



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

POR-016

MAR 11 1985

Mr. Thomas Devine  
Ms. Crystal Dixon  
Government Accountability Project  
1555 Connecticut Avenue, NW, Suite 202  
Washington, DC 20036

IN RESPONSE REFER  
TO FOIA-84-741

Dear Mr. Devine and Ms. Dixon:

This is in further response to your letter dated September 13, 1984, in which you requested, pursuant to the Freedom of Information Act, all documents associated with the August 20, 1984, Director's decision under 10 CFR 2.206 in response to petitions filed on behalf of the San Luis Obispo Mothers for Peace.

The documents listed on the enclosed appendix are being placed in the NRC Public Document Room. They will be filed in the PDR folder FOIA-84-741 under your name.

The NRC has not completed its review of the remaining documents subject to your request. We will respond as soon as that review is completed.

Sincerely,

A handwritten signature in cursive script, reading "John Philby for", is written over the typed name.

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

Enclosure: As stated

1. 11/29/83 Memo to Commissioners from W.J. Dircks; Plans for Dealing with Allegations Relating to Diablo Canyon. (10 pages)
2. undated NRC Table of Status Allegations Submitted by GAP on 2/2/84 and the Joint Intervenors on 2/22/84. (32 pages)

# GOVERNMENT ACCOUNTABILITY PROJECT

Institute for Policy Studies  
1901 Que Street, N.W., Washington, D.C. 20009

(202) 234-9382

September 13, 1984

Director  
Office of Administration  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

FREEDOM OF INFORMATION  
ACT REQUEST  
FOIA-84-741  
Rec'd 9-17-84

To Whom It May Concern:

Pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. §552, the Government Accountability Project (GAP) requests copies of any and all agency records and information, including but not limited to notes, letters, memoranda, drafts, minutes, diaries, logs, calendars, tapes, transcripts, summaries, interview reports, procedures, instructions, files, graphs, engineering analyses, charts, maps, photographs, agreements, handwritten notes, studies, data sheets, notebooks, books, telephone messages, computations, voice recordings, any other data compilations, interim and/or final reports, status reports, and any other records relevant to and/or generated in connection with the August 20, 1984 directors' decision under 10 C.F.R. 2.206 in response to various petitions filed pursuant to 10 C.F.R. 2.206 by the Government Accountability Project (GAP) on behalf of the San Louis Obispo, Mothers for Peace. We request that each responsive document be identified by the allegation number(s) to which it may relate.

If any of the materials covered by this request have been destroyed and/or removed, please provide all surrounding documentation, including but not limited to a description of the action(s) taken, relevant date(s), and justification(s) for the action(s).

GAP requests that fees be waived, because "findings information can be considered as primarily benefitting the general public," 5 U.S.C. §552(a)(4)(A). GAP is a non-profit, non-partisan public interest organization concerned with honest and open government. Through legal representation, advice, national conferences, films, publications and public outreach, the project promotes whistleblowers as agents of government accountability. We are requesting the above information as part of an on-going monitoring project on the adequacy of the NRC's efforts to protect public safety and health at nuclear power plants.

For any documents or portions that you deny due to the specific FOIA exemption, please provide an index itemizing and describing the documents or portions of documents withheld. The index should provide a detailed justification of your grounds for claiming each exemption, explaining why each exemption is relevant to the document or portion of the document withheld. This index is required under Vaughn v. Rosen(I), 484 F.2d. 820 (D.C. Cir. 1973), cert. denied, 415 U.S. 977 (1974).

We look forward to your response to this request within ten days.

Yours truly,  
*Thomas Devine*  
Thomas Devine  
Legal Director

*Crystal Dixon*  
Crystal Dixon  
Legal Intern

1P  
~~8503040198~~ PDR

November 29, 1983

Distribution

EDO R/F

TRehm

JRoe

WJDircks

Rehm R/F

MEMORANDUM FOR: Chairman Palladino  
Commissioner Gilinsky  
Commissioner Roberts  
Commissioner Asselstine  
Commissioner Bernthal

FROM: William J. Dircks  
Executive Director  
for Operations

SUBJECT: PLANS FOR DEALING WITH ALLEGATIONS RELATING TO  
DIABLO CANYON

Enclosed for your information is my guidance for dealing with the approximately 72 Diablo Canyon allegations and the staff work plan developed to implement that guidance.

Action plans which assign staff and outline the approach to resolution have been developed for each allegation. These detailed worksheets are available should any Commissioner desire to review them. The initial on-site work will be conducted this week with approximately 17 staff assigned. Other related work has begun or will begin promptly.

The interim report will be provided to me by December 19 - a date selected so as to be approximately 10 days prior to the current estimate of the licensees criticality readiness. I will provide it to you promptly after receipt.

(Signed) William J. Dircks

William J. Dircks  
Executive Director  
for Operations

Enclosure:  
As stated

cc: OPE  
OGC

bcc: V. Stello  
J. Roe

*Handwritten:* 11/27  
*Handwritten:* [unclear]

*Handwritten:* 8543200192 1P PDR

AO/EDO	EDO	EDO					
TARehm;pv	JRoe	WJDircks					
11/ /83	11/ /83	11/ 27/83					



November 17, 1983

MEMORANDUM FOR: John B. Martin, Regional Administrator, Region V  
Harold R. Denton, Director, NRR  
Richard C. DeYoung, Director, IE

FROM: William J. Dircks  
Executive Director for Operations

SUBJECT: REVIEW OF ALLEGATIONS OUTSTANDING ON DIABLO CANYON  
NUCLEAR POWER PLANT

At the Commission meeting of October 28, 1983, the staff was directed to pursue all outstanding allegations to resolution. In addition, the Commission directed the staff to provide a status report "...addressing these matters..." prior to the authorization of criticality and low power testing.

I have designated Jack Martin, Region V, as having line responsibility for this activity. T. Bishop has been further designated by Jack Martin to direct this effort. He is charged with the responsibility to:

- ° identify in coordination with NRR, IE and OI all outstanding allegations;
- ° develop a work plan and schedule in concert with NRR and IE which will direct the effort of offices involved to pursue all allegations to conclusion;
- ° provide a coordinated status report to EDO approximately 10 days prior to Commission consideration of criticality and low power testing by Diablo Canyon; and
- ° produce a final report which will provide final conclusions on all outstanding allegations.

In the way of general guidance, I would point out that it is necessary to begin development of a work plan on a high priority basis. This plan should reflect a scoping and prioritization of allegations so that the required status report will be able to provide to the maximum extent feasible, reasonable information to the Commission on which they can make a determination on Diablo Canyon in regard to criticality and low power licensing. Completion of the evaluation of all allegations must be accomplished, but it is more important that they be reviewed correctly than that a particular completion time be met.

~~8503200200 277~~  
PDR

I expect all Offices involved to give full support to Mr. Bishop in this effort. The OEDO should be contacted if problems develop or assistance is needed.

(Signed) William J. Dircks

William J. Dircks  
Executive Director for Operations

cc: B. Hayes  
G. Cunningham  
V. Stello  
R. Minogue  
T. Bishop, RV

DISTRIBUTION

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11/17/83

:AO/EDO	:EDO	:	:	:	:	:
:TAREhm;pv	:WJDircks	:	:	:	:	:
:11/17/83	:11/17/83	:	:	:	:	:

DIABLO CANYON ALLEGATION MANAGEMENT PROGRAM

NOVEMBER 23, 1983

Approval:

R. DeYoung 11/23/83  
R. DeYoung, Director, IE Date

H. R. Denton 11/23/83  
H. R. Denton, Director, NRR Date

J. B. Martin 11/23/83  
J. B. Martin, Administrator, Date  
Region V

38PP

8503200207 PDR

# Diablo Canyon Allegation Management Program

## Contents

	<u>Page</u>
I Purpose . . . . .	1
II Scope . . . . .	1
III Methodology/Approach . . . . .	1
IV Schedule . . . . .	2
V Protection of Individuals . . . . .	3
VI Development and Retention of Supporting Data. . . . .	4
VII Special NRC Staff Actions . . . . .	4
VIII Manpower Accounting . . . . .	4

## ATTACHMENTS

1. Diablo Canyon Allegation Management Staff
2. Format For Diablo Canyon Nuclear Power Plant Allegation and/or Investigations Summary
3. Format for Allegation Action Plan

## DIABLO CANYON ALLEGATION MANAGEMENT PROGRAM

### I. Purpose

The purpose of the Diablo Canyon Allegation Management Program is to:

Provide for a systematic examination and analysis of allegations and expressions of concern pertaining to design, construction, operation and management of safety-related structures, systems, and components at the Diablo Canyon Nuclear Power Plant; and to

Provide for an assessment of those allegations and concerns that question Diablo Canyon criticality readiness, prior to a Commission consideration of restoration of the license for reactor criticality and low power (less than 5%) testing; and to

Provide for an assessment of those allegations and concerns that question plant readiness for power ascension testing and full power operations, prior to a Commission consideration of this issue.

### II. Scope

The Diablo Canyon Allegation Management Program is intended to encompass all allegation, or expressions of concern which may be construed as allegation, which pertain to design, construction, operation, and management of safety-related structures, systems, and components, at Diablo Canyon. In this regard, the Allegation Management Program will also address certain concerns raised by Intervenor and members of Congress (e.g. implications of a 1977 audit by Nuclear Services Corporation of a Diablo Canyon Contractor). The program requires that all NRC Offices receiving new Diablo Canyon allegations forward those allegations to the Allegation Management Staff in a timely manner.

### III. Methodology/Approach

The Diablo Canyon Allegation Management Program requires the combined efforts of NRC offices to identify all allegations upon receipt and coordinate resolution of the allegations with the Diablo Canyon Allegation Management Staff. The Diablo Canyon Allegation Management Staff is a coordination group made up of representatives of Region V, NRR, IE and ELD, as identified in Attachment 1.

The Allegation Management Program requires development, updating and maintenance of a comprehensive listing of allegations related to Diablo Canyon and provides for a coordinated assessment and resolution. The management program is not intended to circumvent any other established NRC management program (e.g. the Allegation Tracking System) or relieve

any NRC office of its normal organizational and technical responsibilities. To the contrary, the Allegation Management Program is intended to complement and coordinate the activities of the NRC Offices as they relate to Diablo Canyon allegations.

The Allegation Management Program includes the following elements:

- (1) Development of a comprehensive listing of Diablo Canyon allegations. The format for the listing is provided in Attachment 2. The distribution of the actual list is controlled and limited.
- (2) Use of procedures to maintain anonymity and confidentiality of allegeders when requested.
- (3) Confirmation with the allegeder (where possible and appropriate) that the NRC has an accurate understanding of the concern.
- (4) Definition of an action plan for each allegation which provides an approach to resolution. The action plan shall include such items as: technical approach to resolution; identification of lead/support responsibilities, resource requirements, schedule for completion; and includes an initial assessment of the potential significance of the allegation. The format for an allegation action plan is provided in Attachment 3.
- (5) Responsible Lead Office management review and agreement on the action plan for each allegation.
- (6) Implementation of the action plan.
- (7) Status reporting and preliminary assessments of allegations significance and programmatic implications in time to support Commission consideration of Diablo Canyon licensing actions.
- (8) Feedback to the allegeder, where possible, for further assurance that evaluations accurately address concerns.

