

#4
Revision 1
6/28/84

SSER

Task: Allegation A-05

Reference No.: 4-83-A-65/1

Characterization: It is alleged that Ebasco quality assurance (QA) personnel used speed letters instead of deficiency notices (DNs) to identify problems on system turnover documentation packages.

Assessment of Allegation: The implied significance of this allegation is that, because speed letters are an unauthorized corrective action system, QA corrective action and nonconformance control systems may have been circumvented. Speed letters do not provide for accurate identification of deficiencies or discrepancies, and do not assure that corrective action has been taken regarding safety-related systems.

The NRC staff reviewed Ebasco QA procedures for system turnover to determine if the procedures provided for accurate records review to assure proper identification of nonconformances. The staff also noted whether or not the procedures allowed the use of speed letters, and whether or not corrective action documents were generated based on the contents of the speed letters.

The NRC staff reviewed Ebasco Quality Assurance Instruction (QAI)-9 and compared it to applicable ANSI 45.2 standards and 10 CFR 50 requirements. The staff found QAI-9 to be acceptable. QAI-9 provided guidelines for the collection, handling, and review of construction and installation QA records and for transmittal to the Ebasco QA Records Supervisor for storage, handling, and maintenance. QAI-9 also provided instructions for describing the review status of construction and installation records. Quality assurance records reviewers were required to review packages for completeness, accuracy of content, proper form, traceability, legibility, authenticity, and proper changes and supplements. Any deficiencies noted on the documentation were to be corrected, or, if unable to be resolved prior to submittal for turnover, they were to be documented on Form QAI-9.2. As a part of the review status, a separate recommendation was to be made on the form to identify potential deficiencies affecting hardware.

The NRC staff found that Ebasco QA procedures did not address the use of speed letters as an alternative for identifying deficiencies or discrepancies. However, the staff did determine that speed letters were used to request information regarding engineering problems, to obtain engineering evaluations, and to question the disposition or closure of deficiencies, and that they were also used by the Ebasco Quality Assurance Installation Review Group (QAIRG) to identify problems noted on the authorized QAI-9.2 forms. The speed letters

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transmitting this information were then forwarded to lead coordinators who resolved or provided dispositioning instructions to the reviewer.

The NRC staff reviewed the QAI-9.2 forms of 68 documentation packages and determined that the information noted in the Ebasco speed letters referenced previously identified problems stated on the QAI-9.2 forms. The staff found that corrective action documents, QAI-9.2 forms, NCRs, and DNs were generated as a result of these reviews.

However, during the NRC staff's review, several deficiencies were noted regarding item resolution or non-resolution. The staff believes that, due to the nature of the deficiencies, an NCR should have been written for:

- o Q2-CS-1C-27 - 9.2 Reviewed Item 63 - Inadequate documentation; should have been elevated to an NCR.
- o Q2/3-FW/1C-851 - 9.2 Reviewed Items 18, 19, 20; Q1-RC-1C-674 - 9.2 Reviewed Item 13
 - (1) Improper Closure Reference TBP-35; to be revised to correct deficiencies on February 15, 1983, latest revision of TBP-35 was June 18, 1982. NCR should have been issued. (2) Removal of QC checkpoint was improperly authority.
- o Q2-SI-1C-89 - 9.2 Reviewed Item 17 - Incorrect/inadequate documentation; should have been elevated to an NCR.
- o QMC-APO-P47E - 9.2 Reviewed Item 26 - Closed DR with another DR, instead of an NCR. Penetrant test acceptance dates preceded the test request (prior to completion of the report). Both issues warranted an NCR.
- o BD-1C-1143 - Traceability was required to warehouse only and not to the point of installation. Heat numbers were used interchangeably. Should have been upgraded to an NCR.
- o Q1-RC-LWS-RC-2 - Same as Q2/3-FW/1C-8510.
- o LW3-RC-29 - 9.2 Reviewed Item 11 - Flange retorqued but gasket installation was indeterminate. An NCR should have been issued.
- o Q2-LW3-SI-10 F/E - 9.2 Reviewed Item 11 - Additional data added to a CMTR; procedural violation. An NCR should have been issued.
- o CH-1C-342 - 9.2 Reviewed Items 19 and 25. Same as Q2/3-FW/1C-851.
- o CC-1C-6 - 9.2 Reviewed Item 1 - A DN was issued but did not relate to DR subject denoted. Flange was retorqued May 11, 1984. Potential Generic Issue - Use of 0-600 ^{ft-lbs} torque wrench for 90 ft-lbs when not calibrated at low range. (Identified as generic problem in DN T-B W-6531.) Resolution was "use as is" since the bolts are evenly torqued, but

ft-lbs

resolution did not address problem of torque wrench. Generic problem for all 9.2 reviews that closed out deficiencies referencing this DN.

Conflicting guidance with the above; FCR MP382 and IR 07012 (T-B) state "torque to machine bolt specifications as opposed to evenly torqued."

- o AQMC-SI-P39-E - 9.2 Reviewed Item 10 - DN was written, but should have been an NCR.
- o QMC-HYPO-P11-E - 9.2 Reviewed Items 43, 78, 81 - Inspection and documentation required by problem CIWA were not performed in accordance with procedures; an NCR should have been written.

The NRC staff found ~~no objective evidence~~ that the use of speed letters *did not* circumvented the corrective action and nonconformance control systems. Ebasco's QA records review procedures were in accordance with applicable standards of ANSI N45.2 and the requirements of 10 CFR 50. The staff also believes that QAI 9.2 forms (DRs) were acceptable to use for identifying potential problems with safety-related systems.

However, as noted previously, other discrepancies exist in the QA documentation packages reviewed by the NRC staff and, although reported on QAI 9.2 forms, these discrepancies required further corrective action by LP&L.

Potential Violations: Failure to properly identify nonconforming conditions is a violation of 10 CFR 50, Appendix B, Criterion XV. 4

Actions Required: Prior to receiving an operating license, LP&L shall:

1. Review all DRs (QAI 9.2 forms) for possible escalation to NCRs.
2. Evaluate for reportability under 10 CFR 50.55(e).
3. Take adequate corrective action on identified problems.

References:

- See Item No. 6 in the Enclosure to Mr. D. Eisenhart letter of 6/13/84 to J.M. Con (LP&L).*
1. Quality Assurance Instruction (QAI) 9, Review and Handling of Construction-Installation Records.
 2. QAI 9.2, Construction-Installation Records Deficiency Report.
 3. 10 CFR 50, Appendix B, Criterion XV.

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