

SSER

Task: Allegation A-136

Reference No.: 4-84-A-06-31

Characterization: The allegation is that it was difficult for EBASCO quality assurance (QA) personnel to get approval to initiate a formal nonconformance report between 1975 and 1977 in the civil-structural area.

Assessment of Allegation: The NRC staff reviewed the procedure ~~which~~ for civil-structural nonconformances between 1975-1977. The EBASCO procedure required a nonconformance report (NCR) when, for example, there were physical defects, test failures, incorrect documentation, or deviations from prescribed inspection or test procedures. An NCR was usually created from upgrading a discrepancy notice (DN). Unlike a DN, the NCR required a separate evaluation by a QA engineer to ascertain if it should be upgraded to a reportable item under 10 CFR 50.55(e). The alleged stated that, in the early days of construction, QA reviewers were discouraged from writing NCRs to avoid further independent evaluation of discrepancies or safety violations.

The NRC staff reviewed the allegation and found the following:

1. The EBASCO procedure for writing NCRs has been in existence since September 1975. The first DN was generated in October 1975 by EBASCO civil-structural QA personnel. Therefore, the procedure was available by the time the first DN was written. NCRs were also written in 1975 and 1976, for example, on concrete work associated with the basemat.
2. LP&L has re-evaluated all the concrete packages, soils packages, and structural steel construction packages and found that there is no significant violation of procedures and construction requirements. The NRC staff found no issues during this period which clearly indicated an NCR should have been written in the civil-structural discipline but was not.

3. The NRC staff reviewed sample DNs written between 1975 and 1977 and found none that addressed significant safety issues which were not upgraded to NCRs.

In view of the NRC staff's assessment, this allegation has neither safety significance nor generic implications. This conclusion is contingent upon the results of investigations being performed by the NRC Office of Investigations and further technical evaluations may be necessary depending on the outcome of these investigations.

Potential Violations: None.]

Actions Required: None.

References

1. NCR 5594 and attachments.
2. NCR 6263 (see Allegation A-141).
3. Letter from R. S. Leddick, LP&L to D. G. Eisenhut, NRC, "Docket No. 50-382, Waterford Unit 3 Allegations," April 27, 1984, item 2.
4. EBASCO Services Inc., Waterford-3 Procedure for Nonconformance Report ASP-III-6, March 5, 1975.
5. J. A. Jones Discrepancy Report, Number 0079 "Concrete Void," June 30, 1976.

Statement Prepared By: _____
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Team Leader _____ Date _____

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Approved By: _____
Task Management _____ Date _____

Document Name:

SSER A-136

Requestor's ID:

PATTYN

Author's Name:

Document Comments:

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Actions Required: None.

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