#### IV. Schedule

Actions related to Diablo Canyon allegations shall be accomplished in accordance with the following general schedule:

Approval of Allegation Management Program and Individual  
Action Plans

11/23/83



On-site review/inspection effort*	11/28 - 12/9/83
Individual item status/preliminary assessment reports	12/9/83
Pre-criticality project status assessment report	12/19/83
Updated individual item status/assessment reports	(later)
Pre-power ascension Project Assessment Report	(later)

It is anticipated that during the course of this program additional allegations will be received and that findings resulting from the review or inspection of current allegations may require expanded examinations. Accordingly, new individual allegation action plans will be developed and existing plans may be expanded. The thoroughness of NRC evaluations shall not be influenced by the timing of licensing decisions by the Commission. However, full effort shall be made to provide the Commission with as comprehensive and accurate assessments of allegation significance as is possible.

#### V. Protection of Individuals

The identity of persons providing allegations to the NRC shall not be disclosed as a matter of practice. In addition, for those individuals expressly requesting confidentiality all efforts shall be made to protect the individuals identity. This will include: limited and controlled distribution of allegation documentation and correspondence; minimal use of names, identifying titles, or position descriptions in written material; enlarged sampling of activities so that it is not evident to personnel outside the NRC that the particular sample selection is related to the allegor; and other indirect approaches toward investigation/inspection of allegations. During the course of NRC reviews or inspections, similar efforts shall be made to protect the identity of licensee or contractor employees who provide information which may be construed as being critical of licensee or contractor activities.

Receiving, clarifying, evaluating, and documenting allegations may involve direct NRC staff contact with allegors and will involve representation of the allegors concerns in NRC documentation and other communications. These oral and written communications shall be professional and objective in nature and shall not reflect a pre-judgemental or defensive posture on the part of the NRC staff. Further, these communications shall not infer criticism of the allegors' motives, or technical expertise.

\*Technical review, inspection, and investigation activities for many of the allegations have been in progress for some time. The 11/28-12/9/83 on-site review refers to the consolidated team effort to address the bulk of the known allegations.

#### VI. Development and Retention of Supporting Data

An individual record file shall be developed and maintained for each allegation by the lead NRC office. This file will contain or reference pertinent documentation associated with the allegation. Resolution of each allegation shall be supported with a clearly auditable record trail. Accordingly, the record file shall contain or make reference to all significant records relied upon to reach resolution.

Records of personnel interviews shall be developed and retained in those instances where interviews are relied upon by the NRC staff for decisions of technical adequacy. Interview records shall, as a minimum contain: the date, time, location of the interview; the name of the interviewer and interviewee; and a summary of questions asked and relevant information obtained.

Upon issuance of reports which close out allegations, those records which are appropriately referenced in the NRC reports and are traceable through some other means (e.g. meeting transcripts, permanent licensee records, etc.) may be removed from the allegation record file.

#### VII. Special NRC Actions

As addressed in certain allegation action plans, it may be appropriate to initiate actions which are not routinely required for allegation follow-up. These may include: issuing requests for information to the licensee under 10 CFR 50.54 (f), Confirmation of Action letters or orders; or requests to the Department of Justice to grant immunity for certain individuals. Actions such as these, if required, shall be handled in accordance with established NRC procedures.

#### VIII. Manpower Accounting

Offices shall implement established manpower accounting systems to monitor resource expenditures related to this ability.

Diablo Canyon Allegation Management Staff

<u>Organization</u>	<u>Name</u>	<u>Position</u>
Region V	T. W. Bishop	Staff Leader
NRR	G. W. Knighton	Member
IE	R. F. Heishman	Member
ELD	J. Lieberman	Member

# LEGEND FOR JUSTIFICATION

- 1 = The allegation is/is not a specific safety or quality issue or a generalized concern.
- 2 = The staff has/has not previously addressed this issue.
- 3 = The issue has been previously dealt with or is now being dealt with by PG&E.
- 4 = The allegation is/is not a significant safety or concern.
- 22 = SSER 22
- 21 = SSER 21
- IR = Inspection Report

ALLEGATION SOURCE DOCUMENT					ALLEGOR	CHARACTERIZATION				OLD		NEW		
2/2/84	2/22/84	3/2/84	3/2/84	3/23/84						FOLLOW UP	CLOSED	PGA	PGE	MRC
GAP	21	GAP	J1	GAP							(22) 126			
14					STOKES		WELD PROCEDURES AND TECHNIQUES FAILED TO COMPENSATE FOR DRAWING WEARNESS				(22) 92, 93			
15					STOKES		ESD 223 DID NOT REQUIRE JOINTS TO BE WELDED FLUSH FOR FLARE AND BEVEL				(22) 92, 93			
16					STOKES		SPECIFIED WELD ANGLES DID NOT MATCH RELEVANT CODE REQUIREMENTS IN DESIGN COMMITMENTS				(22) 92, 93			
17					STOKES		LACK OF DOCUMENT CONTROL MEANT ESD 223 WAS NOT APPLIED CONSISTENTLY						RV (4) HS not	
18					STOKES		ESD 223 INCLUDED INACCURATE INFORMATION IN THE SKEWED FILLET WELD TABLE				(22) 92, 93, 126			
19					STOKES		QC INSPECTORS COULD NOT READ THE WELDING ANGLE AND EFFECTIVE THROAT SYMBOLS ON DESIGN DRAWINGS						RV (4) HS not	
20					STOKES		QUICK FIX REMOVED WELD SYMBOLS FROM DRAWINGS						(4) HS not NRR	
21					STOKES		MANAGEMENT FAILED TO PROVIDE QC CALIBRATED TOOLS TO MEASURE VISIBLE RADIUS OF FLARE WELDS				(22) 92, 93			
22					STOKES		MRC MAY NOT ACCEPT A CORRECTIVE ACTION PROGRAM				(22) 92, 93			
23					STOKES		CORRECTIVE ACTION HAS BEEN INADEQUATE TO DATE ON BEVEL AND FLARE BEVEL WELDS				(22) 92, 93			
24					STOKES		CORRECTIVE ACTION FOR SKEWED FILLET AND GROOVE WELDS REMAINS INADEQUATE				(22) 92, 93			

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2/2/84	2/22/84	3/2/84	3/2/84	3/23/84			FOLLOW UP	CLOSED	PG&E	PGE	NRC
GAP	JI	GAP	JI	GAP							
		300			ANONY- MOUS	PG&E MANAGEMENT VERBAL 1983 POLICY WAS THAT FIELD ENGINEERS SHOULD IGNORE ALL PROBLEMS WITH OVIDs					RV(2) has not NRR
		301			ANONY- MOUS	PLANT DESIGN DOES NOT REALISTICALLY ACCOUNT FOR THE FULL EFFECT FROM TEMPERATURE VARIATIONS					
				1	HUDSON	THE INSPECTOR EXAMINED THE 90 DAY WELDERS LOG AND FOUND THAT NO VOID EXISTED BETWEEN 8/72 AND 12/72		(22)68 IR 83-37			
				2	HUDSON	PULLMAN AND PG&E CONTENT THAT "NONDESTRUCTIVE EXAMINATION" (NDE) PERSONNEL HAVE BEEN QUALIFIED SINCE AT LEAST 1974		(22)57 IR 83-37			
				3	HUDSON	PG&E AND PULLMAN CLAIM THAT ADEQUATE BACKUP DATA EXISTS TO DEMONSTRATE THAT NDB PERSONNEL ARE QUALIFIED BASED ON TRAINING AND EXPERIENCE		(22)57 IR 83-37			
				4	HUDSON	NDE EXAMINER PERFORMED MTE WELD TESTS, 314 IN FOUR DAYS				(4) is not	
				5	HUDSON	NDE TECHNICIANS CERTIFIED LEVEL II WITHOUT PROPER QUALIFICATIONS				OI(4) is not	
				6	HUDSON	A BLANK WELD PROCESS SHEET WAS SIGNED AND THEN DUPLICATED FOR USE				OI (4) is not	
				7	CLEWETT	PG&E DEFENDED PULLMAN'S PRACTICE OF WELDING ON WATER FILLED PIPES		(22) 132			
				8	CLEWETT	PG&E HAS OVERLOOKED THE FACT THAT CRACKS OCCUR WHEN WELDING WATER FILLED PIPES		(22) 132			
13					STOKES	INEFFICIENT DESIGN DRAWINGS CAUSED ENGINEERS TO USE DIFFERENT ASSUMPTIONS (1.5T vs 2T vs 3T)					RV(4) is not



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GAP	JI	GAP	JI	GAP							
		289			STOKES	ENGINEERS WERE INSTRUCTED TO INDICATE THAT SEISMIC DESIGN REVIEW CALCULATIONS WOULD NOT AFFECT THE FSAR					INRR(2) has not
		290			STOKES	CALCULATIONS THAT CALLED FOR FIELD MODIFICATIONS WERE ALTERED WITHOUT APPROVAL OF THE ORIGINATOR					INRR(2) has not
		291			STOKES	MULTIPLE ENGINEERS INDEPENDENTLY PRODUCED PRELIMINARY CALCULATIONS ON THE SAME HANGERS, ALLOWING MANAGEMENT TO PICK AND CHOOSE					INRR(2) has not
		292			STOKES	MANAGEMENT POLICY WAS THAT ENGINEERS IN SEISMIC DESIGN REVIEW WERE NOT TO ANSWER QUESTIONS RAISED BY NRC					IOI (2) has not
		293			STOKES	MANAGEMENT INTIMIDATION OF ALIENS HELPED TO ENFORCE QUESTIONABLE DESIGN PRACTICES					IOI (2) has not
		294			ANONY- MOUS	PRE-INSPECTION ENGINEERS DID NOT HAVE ADEQUATE TIME TO FIND AND CORRECT PROBLEMS ON HANGERS					IOI (2) has not
		295			ANONY- MOUS	UNTIL FEBRUARY 15, 1994, PRE-INSPECTION ENGINEERS DID NOT HAVE AUTHORITY TO LOOK AT WORK ALREADY ACCEPTED, REGARDLESS OF DEFICIENCIES					RV (2) has not
		296			ANONY- MOUS	BECHTEL MANAGEMENT DISPLAYED DISREGARD FOR PROFESSIONAL CODES					RV (2) has not
		297			ANONY- MOUS	BECHTEL MANAGEMENT PRACTICE COMPROMISES THE LICENSEE'S RECORD ON QUALITY ASSURANCE					RV (2) has not
		298			ANONY- MOUS	INACCURATE DRAWINGS MEAN THAT OPERATORS MAY RELY ON INFORMATION THAT CONFLICTS WITH THE APPROVED DESIGN					RV (2) has not
		299			ANONY- MOUS	DRAWINGS THAT WILL BE RELIED ON BY OPERATORS ARE INCOMPLETE					RV (2) has not



