 HAS WELDED INSTRUMENTS

PS-NG-0943BS AND PS-NG-0933BS ON THE SAME DATE

(9-22-82) BY USING WELDING PROCEDURE TYPE "G".

NO FILLER METAL WITHDRAWAL AUTHORIZATION SHEET

FOR WELD PROC. "D" ON 9-22-82 REGARDING M-214 WAS

FOUND. THEREFORE QUALITY CONTROL WELD DATA REPORT

SHALL BE CORRECTED AS TO INDICATE TYPE "G" IN LIEU OF

TYPE "D" UNDER WPS NO.

USE AS IS. WELDING CONCURRENCE IS REQUIRED.

A. Faridi

ISL CONSTR. ENGR

2-16-84



NCR W3-7579
ATTACHMENT #2
SH 20F3

SERIAL NO. 34879

MERCURY CO. OF NORWOOD
P.O. Box 782
Killona, LA 70066

MERCURY Q/A
RECORD COPY

FILLER METAL WITHDRAWAL AUTHORIZATION

SYSTEM 25.9 DWG. NO. 166-L-004-A
OCR NO. 1101 WELD PROC. G
WORK UNIT/INSTRUMENT NO. DS NG 0948.B5
WELDER'S NAME W. MARYANT STAMP NO. m 214
AUTHORIZED SIGNATURE J. BERGERON DATE 9-22-82

FILLER MATERIALS ISSUED:

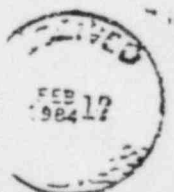
QUANTITY 8. Pcs TYPE ER 309 SIZE 3/32
LOT AND HEAT NO. 761795
ISSUED BY R. MARALLO DATE 9-22-82

FILLER MATERIALS RETURNED:

QUANTITY 5 TYPE ER 309 SIZE 3/32
LOT AND HEAT NO. 761795
CHECKED BY C. Philant DATE 9-22-82

M.Q.C. REVIEW

P. Pellerin
9-22-82



OF WOODWARD, INC.
7120 WOOD LANE, SUITE 100

CHART 1-1 OF 1-1

PROJECT NO. W45720
CONTRACT NO. W3-AY-15
PROJECT NAME WATERFORD III
ASME SECTION III, CLASS 3

CON CRIG. TO: 194 PRO. BINDER COPIES TO: ☒ CLIENT ☐ NIA ☐ NIA

MERCURY 0/A
RECORD C/A

HQA REVIEW 17p 4/7/83
COMPLETE 8/5/83, DATE 2/27/83

NCR TRANSMITTAL/RECEIPT ACKNOWLEDGEMENTDATE: 3-7-84TO: J. Brunori
Sam Horton
FROM: S. Horton***NOTE: PER ATTACHMENT #2 & 3:
S. Kelsey

Attached is NCR-W3- 7560, SUS 76, which is being transmitted to you for (*) 3. As confirmed by your signature below, you are now responsible for the further processing of this NCR and for "hand delivering" it to the next department/organization upon completion of your action.

A copy of this transmittal is being taken to the NCR Tracking Group for data input to the tracking system. Please provide your best estimate for completion of your action on this NCR so that this information can also be added to the tracking data base.

Estimated action completion date: ASAPReceived By (Print): SW SEAMANSignature: [Signature]Date: 3-07-84TRACKING GROUP ACKNOWLEDGEMENT

The above referenced copies have been received for data input by:

Name (Print): _____

Signature: _____

Date: _____

- (*) 1. Recommended Disposition
2. Evaluation of Disposition
3. Corrective Action
4. Add'l Information
5. Add'l Corrective Action
6. Revised Recommended Disposition
7. Revised Evaluation of Disposition

cc: (w/attachment)
QAS File
D. Findley
L. Bass

SE:guf

Form Revised 1/18/84

FOIA-84-507
19

E-102

REPORT NO. (1) W3-7560

INSTRUCTIONS: (See back of form) SUS: 76 Trend Code: 6000.00.12

CLIENT OR PROJECT (2)

Louisiana Power & Light Company - Waterford III

SUPPLIER, CONSTRUCTION QC OR CONTRACTOR (4)

Mercury Company of Norwood, Inc.

P.O. NO. (5)

W3-NY-15

DESCRIPTION OF COMPONENT, PART OR SYSTEM (6)

OCR-1186 P3-Tubing S.L.S. 76

DRAWING NO./SPEC NO. (8)

Drawing 151-L-002-A

ASME Sec. IX

MCP-2100

WPS "D"

I. DESCRIPTION OF NONCONFORMANCE (7) (Items Involved, Specification, Code or Standard to Which Items Do Not Comply, Submit Sketch if Applicable)

DWG. 151-L-002-A, Instrument line LS-MS-0312-B5(LP) welds No. 20, 21, 22 and 23 documented on form 197 (see attached) document heat No. 432L7301 for the filler metal applied. Heat No. 432L7301 is for E-7018 filler metal (W.P.S."B") which is not the correct filler metal for the base metal material welded. Welds No. 20, 21, 22 and 23 join stainless steel tubing to stainless steel valves, the required filler metal for the referenced welds is ER-316 (W.P.S."D").