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2/2/84	2/22/84	3/2/84	3/2/84	3/23/84			FOLLOW UP	CLOSED	PG&E	PGE	NRC
GAP	JI	GAP	JI	GAP							
		278			STOKES	WHEN ASSUMPTIONS OR LOADS WERE CHANGED FOR PRELIMINARY CALCULATIONS ON PIPE SUPPORTS THAT PREVIOUSLY HAD FAILED, NO ONE RECEIVED OR CHECKED THE ENTIRE CALCULATION					NRR(2) has not
		279			STOKES	A BECHTEL OFFICIAL APPROVED THE SEISMIC REVIEW CALCULATIONS EN MASSE OVER SEVERAL DAYS WITHOUT STUDYING AND PROPERLY REVIEWING THE WORK					NRR(2) has not
		280			STOKES	MANAGEMENT DID NOT HAVE NECESSARY DOCUMENTS FROM VENDORS TO GUIDE CALCULATIONS REQUIRED OF VENDOR PURCHASES FOR STRUCTURAL STEEL SUPPORTS					NRR(2) has not
		281			STOKES	MANAGEMENT DID NOT SEND DRAWING DETAILS AND SUPPORT CONDITIONS TO VALVE MANUFACTURERS AND OTHER VENDORS FOR APPROVAL					NRR(2) has not
		282			STOKES	MANAGEMENT'S PRODUCTION SCHEDULE FOR SEISMIC DESIGN REVIEW WAS TOO RIGOROUS					NRR(2) has not
		283			STOKES	ENGINEERS APPROVED HANGERS SOLELY ON THE BASIS OF CONCLUSIONS IN FILE 049243 FOR SIMILAR PIPE SUPPORTS					NRR(2) has not
		284			STOKES	BECAUSE SITE ENGINEERS HAD TO WAIT UP TO A WEEK TO OBTAIN INFORMATION FROM S.F. OFFICE, DECISIONS WERE MADE WITHOUT NECESSARY INFORMATION					NRR(2) has not
		285			STOKES	THERE WAS NO SYSTEM USED TO VERIFY ACCURACY OF INFORMATION OBTAINED FROM SAN FRANCISCO OFFICE ON TELEPHONE					NRR(2) has not
		286			STOKES	AT TIME OF STOKES DEPARTURE, OPERATORS DID NOT HAVE ACCESS TO CENTRAL DOC. CENTER WITH INFO. NECESSARY TO RESPOND TO PLANT CONDITIONS	RV 52 (21) 34				
		287			STOKES	STOKES REPORTED ERRORS IN TEP M-9 COMPUTER ANALYSIS, WHICH INCORRECTLY INSTRUCTED ENGINEERS IN MAKING CALCULATIONS					NRR(2) has not
		288			STOKES	THE CALCULATIONS USED TO OVERRULE THOSE REJECTING PIPE SUPPORTS WERE LESS SOPHISTICATED THAN THE ORIGINAL CALCULATIONS					NRR(2) has not

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2/2/84	2/22/84	3/2/84	3/2/84	3/23/84			FOLLOW UP	CLOSED	PG&E	PGE	NRC
GAP	J1	GAP	J1	GAP							
		267			STOKES	QUESTIONABLE CONSERVATIVE BASIS FOR SEISMIC DESIGN REVIEW (DOCUMENT 049243)					NRR(2) has not
		268			STOKES	ANALYSIS ME-101 FOR SEISMIC DESIGN REVIEW DOES NOT REPRESENT CONSERVATIVE ENGINEERING STANDARDS "IN MANY CASES"					NRR(2) has not
		269A			STOKES	MANAGEMENT DID NOT FREELY DISTRIBUTE PROFESSIONAL CODES THAT SUPPOSEDLY PARALLELED COMPUTER ANALYSES RELIED ON BY ENGINEERS IN THE SEISMIC DESIGN REVIEW					NRR(2) has not
		269B			STOKES	M-9 COMPUTER ANALYSIS FOR ANGLES OMITTED AISC PROVISION FOR ALLOWABLE BENDING STRESS, CONTRARY TO LICENSING COMMITMENTS					NRR(2) has not
		271			ANONYMOUS	MANAGEMENT OFFICIALS OVERRULED ENGINEERS WHO ATTEMPTED TO CALCULATE EFFECTS AND STRESSES OF TORSIONAL LOADS CREATED ON PIPE SUPPORTS DURING INSTALLATION					NRR(2) has not
		272			STOKES	MANAGEMENT IMPOSED INCONSISTENT STANDARDS FOR MODIFICATIONS IN THE SEISMIC DESIGN REVIEW					NRR(2) has not
		273			STOKES	BECHTEL ISSUED OUT-OF-DATE COMPUTER STRUDL MANUALS TO ENGINEERS IN THE SEISMIC DESIGN REVIEW					NRR(2) has not
		274			STOKES	ENGINEERS IN THE STRESS GROUP RELIED ON OUTDATED SEISMIC DATA THAT WAS NECESSARY FOR THEIR CALCULATIONS					NRR(2) has not
		275			STOKES	BECHTEL'S COMPUTER PROGRAM DID NOT HAVE AN ADEQUATE "MEMORY" FOR ENGINEERS TO CONDUCT FULL ANALYSES OF COMPLEX HANGERS					NRR(2) has not
		276			STOKES	THERE WAS NO CONSISTENT PROCEDURE OR CRITERION TO GUIDE ENGINEERS WHO CHECKED CALCULATIONS IN THE SEISMIC DESIGN REVIEW					NRR(2) has not
		277			STOKES	MANAGEMENT DIRECTED A PURGE OF FILES TO REMOVE ANY EVIDENCE OF PREVIOUSLY DESTROYED OR CENSORED WORK FROM ENGINEERS WHO FAILED HANGERS BUT WERE LATER OVERRULED					NRR(2) has not

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2/2/84	2/22/84	3/2/84	3/2/84	3/23/84			FOLLOW UP	CLOSED	PG&E	PGE	NRC
GAP	JI	GAP	JI	GAP							
		256			STOKES	QUALITY OF REVIEW PROCESS QUESTIONABLE BECAUSE ASSUMPTION SHEETS NOT INCLUDED IN FINAL CALCULATIONS IN SEISMIC DESIGN REVIEW		(22) 55 et al.			
		257			STOKES	PG&E RESPONSE TO NRC ON SMALL BORE PIPING ANALYSIS DOES NOT CONTAIN ENOUGH INFORMATION TO SUPPORT A CONCLUSION		(22) 55 et al.			
		258			STOKES	CONCLUSIONS OF PG&E IS JANUARY 27, 1984 RESPONSE TO NRC ON EXPANSION ANCHORS ARE BASED ON INCOMPLETE, INCONSISTENT DATA		(22) 55 et al.			
		259			ANONY- MOUS	THE RELIABILITY OF THE SEISMIC DESIGN REVIEW IS HAMPERED BY ITS RELIANCE ON DEFICIENT DATA FROM APPARENTLY UNQUALIFIED PERSONNEL DURING 81/82 WALKDOWN OF PLANT					NRR
		260			ANONY- MOUS	ESSENTIAL INFORMATION FOR REVIEW CALCULATIONS FOR DESIGN VERIFICATION WERE REMOVED FROM DRAWINGS		(22) 55 et al.			
		261			ANONY- MOUS	NO ROOM FOR MOVEMENT WITH ATTACHMENTS AND BASEPLATES OBSERVED AS A GENERIC PROBLEM					NRR (2) has
		262			ANONY- MOUS	SEISMIC DESIGN REVIEW FAILED TO ACCOUNT FOR EXTRA RESIDUAL STRESS FROM OVER WELDING					NRR (2) has not
		263			ANONY- MOUS	SEISMIC DESIGN REVIEW MAY HAVE FAILED TO COMPENSATE FOR THE EFFECTS OF THE WELD SYMBOL BREAKDOWN		(22) 92-93, 126			
		264			STOKES	ENGINEERS IN THE SEISMIC DESIGN REVIEW DID NOT HAVE WRITTEN PROCEDURES TO GUIDE THEIR USE OF STRUDI. COMPUTER PROGRAM					NRR(2) has not
		265			STOKES	ENGINEERS IN THE STRESS GROUP WERE TRANSFERRED AFTER CHALLENGING SUSPECT CHANGES IN THE MODELS FOR REVIEW CALCULATIONS					NRR(2) has not
		266			STOKES	INADEQUATE RECORDS OF HANGER CALCULATIONS REQUIRE EXPANDED SAMPLING BY SEISMIC DESIGN REVIEW					NRR(2) has not

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GAP	JI	GAP	JI	GAP							
		245			ANONY- MOUS	1983 PG&E REFORM COMMITMENTS ON WELD SYMBOLS WERE INACCURATE IN FACT, & DEMONSTRATED A LACK OF UNDERSTANDING ABOUT THE PROBLEM		(22) 92-93, 126			
		246			ANONY- MOUS	PG&E'S REFORM COMMITMENTS HAVE NOT BEEN APPLIED TO THE FIELD THROUGH AN ON-SITE TRAINING PROGRAM FOR THE ENGINEERS		(22) 92-93, 126			
		247			ANONY- MOUS	PG&E DID NOT SPECIFY WHEN PREHEATING WAS REQUIRED FOR WELDING		(22) 126			
		248			ANONY- MOUS	THE QUICK FIX PROGRAM WAS USED TO THWART QC INSPECTORS WHO RAISED PROBLEMS WITH WELD SYMBOLS WHEN THEY REFUSED TO SIGN FOR WELDS THEY COULD NOT READ SYMBOLS FOR					NRR(2) has not
		249			ANONY- MOUS	IN 1983 PG&E MANAGEMENT CORRECTED EXAMPLES OF A GENERIC DEFICIENCY BUT REFUSED TO RECOGNIZE THE REPORT ON THE BASIC PROBLEM		(22) 126			
		250			ANONY- MOUS	PG&E MANAGEMENT'S RATIONALIZATION TO THE NRC STAFF, THAT DEFECTIVE WELDS ARE UNNECESSARY, HAS UNTENABLE GENERIC IMPLICATIONS		(2) has			
		251			ANONY- MOUS	CERTAIN "UNNECESSARY" WELDS ARE VITAL TO THE SAFETY OF PLANT EQUIPMENT		(2) has			
		252			ANONY- MOUS	A CURRENT ENGINEER AT DIABLO CANYON CHARACTERIZED PG&E'S FEBRUARY 7 RESPONSE (DCL-80-040) TO A JANUARY 19 NRC AUDIT EXIT INTERVIEW AS BEING FALSE		(22) 92-93, 126			
		253			ANONY- MOUS	IN ITS FEBRUARY 7 RESPONSE TO THE NRC STAFF, PG&E MAY HAVE SUBMITTED KNOWINGLY FALSE STATEMENTS ON WELD SYMBOLS		(22) 92-93, 126			
		254			ANONY- MOUS	ON FEBRUARY 21, FIELD ENGINEERS RECEIVED A PG&E MANAGEMENT MEMORANDUM, THAT PREINSPECTORS COULD CHANGE WELD SYMBOLS TO ASSURE COMPLIANCE WITH AWS A 2.4		(22) 92-93, 126			
		255			STOKES	EFFECTIVE CORRECTIVE ACTION TO VERIFY THE SIZE OF SKEWED FILLET AND GROOVE WELDS HAS NOT BEEN IMPLEMENTED		(22) 92-93, 126			



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GAP	JI	GAP	JI	GAP							
		234			STOKES	QC INSPECTORS COULD NOT READ SYMBOLS AND INSTRUCTIONS ON THE DESIGN DRAWINGS BECAUSE THEY WERE NOT CONSISTENTLY QUALIFIED TO THE AWS CODE AND NOT ISSUED THE SYMBOLS CODE	(22)	92, 93, 126			
		235			ANONY- MOUS	UNTIL FEBRUARY, 1984, NEITHER THE DESIGN ENGINEERS, CONSTRUCTION NOR THE CONTRACTOR USED A UNIFORM SYSTEM OF WELD SYMBOLS	(22)	92-93, 126			
		236			ANONY- MOUS	IN SOME CASES, THERE WAS NO DESIGN GUIDANCE FOR WELDING IN THE FIELD DUE TO THE LACK OF SYMBOLS FOR WELDING REQUIRED BY THE DRAWINGS	(22)	92-93, 126			
		237			ANONY- MOUS	FIELD ENGINEERING PERSONNEL ARE CONSISTENTLY UNTRAINED AND ARE NOT CONSISTENTLY KNOWLEDGEABLE ABOUT WELD SYMBOLS				(2) has	
		238			ANONY- MOUS	INCONSISTENT INTERPRETATION OF WELD SYMBOLS IN PART WAS DUE TO RELIANCE ON AN ORAL TRADITION, INSTEAD OF DOCUMENTED INSTRUCTIONS	(22)	92-93, 126			
		239			ANONY- MOUS	THE STANDARD OPERATION ON-SITE WAS TO ASSUME THAT SAFETY-RELATED WELDING WAS DONE PROPERLY, EVEN WHEN SYMBOLS DID NOT PROVIDE CORRECT INSTRUCTION	(21) 86, 87 (22) 92-93, 126				
		240			ANONY- MOUS	THE WORD "TYPICAL" HAS BEEN UTILIZED TOO EXTENSIVELY IN VARIOUS INTERPRETATIONS				(2) has	
		241			ANONY- MOUS	THE WELD SYMBOL BREAKDOWN RESULTED IN OVERSIZED WELDS THAT CAN ALSO COMPROMISE SAFETY	(22)	126, 127, 129			
		242			ANONY- MOUS	ANOTHER EFFECT OF WELD SYMBOL BREAKDOWN ARE DRAWINGS THAT MAKE IMPOSSIBLE CLAIMS ABOUT WELDS, MEANING AS-BUILT CONDITION IS INDETERMINATE	(22)	126			
		243			ANONY- MOUS	PG&E MANAGEMENT'S RESPONSE TO FIELD ENGINEERS INITIATIVES TO CORRECT WELD SYMBOL DEFICIENCIES INCLUDED DEMOTION; TRANSFERS; AND ORDERS TO STOP	(22)	126			
		244			ANONY- MOUS	IN 1983, MANAGEMENT FAILED TO PROCESS IN WRITING MINOR VARIATION REPORTS (MVR) ON WELDING	(22)	126			

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GAP	JI	GAP	JI	GAP							
		223			STOKES	THE QUICK FIX PROGRAM SUBSTITUTED INFORMAL REPAIRS FOR CONTROLLED CORRECTIVE ACTION THROUGH THE FORMAL NONCONFORMANCE SYSTEM					INRR(2) has not
		224			STOKES	MANAGEMENT OFFICIALS ARBITRARILY LIMITED THE SCOPE OF THE QUICK FIX PROGRAM WHEN PREINSPECTION "ENGINEERS TRIED TO USE IT AS A SOLUTION TO QUALITY DEFICIENCIES"					INRR(2) has not
		225			STOKES	BECAUSE OF DEFICIENT DESIGN DRAWINGS FOR WELDING, THE VARIOUS DEPARTMENTS MADE DRASTICALLY INCONSISTENT ASSUMPTIONS ABOUT WELD PENETRATION		(22) 92-93, 126			
		226			STOKES	ASSUMPTIONS USED BY THE SAN FRANCISCO OFFICE TO DESIGN BEVEL AND FLARE BEVEL WELDS FOR TUBE STEEL WERE INACCURATE AND COMPROMISE CLAIMS THAT THE DESIGN IS CONSERVATIVE		(22) 126			
		227			STOKES	WELD PROCEDURES AND TECHNIQUES FAILED TO COMPENSATE FOR INACCURATE DESIGN DRAWINGS		(22) 126			
		228			STOKES	ESD-223 DID NOT REQUIRE JOINTS FOR BEVEL AND FLARE BEVEL WELDS TO BE FLUSH		(22) 126			
		229			STOKES	MR. STOKES AND OTHER WITNESSES HAVE OBSERVED BEVEL AND FLARE BEVEL WELDS THAT WERE NOT FLUSH		(22) 92-93, 126			
		230			STOKES	THE ANGLES SPECIFIED IN PULLMAN WELD PROCEDURES AND TECHNIQUES DID NOT MATCH THE RELEVANT CODE REQUIREMENTS IN DESIGN COMMITMENTS		(22) 92-93, 126			
		231			STOKES	QC INSPECTORS DID NOT RECEIVE CALIBRATED TOOLS TO MEASURE THE VISIBLE RAD II OF BEVEL & FLARE BEVEL WELDS ON AN AS-BUILT BASIS		(22) 92-93, 126			
		232			STOKES	THE CURRENT QC CORRECTIVE ACTION PROGRAM FOR WELD DESIGN DEFICIENCIES DOES NOT COMPENSATE FOR PAST MISTAKES		(22) 92-93, 126			
		233			STOKES	AS OF MR. STOKES'S OCTOBER 15, 1983 DEPARTURE, CORRECTIVE ACTION WAS INADEQUATE FOR INACCURATE DESIGN DRAWINGS ON BEVEL AND FLARE BEVEL WELDS		(22) 92-93, 126			



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GAP	J1	GAP	J1	GAP							
		212	212		ANONY- MOUS	MR. KARNER TORE UP A DCN THAT A QC INSPECTOR HAD WRITTEN TO PROTEST HARASSMENT BY SUPERINTENDENT RICH BABINEAU					01 (4) is not
		213	213		ANONY- MOUS	WHEN SOME QC INSPECTORS WERE TESTED TO BE CERTIFIED FOR WELD INSPECTIONS THE ANSWERS TO THE TESTS WERE LYING ON THE TABLE					01 (4) is not
		214	214		ANONY- MOUS	PG&E HAS ATTEMPTED TO MINIMIZE ACCOUNTABILITY BY ESTABLISHING A POLICY OF DOCUMENT DESTRUCTION AND CREATION OF SANITIZED RECORDS				(2) has	is not
		215			ANONY- MOUS	THE PLANT IS BEING DESIGNED AND BUILT THROUGH MEMORANDA RATHER THAN UNDER CONTROLLED PROCEDURES (SEE #8)					NRR/01
		216			UNKNOWN	MANAGEMENT INSTRUCTED A DESIGN ENGINEER TO APPROVE PIPE SUPPORT REVISIONS MARKED ON AS-BUILT DRAWINGS WITHOUT THE BENEFIT OF AN ANALYSIS					NRR(2) has not
		217			STOKES	MANAGEMENT KEPT PERSONNEL PARTICIPATING IN THE QUICK FIX PROGRAM IGNORANT OF THE GROUND RULES					NRR(2) has not
		218			STOKES	A QUICK FIX MEMO DID NOT SUCCEED IN CLEARING UP CONFUSION, BECAUSE IT MISSED MORE OF THE PROGRAM THAN IT COVERED					NRR(2) has not
		219			STOKES	IN JUNE, 1983 MEMO, MANAGEMENT DIRECTED THAT PSDTC'S "ARE TO BE TREATED IN THE SAME MANNER AS THE ORIGINAL 'APPROVED FOR CONSTRUCTION' DRAWING"					NRR(2) has not
		220			STOKES	ALTHOUGH QUICK FIXES WERE SUBJECT TO LATER REVIEW, MANAGEMENT REPRESENTATIVES TOLD MR. STOKES THAT THE FINDINGS WERE ACCEPTED AT A 98% RATE					NRR(2) has not
		221			*STOKES	THE UNCONTROLLED QUICK FIX AUTHORITY WAS ABUSED					NRR(2) has not
		222			STOKES	THE QUICK FIX PROGRAM IMPROPERLY SUBSTITUTED FOR THE FORMAL DESIGN AND CONSTRUCTION QA REPORTING SYSTEM THROUGHOUT THE PROGRAM FOR HANGERS					NRR(2) has not

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GAP	JI	GAP	JI	GAP							
		201	201			NUMBER SKIPPED					
		202	202		ANONY- MOUS	HOLDS DRILLED BY BOSTROM-BERGEN AND AMERICAN BRIDGE DID NOT MATCH THE DESIGN DRAWING. PULLMAN QC INSPECTORS CONCERN WAS REBUKED			(2) has		
		203	203		ANONY- MOUS	FAULTY QC FOR PAINT AND OTHER PROTECTIVE COVERING	NRR (22) 100				
		204	204		ANONY- MOUS	ADDITIONAL ADVERSE IMPACT OF FAULTY QUALITY CONTROLLED PAINT JOB (SEE ABOVE)	NRR (22) 100				
		205	205		ANONY- MOUS	PG&E HAD NO QC PROGRAM FOR PAINT JOB BEFORE 12/83	NRR (22) 100				
		206	206		ANONY- MOUS	PLANT SPEC USED BY PAINT FOREMAN DID NOT CONFORM TO THAT OF THE RECORDS DEPARTMENT	NRR (22) 100				
		207	207		ANONY- MOUS	CORRECTIVE ACTION FOR QC PAINT VIOLATIONS HAD BEEN PROSPECTIVE ONLY	NRR (22) 100				
		208	208		ANONY- MOUS	QUALITY OF AN UNKNOWN PERCENTAGE OF PAINT AND OTHER PROTECTIVE COATINGS IS INDETERMINATE	NRR (22) 100				
		209	209		ANONY- MOUS	NO EVIDENCE OF ANY EFFORTS BY PG&E TO ASSESS SAFETY SIGNIFICANCE OF THE NON-EXISTENCE OF ANY QUALITY CONTROL FOR PAINT	NRR (22) 100				
		210	210		ANONY- MOUS	PAINT INSPECTORS HAVE NOT BEEN INSTRUCTED THAT THEY CAN WRITE A NON-CONFORMANCE REPORT (NCR)	NRR (22) 100				
		211	211		ANONY- MOUS	A QC INSPECTOR WAS TOLD HE COULD NO LONGER BE ALLOWED TO OCCASIONALLY ACT AS A TEMPORARY LEADMAN, BECAUSE HE WAS NOT SUFFICIENTLY "PRODUCTION ORIENTED"					(4)01 is not

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GAP	JI	GAP	JI	GAP							
		190	190		ANONY- MOUS	THE ABOVE INDIVIDUAL WAS TRANSFERRED TO A FABRICATION SHOP FROM A WELDER POSITION				(4) is not OI	
		191	191		ANONY- MOUS	THE ABOVE INDIVIDUAL WAS LAID OFF DESPITE HIS FOREMAN'S REQUEST TO KEEP HIM				(4) is not	
		192	192		ANONY- MOUS	PG&E MAY HAVE RECEIVED STAINLESS STEEL THAT ARE OUT OF COMPLIANCE WITH RELEVANT CODE DUE TO A 12/9/83 PURCHASE ORDER ERROR				(4) is not	
		193	193		ANONY- MOUS	THE STEEL RECEIVED FROM THE ABOVE PURCHASE ORDER WILL CAUSE WELDED JOINTS BE SUSCEPTIVE TO CORROSION				(4) is not	
		194	194		ANONY- MOUS	THE ABOVE PURCHASE ORDER ERROR HAS NOT YET BEEN CORRECTED PRIOR TO OPERATION				(4) is not	
		195	195		ANONY- MOUS	PG&E BORROWED THREE CLASS ONE STEEL PLATES FROM PULLMAN TO COVER A TRENCH	(22) IR 82-01				
		196	196		ANONY- MOUS	PULLMAN QC MANAGER CONVINCED INSPECTOR TO ACCEPT THE ABOVE PLATES	(22) IR 82-01				
		197	197		ANONY- MOUS	PULLMAN QC MANAGER UNSATISFACTORILY DISPOSITIONED A DCN OF UNMARKED TOOLS USED ON STAINLESS STEEL				(4) is not	
		198	198		ANONY- MOUS	PULLMAN CQ LEADMAN ORDERED THE INSPECTOR TO REMOVE HOLD TAG ON WORK DONE ON STAINLESS STEEL WITH UNMARKED TOOLS (SEE ABOVE)				(4) is not OI	
		199	199		ANONY- MOUS	PULLMAN MANAGER NEVER RESPONDED TO AN INSPECTOR'S MEMO ABOUT A POTENTIALLY WIDESPREAD PROBLEM WITH BASEPLATES MOUNTED OVER CONCRETE WITH VOIDS	(22) 190				
		200	200		ANONY- MOUS	PULLMAN QC MANAGER CENSORED DR TO REMOVE ALL REFERENCES TO TWO OF THE THREE UNQUALIFIED MATERIALS USED	(22) 109, 110				