ITEM: 0001

NAME AND SIGNATURE OF PERSON REPORTING NONCONFORMANCE (10)

D. Purdin/J. Brunori *Dennis Brunori*

TITLE/COMPANY

EC/QARC

DATE (9)

01/27/84

II. RECOMMENDED DISPOSITION (11) (Submit Sketch if Applicable)

SEE ATTACHMENT NO. 2 AF 2-2-84

REPORTABLE	YES	NO
10CFR50.55(b)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10CFR21	<input type="checkbox"/>	<input checked="" type="checkbox"/>

MCP-2100 - 151-L-002-A

NAME AND SIGNATURE OF PERSON RECOMMENDING DISPOSITION (11)

P. GREENWELL *P. Greenwell*

TITLE/COMPANY

ENGR/EBASCO

DATE (12)

2-3-84

III. EVALUATION OF DISPOSITION BY EBASCO, REASON FOR DISPOSITION (13)

① ENGINEERING AGREES WITH THE DISPOSITION ON ATTACHMENT #2. Comply with the requirements in ATTACHMENT #2.

③ See attachment #3

IV. CORRECTIVE ACTION (14)

☒ Required☐ Not Required

ON 2-20-84

V. (15) ☐ ENGINEERING(2) ☒ QUALITY ASSURANCE☐ CONSTRUCTION☒ OTHER QA (P)

NAME (SIGNATURE)

John G. Goodrich

NAME (SIGNATURE)

John G. Goodrich

NAME (SIGNATURE)

John G. Goodrich

NAME (SIGNATURE)

John G. Goodrich

DATE

2-16-84

DATE

2-20-84

DATE

John G. Goodrich

DATE

2-25-84

☐ ACCEPTED ☐ REJECTED☒ ACCEPTED ☐ REJECTED☐ ACCEPTED ☐ REJECTED☐ ACCEPTED ☐ REJECTED☐ ACCEPTED WITH COMMENTS☐ ACCEPTED WITH COMMENTS☐ ACCEPTED WITH COMMENTS☐ ACCEPTED WITH COMMENTS

VI. VERIFICATION OF DISPOSITION

☒ REQUIRED☐ NOT REQUIRED (16)(17) BY *John G. Goodrich* SIGNATURE

EBASCO VENDOR QA OR QA

ENGINEERING

TITLE

DATE

PROJECT NO. W49720
CONTRACT NO. W3-MT-15 ICOF
PROJECT NAME WATERFORD III
ASME SECTION III, CLASS 3
ATTACHMENT #1
W3-2560 p.1 of 2

0-1186 START-UP SYSTEM NO. 76 VISUAL INSPECTION PROCEDURE QCP-3110.5, REV. 3
 BACK NO. NA CABINET NO. NA PANEL NO. NA INSTRUMENT NO. 15-A15-5131-1354
 DWG. NO. 1511002A REV. 0/12 DWG. NO. 0001001N REV. 1/12 DWG. NO. NA 1/12 REV. 1/12
 DISTRIBUTION: ORIG. TO: MQA PROJ. FOLDER, COPIES TO: ☒ CLIENT ☐ NA ☐ NA 954

[illegible]

WORK OF REJECTED WELDS: INDICATE LOCATION.
NO. AND REASON FOR REJECTION.

MQA REVIEW *W.A. Barnes* - 7-883
COMPLETE *W.A. Barnes* DATE 11/6/82

~~RECEIVED FBI #17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100~~
 17 PER RD 2 NEW TLO 12-24-82
 RELETED FW #16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40 AS FOR 21.2 10/10/83
 202-151-2-002A A LETT 8/9/81

COMPLETE W.A. Barnes DATE 11/6/82

* THESE NEWS HAVE 109
 ENTERED ON Pg. 3 of 3
 411:10:

This is Attachment _____
to NCR WG-_____ page _____
of _____

ATTACHMENT 1
W3-7560 p. 2 of 2
MERCURY COMPANY OF NORTH CAROLINA



A FISC-BACH COMPANY

CONSTRUCTION WAREHOUSE

HEAT NO.	TYPE	SIZE	PURCHASE ORDER NO.	MPIR
761795	ER309	3/32	1387-D	78-05242
065210	E70S2	3/32	WP3-	79-03912
C4136T316	ER316	3/32		
422P0461	E7018	3/32		
422P0461	E7018	3/32		
762549	ER316	1/16	WP3-2217D	903594
761795	ER309	3/32	WP3-1387D	78-05242
762549	ER316	1/8	WP3-2217D	
401P1661	E7018	3/32		
97405	E70S2	1/8	WP3-3628	
3306811000	EUT1800	3/32		
3307800100	EUT1800	3/32		
3307800100	EUT1800	3/32		
762549	ER316	1/16		
0651	E7018	3/32		
3307800100	EUT1800	3/32		
402K3461	E7018	1/8		
402K3461	E7018	1/8		
3307800100	EUT1800	3/32		
97405	E70S2	1/8	WP3-3628	80-02446
412K5381	E7018	3/32		
762549	ER316	1/8		
762549	ER316	1/16		
432L7301	E7018	3/32		
402K3461	E7018	1/8		
3307800100	EUT1800	3/32		
401K7261	E7018	3/32		
762549	ER316	1/16		
18004007	E7018	3/32		
18004007	E7018	3/32		
773307	ER309	3/32		
461	E7018	1/8		
3338A & 22143	E7018	3/32		
762549	ER316	1/16		
19804	E7018	3/32		