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GAP	JI	GAP	JI	GAP							
		179	179		ANONY- MOUS	PULLMAN QA MANAGER FIRED THE INSPECTOR WHO PURSUED THE ABOVE PROBLEM	(22) 130 OI				
		180	180		ANONY- MOUS	REVISED PULLMAN ESD223 ALLOWS EXTRA WELDINGS NOT REQUIRED BY THE DESIGN, THUS CREATED UNACCOUNTED RESIDUAL STRESS				(2) has	
		181	181		ANONY- MOUS	THE ABOVE REVISION SUGGESTS QA STANDARDS HAVE COLLAPSED				(2) has	
		182	182		ANONY- MOUS	PG&E ACCEPTED THE ABOVE REVISION OF PULLMAN				(2) has	
		183	183		ANONY- MOUS	PG&E ACCEPTED WELDS THAT FAILED MT				(2) has	
		184	184		ANONY- MOUS	PG&E DIRECTED PULLMAN TO ACCEPT WELDS THAT WERE NOT TESTED PROPERLY				(2) has	
		185	185		STOKES	WELD PROCEDURES ARE NOT APPLIED CONSISTENTLY				(2) has	
		186	186		STOKES	IGNORANCE OF INSTALLATION PROCEDURES DUE TO MANAGEMENT POLICY				(2) has	
		187	187		ANONY- MOUS	PULLMAN QC MANAGER PROHIBITED INSPECTORS CHECKING A-490 BOLTS CARBON CONTENT SPECIFICATION WHICH IS NOT PART OF INSPECTOR'S JOB				(4) is not	
		188	188		ANONY- MOUS	PULLMAN QC MANAGER FIRED AN INSPECTOR WHO HAD PROTESTED THAT CERTAIN WELDS WERE NOT ADEQUATELY PREPARED FOR MAGNETIC PARTICLE TESTING				(4) is not	
		189	189		ANONY- MOUS	AN INDIVIDUAL PREVIOUSLY FIRED FOR COMPLAINING ABOUT IMPROPER NDE PRACTICE WAS HARRASSED WHEN HE TRIED TO QUALIFY AS A WELDER IN THE PULLMAN TEST BOOTH				(4) is not OI	

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GAP	J1	GAP	J1	GAP			UP				
168					COOPER	AFTER COOPER INFORMED MANAGEMENT IN 1981 THAT RHR PUMP FAILURES HAD BEEN OCCURRING AT OTHER PLANTS, HE WAS SENT AWAY				(4) is not	OI
169					COOPER	PG&E CONTENTION THAT THIS SYSTEM (RHR) IS NOT SAFETY RELATED IS INCORRECT (BASED ON IMI)				(4) is not	
170					COOPER	PG&E OFFICIALS FAILED TO CORRECT A FALSE STATEMENT TO NRC THAT THE COMPANY WAS IGNORANT OF INACCURACIES IN IT'S PLANT MANUAL FOR OPERATORS		(4) is not			
		171	171		ANONY-MOUS	PULLMAN DOES NOT COMPLY WITH AWS SYMBOL CONVENTION FOR WELD GRINDING		(22) 92, 93 126			
		172	172		ANONY-MOUS	PULLMAN MANAGEMENT INSTRUCT INSPECTORS TO VIOLATE CONTRACT SPECIFICATION BY STAMPING ON THE WELD BECAUSE IT WAS NOT PROHIBITED				(4) is not	
		173	173		ANNOY-MOUS	PG&E ACCEPTED OUT-OF-CODE PRACTICE OF A FILLET WELD		(21) 92, 93 (22) 126			
		174	174		ANNOY-MOUS	PULLMAN INSPECTOR CANNOT CORRECT WELD SYMBOL DEFICIENCIES ON PREVIOUSLY-ACCEPTED WORK ONLY PG&E HAS THAT AUTHORITY		(21) 92, 93 (22) 92, 93, 126			
		175	175		ANNOY-MOUS	FAILED TO IMPLEMENT AWS SYMBOLOLOGY RESULTED IN UNDERSIZED WELDS ON CONTAINMENT LINER STUD WELDING		(22) 103, 104, 105			
		176	176		ANNOY-MOUS	COPPER CHILL BARS WERE USED INSTEAD OF BACKING STRIPS - A PRACTICE NOT ALLOWED BY WPS		(22) 103-119			
		177	177		ANNOY-MOUS	PULLMAN TOOK NO CORRECTIVE ACTION TO THE PROBLEM IDENTIFIED ABOVE		(22) 103-119			
		178	178		ANNOY-MOUS	PULLMAN QA MANAGER REPRIMANDED THE INSPECTOR WHO PURSUED THE ABOVE PROBLEM	(22) 110 101				



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GAP	J1	GAP	J1	GAP							(4) Is not 01
168					COOPER	AFTER COOPER INFORMED MANAGEMENT IN 1981 THAT RHR PUMP FAILURES HAD BEEN OCCURRING AT OTHER PLANTS, HE WAS SENT AWAY					
169					COOPER	PG&E CONTENTION THAT THIS SYSTEM (RHR) IS NOT SAFETY RELATED IS INCORRECT (BASED ON IHI)				(4) Is not	
170					COOPER	PG&E OFFICIALS FAILED TO CORRECT A FALSE STATEMENT TO NRC THAT THE COMPANY WAS IGNORANT OF INACCURACIES IN IT'S PLANT MANUAL FOR OPERATORS		(4) is not			
		171	171		ANONYMOUS	PULLMAN DOES NOT COMPLY WITH AWS SYMBOL CONVENTION FOR WELD GRINDING		(22) 92, 93 126			
		172	172		ANONYMOUS	PULLMAN MANAGEMENT INSTRUCT INSPECTORS TO VIOLATE CONTRACT SPECIFICATION BY STAMPING ON THE WELD BECAUSE IT WAS NOT PROHIBITED		(21) 92, 93 (22) 126			(4) Is not
		173	173		ANNOYMOUS	PG&E ACCEPTED OUT-OF-CODE PRACTICE OF A FILLET WELD		(21) 92, 93 (22) 126			
		174	174		ANNOYMOUS	PULLMAN INSPECTOR CANNOT CORRECT WELD SYMBOL DEFICIENCIES ON PREVIOUSLY-ACCEPTED WORK ONLY PG&E HAS THAT AUTHORITY		(21) 92, 93 (22) 92, 93, 126			
		175	175		ANNOYMOUS	FAILED TO IMPLEMENT AWS SYMBOLOGY RESULTED IN UNDERSIZED WELDS ON CONTAINMENT LINER STUD WELDING		(22) 103, 104, 105			
		176	176		ANNOYMOUS	COPPER CHILL BARS WERE USED INSTEAD OF BACKING STRIPS - A PRACTICE NOT ALLOWED BY WPS		(22) 103-119			
		177	177		ANNOYMOUS	PULLMAN TOOK NO CORRECTIVE ACTION TO THE PROBLEM IDENTIFIED ABOVE		(22) 103-119			
		178	178		ANNOYMOUS	PULLMAN QA MANAGER REPRIMANDED THE INSPECTOR WHO PURSUED THE ABOVE PROBLEM	(22) 110 101				



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ALLEGATION SOURCE DOCUMENT					ALLEGOR	CHARACTERIZATION	OLD			NEW	
2/2/84	2/22/84	3/2/84	3/2/84	3/23/84			FOLLOW UP	CLOSED	PG&E	PGE	NRC
GAP	JI	GAP	JI	GAP							
156					COOPER	ALLEGOR REPRIMANDED FOR DISCLOSING THE POTENTIAL FOR RHR PUMP FAILURE	(21) 42				
157					COOPER	PG&E FAILED TO NOTIFY NRC OF RHR DESIGN DEFECT	(21) 43				
158					COOPER	PG&E REJECTED COOPER'S CHALLENGE OF RHR DESIGN	(21) 42				
159					COOPER	RHR CORRECTIVE ACTION WAS FOR OPERATORS TO LEAVE THE CONTROL ROOM TO MANUALLY OPERATE VALVE BREAKERS TO PROTECT RHR PUMPS	(21) 37-45 (22) 177				
160					COOPER	MANAGEMENT DID NOT SPECIFY AND FOLLOW-UP ACTION TO PREVENT RECURRENCE OF RHR PROBLEM	(21) 44				
161					COOPER	NRC APPROVAL WAS NOT OBTAINED FOR RHR CORRECTIVE ACTION OF MANUAL OPERATOR RESPONSE	(22) 177				
162					COOPER	NO CONTROL FROM ANNUNCIATOR TO ALERT THE OPERATOR WHEN THE RHR PUMPS ARE IN DANGER	(22) 177				
163					COOPER	COOPER DID NOT RECEIVE ANY RESPONSE TO QA VIOLATIONS HE REPORTED ON 1981 SPURIOUS VALVE CLOSURE	(21) 44				
164					COOPER	IT IS IMPOSSIBLE TO DETERMINE THAT REMOVING THE SSPS OUTPUT FUSES WILL CAUSE VALVES 8701 & 8702 TO AUTO CLOSE	(22) 177				
165					COOPER	PG&E FAILED TO MAKE THE OFFICIAL DRAWINGS ACCURATE BY DISCLOSING CIRCUIT CONNECTIONS RESPONSIBLE FOR SPURIOUS CLOSINGS	(21) 41				
166					COOPER	PG&E DOES NOT NOTIFY THE ORIGINATOR OF A DEFICIENCY REPORT THAT A DECISION HAS BEEN REACHED				(4) is not	
167					COOPER	PG&E AND NRC HAVE ERRONEOUSLY CLAIMED THAT THE POSSIBILITY OF SPURIOUS VALVE CLOSURES IS ONLY SIX IN TEN MILLION	(21) 37, 39 40, 45 (22) 177				

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GAP	JI	GAP	JI	GAP							
B145					STOKES	DESIGN DRAWING EXAGGERATED THE LOAD RATINGS OF U-BOLTS UP TO FOUR TIMES THEIR RATING	(22) 85				
B146					STOKES	ANGLE MEMBERS (PIPE SUPPORTS) WERE UP TO FOUR TIMES TOO LONG FOR ALLOWABLE BENDING STRESS	(22) 95 5X				
B147					STOKES	MANAGEMENT DID NOT SUPPLY BLANK DISCREPANCY REPORT FORMS				(4) is not	
B148					STOKES	MANAGEMENT RETALIATED AGAINST THOSE WHO WROTE DISCREPANCY REPORTS					OI
B149					COOPER	PG&E TECHNICIANS "WERE ROUTINELY DENIED ACCESS TO NECESSARY INFORMATION TO PERFORM THEIR JOBS"				(4) is not	
B150					COOPER	PG&E VERBALLY REPRIMANDED THOSE WHO REQUESTED INFORMATION TO DO THEIR JOBS					OI is not
B151					COOPER	TECHNICIANS WERE DENIED CURRENT DRAWINGS AND OTHER REFERENCE MATERIALS				(4) is not	
B152					COOPER	PG&E FOREMAN PURGED THE TECHNICIANS FILES OF UNCONTROLLED DRAWINGS				(4) is not	
B153					COOPER	RHR HOT LEG SUCTION VALVES ARE PRONE TO CLOSURES	(21) 39,40, 45 (22) 177				
B154					COOPER	PG&E AND NRC RATIONALIZATION FOR THE RHR VALVES MISREPRESENTS THE PLANT'S CIRCUITRY	(21) 37,41				
B155					COOPER	PG&E AND NRC MISREPRESENTS THE CIRCUITRY BY CLAIMING RHR PROTECTION THROUGH RELIANCE ON CERTAIN ACTUATORS	(21) 45 (22) 177				

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12/2/84	2/22/84	3/2/84	3/2/84	3/23/84			FOLLOW UP	CLOSED	PG&E	PGE	NRC
GAP	JI	GAP	JI	GAP			(21)79				
A144					STOKES	ENGINEERS DID NOT WORK WITH CONTROLLED DOCUMENTS UNTIL AUGUST 1983	52				
A145					STOKES	MANAGEMENT IDENTIFIED ENGINEERS THAT FAILED PIPE SUPPORTS AND TRANSFERRED THEM FROM THE ASSIGNMENTS	01				
A146					STOKES	ENGINEERING CALCULATIONS THAT FAILED PIPE SUPPORTS WERE DESTROYED	(21)87 52				
A147					STOKES	MANAGEMENT STATED CALCULATIONS WERE BECHTEL PROPERTY AND BECHTEL COULD DESTROY THEM IF THEY WANTED	(22) 87				
A148					STOKES	NEW ENGINEERS ASSIGNED TO CONDUCT ROUTINE REVIEWS FOR ACCURACY OF PREVIOUS WORK PERFORMED COMPLETE REANALYSIS OF FAILED SUPPORTS	(22) 88				
A149					STOKES	HARDWARE WAS REDEFINED THEREBY RECLASSIFYING A DESIGN FLAW AS AN ADDITIONAL FACTOR OF SAFETY	(22) 88				
A150					STOKES	UNDOCUMENTED PIPE SUPPORTS WERE CONSTRUCTED NEAR PREVIOUSLY FAILING SUPPORTS TO REDO THE CALCULATIONS AND PASS THE SUPPORT	(22) 88				
A151					STOKES	MANAGEMENT INSTRUCTED ENGINEERS TO CERTIFY THE MODIFICATIONS DID NOT AFFECT THE FSAR, WITHOUT VERIFYING THE CONCLUSION					NRR/ 01
B142					STOKES	THE DESIGN DRAWINGS INACCURATELY REPRESENTED THE NATURE OF FLARE BEVEL WELDS, WHICH MISLEAD QA INSPECTORS	(22) 92, 93, 126				
B143					STOKES	FLARE BEVEL WELDS DID NOT ACHIEVE FULL PENETRATION	(22) 126				
B144					STOKES	FAILURE TO VERIFY THE PROPER LOCATION OF HILTI-BOLTS	(22) 196				

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12/2/84	12/22/84	1/3/2/84	1/3/2/84	1/3/23/84			FOLLOW UP	CLOSED	PG&E	PGE	NRC
GAP	JI	GAP	JI	GAP							
133	133				HUDSON	PULLMAN TEMPORARILY MADE GOOD OF THREATS TO "GET RID OF" AN INSPECTOR. INSPECTOR WAS CALLED BACK AFTER CONGRESSIONAL HEARINGS ON RETALIATION					01
134	134				UNKNOWN 1/12/84	PULLMAN INSPECTOR FIRED FOR PURSUING A DLN OVER THE OBJECTIONS OF HIS LEADMAN			(22) 120,130 (2)has		
135	135				UNKNOWN 1/12/84	PULLMAN INSPECTORS WERE DENIED RAISES FOR HOLDING UP PRODUCTION FOREMAN AND NOT COOPERATING WITH THE CRAFT			(22) 120,130 (2)has		
136	136				HUDSON	PULLMAN INSPECTORS ARE INTIMIDATED KNOWING THEY CAN BE FIRED FOR DOING THEIR JOB TOO WELL					01
137	137				COOPER	PG&E CONSTRUCTION HAS RELIED ON INTIMIDATION AND RETALIATION TO AVOID CORRECTING REGULATORY VIOLATIONS					(2) has 01
138	138				UNKNOWN 1/12/84	PULLMAN QA MANAGEMENT HAS A PHILOSOPHY OF SCHEDULING IS A HIGHER PRIORITY THAN QUALITY		(22) Bishop Affidavit			
139	139				HUDSON	PULLMAN QA HAD TO MEET ITS SCHEDULE WITH INADEQUATE RESOURCES				(4) is not	
140	140				HUDSON	PULLMAN DEMONSTRATED ANTI-QA PHILOSOPHY BY CIRCUMVENTING PG&E QA PARTICIPATION IN PULLMAN QA PROGRAM ISSUES		(22) 128			
141	141				HUDSON	PG&E QA/QC WAS NOT ANY BETTER THAN PULLMAN'S		(22) 103-119 214-217			
A142					STOKES	ENGINEERS IN THE SEISMIC DESIGN REVIEW PROGRAM ONLY RECEIVED MINIMAL TRAINING	(21)82 52				
A143					STOKES	MANAGEMENT FAILED TO ISSUE CONTROLLED DOCUMENTS FOR ENGINEERS TO USE IN SAMPLE CALCULATIONS	(21)79 52				

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2/2/84	2/22/84	3/2/84	3/2/84	3/23/84			FOLLOW UP	CLOSED	PG&E	PG&E NRC
GAP	J1	GAP	J1	GAP						
122	122				COOPER	PG&E CONSTRUCTION PERSONNEL CAN NOT REPORT VIOLATIONS		(21) 44		
123	123				COOPER	TECHNICIAN NPPR'S REQUIRED FOREMAN APPROVAL				(4) is not
124	124				COOPER	PG&E VOIDED NPPR'S WITHOUT EXPLANATION				(4) is not
125	125				COOPER	CONSTRUCTION PERSONNEL ORDERED NOT TO WRITE NPPR'S				(4) is not
126	126				LOCKERT	LOCKERT COULD NOT RESEARCH PROFESSIONAL STANDARDS			(22) 129	
127	127				HUDSON	PULLMAN QA MANAGER ORDERED HUDSON NOT TO IDENTIFY ANYMORE PROBLEMS				01
128	128				LOCKERT	LOCKERT DISMISSED FOR BEING OUT OF HIS INSPECTION AREA	01		(22) 129	
129	129				UNKNOWN	INSPECTORS VICTIMIZED BY CONSTRUCTION WORKERS		(22) IR 83-29		
130	130				HUDSON	QA MANAGEMENT ENFORCED ILLEGAL POLICIES THROUGH THREATS			(22) 129 (2) had	
131	131				LOCKERT	PULLMAN QA MANAGEMENT THREATENED AN INSPECTOR WITH "LOSS OF HIS JOB" IF HE CONTINUED TO RESEARCH CODES AND STANDARDS AFTER BEING TOLD NOT TO			(22) 129 130	
132	132				UNKNOWN	QA INSPECTOR FIRED FOR BEING "OUT OF HIS ASSIGNED WORK AREA"			(22) 129	
					1/12/84					



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2/2/84	2/22/84	3/2/84	3/2/84	3/23/84			FOLLOW UP	CLOSED	PG&E	PGE
GAP	J1	GAP	J1	GAP						
111	111				UNKNOWN	UNDOCUMENTED ADDITION OF SHIMS UNDERMINES SEISMIC CALCULATIONS		(22) 190		
112	112				UNKNOWN	PROCEDURES UNRELIABLE - COPPER AND STAINLESS TUBING INSTALLATION			(2)(4) has/is not	
113	113				UNKNOWN	RESUBMITTED TEST PROCEDURES QUESTIONABLE (TUBING)			(2)(4) has/is not	
114	114				UNKNOWN	WELDING AND NDE PROCEDURES QUALIFIED AFTER THE FACT QUESTIONABLE			(2)(4) has/is not	
115	115				UNKNOWN	QC TRAINING INADEQUATE		(22) 57, 193		
116	116				UNKNOWN	QC INSPECTOR QUALIFICATIONS INDETERMINATE		(22) 57, 193		
117	117				UNKNOWN	QA MANAGEMENT ROUTINELY CHANGED ACCEPTANCE CRITERIA		(22) 102, 194		
118	118				LOCKERT	NO REJECTION CRITERIA (PIPE RUPTURE RESTRAINT BOLTS)			(22) 181-195 has	
119	119				LOCKERT	QA INSPECTORS NOT PROMPTLY NOTIFIED OF SPECIFICATION CHANGES			(22)181 191-195 (2)has	
120	120				UNKNOWN	PROMPT VIOLATION DISCLOSURE TO NRC IS NOT POSSIBLE		(22) 24, 128		
121	121				UNKNOWN	QC INSPECTORS NOT TRAINED TO REPORT VIOLATIONS		(22) 128, 193, 57		

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2/2/84	2/22/84	3/2/84	3/2/84	3/23/84			UP	CLOSED	PG&E	PGE	NRC
GAP	JI	GAP	JI	GAP							
100	100				HUDSON	PULLMAN'S APPROVED VENDORS LIST IS DEFICIENT IN THAT "MICROSURFACE ENGINEERING" DID NOT HAVE ADEQUATE QA PER MR. HUDSON'S OCTOBER 1981 AUDIT				(22) 121(1) (4) is not	
101	101				HUDSON	EFFECTS OF LACK OF "MICROSURFACE ENGINEERING" QA UPON CALIBRATIONS, TOOLS, AND MEASUREMENTS NOT DETERMINED				(22) 121(2) has	
102	102				HUDSON/ LOCKERT	PG&E HAS STIFLED PULLMAN INSPECTOR'S REPORTS OF FAULTY BOSTROM-BERGEN AND AMERICAN BRIDGE WELDS, BY DIRECTING THEM NOT TO ISSUE DR'S		(2) has (3)			
103	103				UNKNOWN	SHOP WELDS AND HARDWARE OF BOSTROM-BERGEN AND AMERICAN BRIDGE WAS OBVIOUSLY DEFECTIVE		(2) has			
104	104				HUDSON/ LOCKERT	IN 1982 PG&E IMPROPERLY DIRECTED PULLMAN NOT TO INSPECT THESE WELDS DURING THE WALKDOWN PROGRAM		(2) has (3)			
105	105				UNKNOWN 1/16/84	CONTRACTOR FOLEY DID NOT USE RIGHT PARTS (I.E. BEAM CLAMPS)				(22) #43(4) is not	
106	106				UNKNOWN 1/16/84	WRONG SIZE BEAM CLAMPS USED BY FOLEY TECHNICALLY INADEQUATE				(22) #43(4) is not	
107	107				UNKNOWN 1/16/84	NO MATERIAL TRACEABILITY FOR IN-CORE THERMO COUPLES (FOLEY)		(21) #63 (22) #63 & 138			
108	108				UNKNOWN 1/16/84	IN-CORE THERMOCOUPLES MISCLASSIFIED BY FOLEY		(21) #63 (22) #63 & 138			
109	109				UNKNOWN 1/16/84	WORKER THREATENED WITH JOB LOSS WHEN REPORTING 107 & 108				(22) 156 01	
110	110				UNKNOWN 1/16/84	SHIMS TO LEVEL PIPE SUPPORT BASE PLATES UNDOCUMENTED		(22) 190			