EBASCO SERVICES INCORPORATED

BY RH DATE 2/2/84SHEET 1 OF 3

CHKD. BY _____ DATE _____

OFS NO. _____ DEPT. NO. _____

CLIENT LP&LPROJECT WATERFORD UNIT # 3SUBJECT NCR W3-7560

ATTACHMENT # 2

REVIEW OF INITIATES' PAGE 1 OF ATT #1
REVEALS FURTHER DOCUMENTATION NOT STATED IN
DESCRIPTION:

1. WELD PROCEDURE USED WAS WPS "D".
2. FILLER METAL TYPE USED WAS ETC 316.
3. FILLER METAL SIZE USED WAS $\frac{1}{16}$ "

FOR US TO CONCLUDE THAT THE FILLER METAL
HEAT NO. IS CORRECT WOULD MANDATE THAT THE
DOCUMENTATION FOR THE ABOVE 3 STATEMENTS
IS INCORRECT. THIS WOULD NOT BE PRUDENT.
FURTHERMORE FMWA'S 12216 & 12219 BACK
UP FILLER METAL SIZE, TYPE, AND HEAT (762549).
PER ATT #1 PAGE 2 FILLER METAL 452L7301 WAS
REV'D ONLY IN $\frac{3}{32}$ " SIZE, THEREFORE QARC TO
DOCUMENT HEAT NO. AS 762549.

SEE FILLER METAL WITHDRAWAL AUTHORIZATION SHEET 2 &

3 OF THIS ATTACHMENT. A.F.m.b. 2-289



R.H. Ballard 4/2/84
R.H. BALLARD
1 EC CONSTR ONLY.

SERIAL NO. 12219**COPY**MERCURY CO. OF NORWOOD
P.O. Box 782
Killona, LA 70066

FILLER METAL WITHDRAWAL AUTHORIZATION

SYSTEM 76 DWG. NO. 151-L-007-AOCR NO. 1186 WELD PROC. DWORK UNIT/INSTRUMENT NO. LS-M3-0312 BSWELDER'S NAME A Adams STAMP NO. M-197AUTHORIZED SIGNATURE P. Klumbert DATE 6-4-81

FILLER MATERIALS ISSUED:

QUANTITY 10 PCS TYPE ER 316 SIZE 1/16LOT AND HEAT NO. 762549ISSUED BY R. MARAII DATE 6-4-81

FILLER MATERIALS RETURNED:

QUANTITY 7 TYPE ER 316 SIZE 1/16LOT AND HEAT NO. 762549CHECKED BY R. MARAII DATE 6-4-81M.O.C. REVIEW 26381

SERIAL NO. 12216

MERCURY CO. OF NORWOOD
P.O. Box 782
Killona, LA 70066

ATTACHMENT #2
SH. 3 OF 3
NCR W3-7560

COPY

FILLER METAL WITHDRAWAL AUTHORIZATION

SYSTEM 76 DWG. NO. 151-L-002-A
OCR NO. 1186 WELD PROC. D
WORK UNIT/INSTRUMENT NO. LS-MS-0312BS
WELDER'S NAME A. Adams STAMP NO. M-197
AUTHORIZED SIGNATURE C. K. K. K. DATE 6-3-81

FILLER MATERIALS ISSUED:

QUANTITY 10 PCS TYPE ER 316 SIZE 1/16
LOT AND HEAT NO. 762549
ISSUED BY R. M. GRAILLO DATE 6-3-81

FILLER MATERIALS RETURNED:

QUANTITY 5 TYPE ER 316 SIZE 1/16
LOT AND HEAT NO. 762549
CHECKED BY R. M. GRAILLO DATE 6-3-81

RECORD COPY

M. Q. C. REVIEW 66281



NONCONFORMANCE REPORT W3-7560

EVALUATION OF DISPOSITION - EBASCO QUALITY ASSURANCE

D.A. furnished with attachment #2. QARC to correct QWAF
as requested on att. #2, and attach. copy to NCR for closure.

Copies of the following documents shall be returned with this Nonconformance Report to Ebasco Quality Assurance to verify corrective action taken. This shall also include any additional documents generated as required by the Quality Assurance Program and attendant procedures. The following documents have been requested by Ebasco Quality Assurance:

PT/RT/UT Report Nos. _____	Procedure Nos. _____
PCS/Traveler Nos. _____	Drawing Nos. _____
DCN/FCR Nos. _____	Sketch Nos. _____
Inspection Report Nos. _____	<u>Reviewed</u> <u>7/25/74</u> <u>QWAF</u>
Test Report Nos. _____	_____
Calibration Report Nos. _____	_____

S. L. Fike
Name and Signature

QA Engineer
Title

March 7, 1984
Date