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GAP	JI	GAP	JI	GAP							
89	89				HUDSON	PROCEDURES ESD 246 & 247 QUALIFIED AFTER-THE-FACT WITH DIFFERENT EQUIPMENT THAN THAT ORIGINALLY USED		(22) 122 PARA. H			
90	90				HUDSON	PULLMAN INTERNAL AUDIT # 101 WAS DELIBERATELY LEFT OPEN FOR OVER ONE YEAR BY THE SITE QA MANAGER		(22) 124, 122 PARA. J			
91	91				HUDSON	PULLMAN CORPORATE QA DIRECTOR REFUSED TO ADDRESS INTERNAL AUDIT 31 WHICH RAISED THE ISSUE OF EXCESSIVE TIME TO RESOLVE 1A101		(22) 124, 122 PARA. J			
92	92				HUDSON	IN JANUARY 1983 MR. HUDSON WAS REMOVED AS INTERNAL AUDITOR FOR NOT CLOSING ENOUGH AUDITS ALTHOUGH OTHERS WERE THE CAUSE OF DELAY			(1)(c)		
93	93				HUDSON	WHEN INFORMED OF NON-COMPLIANCE WITH 10CFR50 APP. B, MR. KARNER STATED THAT PULLMAN WAS NOT COMMITTED TO APPENDIX B			in no		
94	94				HUDSON	HYDROSTATIC TEST PROCEDURES FOR TESTS BEFORE JANUARY 27, 1975 ARE MISSING DOCUMENTS, PAGES, AND REQUIREMENTS				(2)(4)	has/16
95	95				HUDSON	HYDROSTATIC TEST DOCUMENTATION AFTER 1975 ARE MISSING QA DOCUMENTS (I.E. F78 RELEASE-QC RELEASE)				(2)(4)	has/16
96	96				HUDSON	HYDROSTATIC TEST REQUIREMENTS FORMS DID NOT CONTAIN FLUID TYPE, PRESSURE, AND TEMPERATURE (28 CASES)				(2)(4)	has/16
97	97				HUDSON	IN 28 CASES PULLMAN'S TEST DOCUMENTATION DOES NOT SATISFY PG&E REQUIREMENTS (EXAMPLE USE OF 2485 VS 2812 PSIG)				(2)(4)	has/16
98	98				HUDSON	POST 1978 HYDROSTATIC RETESTS DID NOT ALWAYS HAVE ASSIGNED QC FIELD PIPE RELEASE, DESPITE OTHER RECORDS STATING QC VERIFICATION				(2)(4)	has/16
99	99				HUDSON	MR. HUDSON WAS HARASSED BY MR. KARNER FOR SPEAKING TO THE NRC TOO LONG IN MAY 1982				(2)(4)	has/16

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GAP	JI	GAP	JI	GAP							
67	67				HUDSON	VALVE MEASUREMENTS FROM EQUIPMENT THAT FAILED MINIMUM RELIABILITY STANDARDS WERE IMPROPERLY USED TO ACCEPT VALVES AS SUFFICIENTLY THICK		(22) 121, B			
68	68				HUDSON	ALTHOUGH FORTY-TWO DATA REPORTS DISCLOSED THAT VALVES WERE BELOW MINIMUM THICKNESS, THEY WERE MARKED AS "ACCEPTED WITHOUT EXPLANATION"		(22) 121, B11			
69	69				HUDSON	IN 11 CASES, THE MEASUREMENTS WERE INCOMPLETE, WITH MISSING DATA FOR REQUIRED AREAS OF THE VALVE		(22) 121, B13			
70	70				HUDSON	UIA #34 COULD NOT FIND EVIDENCE THAT ALL REQUIRED VALVES/WELDS WERE EXAMINED AND/OR REPAIRED		(22) 121, B14			
71	71				HUDSON	UIA #34 REPORTED THE LACK OF DOCUMENTATION INDICATING THAT WELD REPAIRS ON THE VALVES WERE NOT CONTROLLED		(22) 121 PARA. C			
72	72				HUDSON	NONE OF THE VALVES MEET AEC AND PG&E DESIGN REQUIREMENTS		(22) 121 PARA. D			
73	73				HUDSON	BECAUSE OF MANAGEMENT'S DECISION NOT TO DEVELOP CORRECTIVE ACTION, THE QUALITY OF THE WELDS MAY BE AS INDETERMINATE NOW AS IN 1972		(22) 121 STAFF POSITION			
74	74				HUDSON	NONDESTRUCTIVE TEST PROCEDURES ALSO LACKED DOCUMENTATION OF PROCEDURE QUALIFICATION RECORDS OR TESTS		(22) 122 PARA. A			
75	75				HUDSON	THE CORRECTIVE ACTION FOR PROCEDURE ESD 234 CONSISTED OF UNRELIABLE, "AFTER THE FACT" PROCEDURE QUALIFICATION TESTS, WHOSE USE WAS NOT CONTROLLED		(22) 122 PARA. A & B			
76	76				HUDSON	IA #101 DID NOT FIND EVIDENCE THAT MANAGEMENT REVIEWED AND APPROVED THE PROCEDURES FOR THE PQT		(22) 122 PARA. B			
77	77				HUDSON	QA MANAGER, HAROLD KARNER DIRECTED THAT THE PROCEDURE QUALIFICATION RECORDS FOR ESD 210 SHOULD BE USED FOR ESD 270		(22) 122 PARA. A			



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GAP	JI	GAP	JI	GAP								
56	56				HUDSON	RECORDS REFLECT QC-ACCEPTED WELDS WHERE NONE EXISTED REMOVAL OF SAFETY-RELATED WELDS WITHOUT QC RECORDS OF THEIR DISAPPEARANCE						(1) Is not
57	57				LOCKERT	WELDS HAVE BEEN REPAIRED WITHOUT REVISING THE RELEVANT DRAWINGS TO NOTE THE DIFFERENCES					(4) Is not	
58	58				UNKNOWN	BECHTEL & PG&E MANAGEMENT MANIPULATED THE UT PROCEDURE TO LOWER THE NUMBER OF REJECTED INDICATIONS IN UT EXAMINATIONS OF FULL PENETRATION WELDS IN 1982				(22) 123, 192 189		
59	59				HUDSON	PULLMAN'S INTERNAL AUDITOR COULD FIND NO EVIDENCE THAT THE ULTRASONIC THICKNESS MEASUREMENT PROCEDURE FOR REACTOR COOLENT PRESSURE BOUNDARY VALVES WAS QUALIFIED		(22)	121 A1, A2			
60	60				HUDSON	PULLMAN'S AUDITOR COULD FIND NO EVIDENCE OF 'PROCEDURE VERIFICATION TESTS' FOR THE TRANSDUCERS		(22)	121, A3			
61	61				HUDSON	IN 1982 PULLMAN'S INTERNAL AUDITOR COULD FIND NO EVIDENCE THAT MANAGEMENT CONDUCTED THE MEASUREMENTS WITH A QUALIFICATION TEST, DESPITE WARNING IN 1983		(22)	121			
62	62				HUDSON	PULLMAN QA MANAGER HAROLD KARNER REFUSED TO TAKE CORRECTIVE ACTION WHEN THE AUDITOR DISCLOSED THE LACK OF PROCEDURE QUALIFICATION RECORDS OR TESTS FOR ESD'S 236 & 244		(22)	121			
63	63				HUDSON	PULLMAN'S LINGUISTIC DISTINCTION IMPROPERLY EXCLUDES NONDESTRUCTIVE MEASUREMENTS FROM THE SCOPE OF 10CFR50, APPENDIX B, CRITERION IX, DESPITE THEIR SIGNIFICANCE TO PLANT SAFETY		(22)	121			
64	64				HUDSON	MR. HUDSON'S UNSCHEDULED INTERNAL AUDIT (UIA) #34 OF VALVE WALL THICKNESS DATA REPORTS DEMONSTRATED THAT THE DATA REPORTS ARE INCOMPLETE AND NOT TRACEABLE		(22)	121			
65	65				HUDSON	DATA REPORTS OFFERED UNRELIABLE, INCONSISTENT INFORMATION WITH ORIGINAL INFORMATION BEING WHITED-OUT AND ALTERED WITHOUT SIGNATURE OR EXPLANATION		(22)	121, B			
66	66				HUDSON	NECESSARY RECORDS WERE NOT CONSISTENTLY AVAILABLE TO DEMONSTRATE CALIBRATION OF THE MEASURING EQUIPMENT CAUSING RESULTS SKEWED .6% - .46% OVER AEC MAXIMUM ERROR		(22)	121, B			

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ALLEGATION SOURCE DOCUMENT				ALLEGOR	CHARACTERIZATION	OLD		NEW	
2/2/86	12/22/16	3/2/86	3/2/86			FOLLOW UP	CLOSED	PG&E	NRC
GAP	J1	GAP	J1	GAP					
45	45			LOCKERT	QC MANAGEMENT TOLD INSPECTORS NOT TO PERFORM INSPECTIONS WHEN CONSTRUCTION OBJECTED			(22) 129	
46	46			LOCKERT	FIVE FULLMAN QA MANAGERS REFUSED A QC INSPECTOR'S REQUEST FOR COPIES OF THE WELDING PROCEDURE FOR WHOSE COMPLIANCE HE WAS RESPONSIBLE			(22) 129	
47	47			LOCKERT	A QC SUPERVISOR ORDERED MR. LOCKERT TO ACCEPT A FULL PENETRATION WELD WITHOUT BEING ALLOWED TO INSPECT THE BACK OF THE WELD AS WELL AS THE FRT			(22) 129	
48	48			HUDSON	PROCESS SHEETS THAT GUIDE QUALITY CONTROL COVERAGE DID NOT CONSISTENTLY CALL FOR INSPECTIONS OF FITUP FOR FLARE BEVEL GROOVE WELDS		(22) 192, 93, 104		
49	49			HUDSON	PG&E INFORMALLY EXEMPTED FLARE BEVEL WELDS FROM QC FITUP INSPECTIONS WITHOUT PROPER ENGINEERING REVIEW AND APPROVAL		(22) 192, 93		
50	50			HUDSON	SINCE JULY, 1979 FULL PENETRATION WELDS LESS THAN 9/16 INCH THICK HAVE NOT BEEN ULTRASONICALLY TESTED (UT)		(22) 115		
51	51			HUDSON	PG&E ENGINEERS ACCEPTED THE UT LOOPHOLE WITHOUT THE REQUIRED REVIEW AND WITHOUT REVISING RELEVANT CONTRACT SPECIFICATIONS		(22) 115		
52	52			HUDSON	PROCEDURES FOR INSPECTIONS MAY HAVE BEEN AS UNCONTROLLED AS FOR THE WELDS THEMSELVES			(4) 18 not	
53	53			HUDSON	APRIL 14, 1983 QC DISCREPENCY REPORT (DR) ERRONEOUSLY APPROVED WELDING PROCEDURE CHANGES BY A PRODUCTION FOREMAN IN 1972		(22) 103 PARA. 11		
54	54			HUDSON	FULLMAN QC INSPECTORS FAILED TO REJECT WELDS THAT WERE PERFORMED TO THE WRONG PROCESS IN 1972		(22) 103 PARA. 11		
55	55			HUDSON	IN THE APRIL 1983 DISCREPENCY REPORT, FULLMAN'S QC PROGRAM STILL FAILED TO RECOGNIZE THE INABILITY OF INSPECTORS (IN 1972) TO NOTICE THE WRONG TYPE OF WELDS		(22) 103 PARA. 11		

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12/2/84	2/22/84	3/2/84	3/2/84	3/23/84			FOLLOW UP	CLOSED	PG&E	PGE	NRC
GAP	JI	GAP	JI	GAP							
34	34				HUDSON	PG&E IMPROPERLY SUBSTITUTED CODE 92/93 FOR PIPE RUPTURE RESTRAINTS WHEN PROCESS SHEETS SPECIFIED WORK WOULD BE DONE TO CODE 7/8		(22) 214-217			
35	35				HUDSON	THE SWITCH FROM CODE 7/8 TO CODE 92/93 WAS BASED ON PREMISE THAT BOTH PROCEDURES WERE QUALIFIED TO UNLIMITED THICKNESS AND TECHNICALLY EQUIVALENT		(22) 216			
36	36				HUDSON	PULLMAN WELDERS WORKING UNDER WELDING PROCEDURES THAT ARE NOT QUALIFIED FOR THEIR ASSIGNMENTS		(22) 214-217			
37	37				LOCKERT	PULLMAN DID NOT REGULARLY CALIBRATE ITS WELDING MACHINES AND FAILED TO ISSUE EQUIPMENT THAT WOULD CONTROL THE AMPERAGE FOR WELDS			(22) 129		
38	38				LOCKERT	SINCE 1977 PULLMAN HAS USED GTAW WELDING MACHINES THAT VIOLATE CONTRACT SPECIFICATIONS DUE TO ABSENCE OF ELECTRICAL CURRENT CONTROLS AND AN ON-OFF SWITCH			(22) 129		
39	39				LOCKERT	THE EFFECT OF THE IMPROPER EQUIPMENT WAS THAT WELDS CONSISTENTLY WERE CONTAMINATED WITH TUNGSTEN			(22) 129		
40	40				LOCKERT	PULLMAN QA MANAGER, HAROLD KARNER, REFUSED TO HONOR CONTRACT SPECIFICATIONS, AFTER MR. LOCKERT EXPLAINED THE EFFECT ON THE QUALITY OF THE WELDS. MR. LOCKERT WAS LATER DISMISSED					01
41	41				LOCKERT	MR. LOCKERT WAS TOLD NOT TO DISCUSS DEFICIENT GTAW MACHINES WITH PG&E'S NPO WELDING ENGINEER			(22) 129		
42	42				LOCKERT	FROM 1969 TO 1983, PULLMAN'S PROCEDURES FOR STORAGE OF CERTAIN WELDING ELECTRODES WERE DEFICIENT			(22) 129		
43	43				LOCKERT	ALTHOUGH MANAGEMENT OFFICIALS PROMISED TO CORRECT WELD ROD STORAGE VIOLATIONS, CORRECTIVE ACTION WAS INEFFECTIVE			(22) 129		
44	44				HUDSON	THE INTEGRITY OF WELD INSPECTIONS IS COMPROMISED BY PROSPECTIVE WELDING INSPECTORS CHEATING ON QUALIFICATION TESTS			(22) 123		

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12/2/84	2/22/84	3/2/84	3/2/84	3/23/84			FOLLOW UP	CLOSED	PG&E	PGE	NRC
GAP	JI	GAP	JI	GAP							
23	23				LOCKERT	PULLMAN QA MANAGER FAILED TO RESPOND TO AN INSPECTOR'S WRITTEN NOTIFICATION OF THE IMPROPER SUBSTITUTION OF A WELDING TECHNIQUE FOR AN APPROVED PROCEDURE		(22) 106-108			
24	24				LOCKERT	PULLMAN QA MANAGER COERCED AN INSPECTOR TO CONDUCT INSPECTIONS FOR COMPLIANCE BY OFFERING THE ALTERNATIVE OF "LOOKING FOR A NEW JOB"	(22) 120 130				
25	25				LOCKERT	EVEN IF WELD TECHNIQUE SPECIFICATION NO. AWS 1-1 WERE AN APPROVED PROCEDURE, ITS USE WAS INADEQUATE		(22) 106-108 109-110			
26	26				HUDSON LOCKERT	AWS 1-1 FAILED TO CORRECT THE IMPROPER USE OF CODE 7/8, DUE TO THE USE OF UNACCEPTABLE STEEL		(22) 106-108			
27	27				HUDSON	IMPROPER USE OF INFERIOR STEEL WAS APPROVED BY AN OFFICIAL WHO RECORDS SHOWED WAS SIMULTANEOUS CONSTRUCTION & QA OFFICIAL		(22) 106-108			
28	28				HUDSON	PG&E CONTRACT REQUIREMENT FOR CHARPY STRENGTH TESTS WAS IMPROPERLY WAIVED FOR CODE 7/8 AND OTHER WELDING PROCEDURES ON PIPE RUPTURE RESTRAINTS		(22) 114			
29	29				UNKNOWN 1/16/84 AFFIDAVIT	FAILURE TO COMPLY WITH WELD PROCEDURE REQUIREMENTS LED TO "TRULY PATHETIC" WELDS FOR THE PIPE RUPTURE RESTRAINTS			(22) 189		
30	30				HUDSON	PULLMAN IMPROPERLY GRANTED ITSELF A GENERIC EXEMPTION FROM AWS DESIGN, FABRICATION, AND ERECTION REQUIREMENTS FOR ALL STRUCTURAL STEEL PIPE SUPPORT WELDING		(22) 109, 110			
31	31				HUDSON	CODE 88/89 HAS BEEN USED TO WELD STEEL SHAPES AND PLATES IN THE CURRENT DESIGN MODIFICATIONS		(22) 116, 117			
32	32				HUDSON	CODE 88/89 HAS BEEN USED TO WELD PLATES AND SHAPES TO RUPTURE RESTRAINTS WITH 2 WELDING PROCESSES - SMAW & GTAW		(22) 118, 119			
33	33				HUDSON	PG&E IMPROPERLY RESPONDED TO THE MISUSE OF CODE 88/89		(22) 118, 119			



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12/2/84	2/22/84	4/3/2/84	3/2/84	3/23/84				UP	CLOSED	PG&E	PGE
GAP	JI	GAP	JI	GAP							
12	12				HUDSON	CODE 7/8 WAS USED TO WELD THREADED STUDS TO CONTAINMENT LINER - QA MANAGER "YANKED" THE REPORTING INSPECTOR FROM THE ASSIGNMENT		(22) 103-105			
13	13				HUDSON	WELDING OF THREADED STUDS VIOLATED CODE 7/8, WHICH CALLS FOR THE USE OF A BACKING BAR		(22) 109-110			
14	14				HUDSON	FULLMAN OVEREXTENDED CODE 7/8 BY WELDING COMMON HARDWARE BOLTS, INSTEAD OF THREADED STUDS. CONSTRUCTION CREWS TURNED THE BOLTS INTO STUDS BY CHISELING THE HEADS OFF AND CHISELING TO A POINT		(22) 103-105 & 131			
15	15				HUDSON	NEITHER HAVE CONTROLLED CHEMICAL CONTENTS NOR		(22) 131			
16	16					PIPE SUPPORT JOINT CONFIGURA-		(22) 103-105			
17	17				HUDSON	PIPE RUPTURE RESTRAINTS TO FIVE METALS DIFFERENT MATERIAL		(22) 105, 110			
18	18				HUDSON	CODE 7/8 WAS IMPROPERLY USED TO WELD "W" SHAPES AND TUBE STEEL TO PIPE RESTRAINTS		(22) 103-105			
19	19				HUDSON	CODE 7/8 WAS IMPROPERLY USED FOR 11 PIPE RUPTURE RESTRAINT JOINT CONFIGURATIONS		(22) 104			
20	20				HUDSON	PIPE RUPTURE RESTRAINT WELDING WAS CONDUCTED WITHOUT ANY ESTABLISHED OR DOCUMENTED PROCEDURE		(22) 126			
21	21				LOCKERT	PULLMAN SUBSTITUTED A WELD TECHNIQUE SPECIFICATION (AWS D1.1) AS CORRECTIVE ACTION FOR USE OF ASME PROCEDURES		(22) 106			
22	22				LOCKERT	QA MANAGEMENT DIRECTED INSPECTORS TO "WINK" AT VIOLATIONS ON GROUNDS THAT DEFECTS WOULD BE CAUGHT BY OTHER DEPARTMENTS		(22) 120, 130 011			



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2/2/84	2/22/84	3/2/84	3/2/84	3/23/84			FOLLOW UP	CLOSED	PG&E	PCR	NRC
GAP	JI	GAP	JI	GAP					(22)		
1	1				LOCKERT	PULLMAN WELDERS HAVE BEEN QUALIFIED WITHOUT ANY QA COVERAGE			123 129 (22) 128 129		
2	2				LOCKERT	MANAGEMENT DID NOT DEMONSTRATE ANY COMMITMENT TO WELDER QUALIFICATIONS WHEN NOTIFIED OF THE VIOLATION		(22) 128			
3	3				LOCKERT	PULLMAN REFUSED TO PROCESS A FORMAL QC REPORT ON THE UNCONTROLLED WELDING QUALIFICATION TESTS			(22) 129		
4	4				LOCKERT	A PRODUCTION OFFICIAL REFUSED THE QC INSPECTOR ACCESS TO INSPECTION RECORDS	(22)				
5	5				LOCKERT	QC INSPECTOR TERMINATED IN RETALIATION FOR PURSING WELDER QUALIFICATION TEST VIOLATIONS	120, 130 OI				
6	6				LOCKERT	PULLMAN QA MANAGER TOLD NRC THAT THE QC INSPECTOR QUIT, WHEN HE WAS ACTUALLY FIRED	(22) 120, 130 OI				
7	7				HUDSON	FROM 1974-1979, WELDER QUALIFICATIONS ARE INDETERMINATE		(22) 103-119			
8	8				HUDSON	PG&E CHANGED CONTRACT SPECIFICATIONS THROUGH NOTES WITHOUT CONTROLLED REVIEW AND APPROVAL (AWAITING SPECIFICS FROM PG&E - SEE #215)		(22) 103-119			
9	9				HUDSON	WELDER QUALIFICATIONS CANNOT BE VERIFIED BY RECONSTRUCTING WELD ROD		(22) 103-119 & H&E IR83-37			
10	10				HUDSON	IMPROPER WELD PROCEDURE WAS USED TO WELD TUBE STEEL TO PIPE SUPPORTS		(22) 103-105			
11	11				HUDSON	ASME-BASED WELD PROCEDURE CODE 7/8 WAS IMPROPERLY USED TO WELD THREADED WELD STUDS ON CLASS I PIPE SUPPORTS		(22) 103-105			