

SSER

Task: Allegation A259

Reference No.: 484A06142(3)

Characterization: It is alleged that "Class D" material used by Chicago Bridge and Iron (CB&I) in the fabrication of certain nonpressure bearing structural components inside the containment building was not welded with traceable weld rod and that the welds are not traceable to a specific welder.

Assessment of Allegation: This allegation is related to Allegation A258 regarding the traceability of materials categorized by CB&I as Class D that were used in the fabrication of certain nonpressure bearing structural components in the containment vessel. As described in the assessment of Allegation A258, these structural components include seismic clips that support safety-class piping systems, parts of the equipment hatch handling device, parts of the personnel and escape locks, crane rails and girders, stairs, ladders, and some temporary attachments and components. Ebasco categorized these components, with the exception of temporary items, as Seismic Category I. As such, they require material traceability. But, according to CB&I quality assurance procedures, material traceability was not required for what they categorized as Class D material and thus was not maintained. As stated in the assessment of Allegation A259, the traceability of the Class D structural steel was satisfactorily resolved by Nonconformance Report (NCR) 6224. Even so, this NCR did not address the traceability of the weld material.

To assess this issue the NRC staff reviewed the structures in which the "Class D" material was used and requested LP&L to provide the quality assurance documentation for welds in several of the structural components considered to have the greatest safety significance. These components were the containment spray system pipe supports (seismic clips), crane girders, and equipment hatch handling device. The staff also requested quality assurance (QA) documentation for such items as welding procedures, welder identification and qualifications,

weld rod identification, and the inspection results for certain welds in these components. This quality assurance information is required for welds in safety-related structures. As of May 31, 1984, LP&L was unable to produce the records requested by the NRC staff. The inability to produce the appropriate quality assurance records makes the quality of these safety-related structures indeterminable and the NRC staff has concluded that LP&L must take additional actions, as described below, to resolve this issue.

Potential Violations: The inability to produce quality assurance records for welds in safety-related structures is a violation of Criterion XVII, "Quality Assurance Records" of Appendix B to 10 CFR Part 50. Criterion XVII requires that sufficient records be maintained to furnish evidence of activities affecting quality.

Furthermore, the possibility exists that because of the erroneous Class D categorization of materials in safety related structures, the required quality assurance activities were not performed, nor were the required quality assurance records generated. Thus, there are potential violations of Criterion VIII, "Identification and Control of Materials, Parts, and Components"; Criterion IX, "Control of Special Processes"; and Criterion X, "Inspection." Criterion VIII requires the identification and control of materials, and criterion IX requires the control of welding, inspection processes and personnel. Criterion X requires the establishment and execution of an inspection program.

Actions Required: If LP&L cannot produce the required quality assurance documentation for the welding of "Class D" materials inside the containment vessel, they shall develop and implement a program to assure that the subject safety related structural components have adequate quality so as not to adversely affect their structural integrity and safety related functions. The program shall include a review of the structures in which Class D material was used and identification of those that are safety related. Actions taken by the licensee to resolve the issue shall utilize one of the following approaches or an equally suitable method.

- o Demonstration that quality assurance requirements were met through the review of supplier, contractor, and/or other records.
- o Demonstration that the structural component of concern does not have a significant safety function and hence that quality assurance records are not necessary.
- o Appropriate nondestructive inspection and/or evaluations of appropriate structural welds.
- o Destructive analyses (materials property testing, chemical composition analyses etc.) of a representative sample of welds.
- o Rewelding of critical components in accordance with approved quality assurance and quality control procedures.

The results of LP&L's program shall be submitted to NRC and the NRC staff shall review the results to ensure that this issue has been satisfactorily resolved prior to fuel loading.

References

1. Assessment of Allegation A258
2. Nonconformance Report 6224 issued May 13, 1983
3. Code of Federal Regulations, Title 10, Part 50, Appendix B.

Statement Prepared By:	_____	_____
	J. Strosnider	Date
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Author's Name:

Document Comments:
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Task: Allegation A259 ✓

Reference No.: 484A06142(3) 4-84-A-06-142(3) ✓

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Assessment of Allegation: This allegation is related to Allegation A258 ✓
regarding the traceability of materials categorized by CB&I as Class D that
were used in the fabrication of certain nonpressure bearing structural
components in the containment vessel. As described in the assessment of
Allegation A258, these structural components include seismic clips that ✓
support safety-class piping systems, parts of the equipment hatch handling
device, parts of the personnel and escape locks, crane rails and girders,
stairs, ladders, and some temporary attachments and components. Ebasco ✓
categorized these components, with the exception of temporary items,
as Seismic Category I. As such, they require material traceability. But, ✓
according to CB&I quality assurance procedures, material traceability was
not required for what they categorized as Class D material and thus was not
maintained. As stated in the assessment of Allegation A259, the traceability ✓
of the Class D structural steel was satisfactorily resolved by Nonconformance
Report (NCR) 6224. Even so, this NCR did not address the traceability of
the weld material.

To assess this issue, the NRC staff reviewed the structures in which the "Class
D" material was used and requested LP&L to provide the quality assurance (QA) ✓
documentation for welds in several of the structural components considered to
have the greatest safety significance. These components were the containment
spray system pipe supports (seismic clips), crane girders, and equipment hatch
handling device. The staff also requested quality assurance (QA) documentation ✓
for such items as welding procedures, welder identification and qualifications,

weld rod identification, and the inspection results for certain welds in these components. This ~~quality assurance~~^{QA} information is required for welds in safety-related structures. As of May 31, 1984, LP&L was unable to produce the records requested by the NRC staff. The inability to produce the appropriate ~~quality assurance~~^{QA} records makes the quality of these safety-related structures indeterminable and the NRC staff has concluded that LP&L must take additional actions, as described below, to resolve this issue.

Potential Violations: The inability to produce ~~quality assurance~~^{QA} records for welds in safety-related structures is a violation of ^{10 CFR 50, Appendix B,} Criterion XVII, "Quality Assurance Records" of ~~Appendix B to 10 CFR Part 50~~. Criterion XVII requires that sufficient records be maintained to furnish evidence of activities affecting quality.

Furthermore, the possibility exists that because of the erroneous Class D categorization of materials in safety-related structures, the required ~~quality assurance~~^{QA} activities were not performed, nor were the required ~~quality assurance~~^{QA} records generated. Thus, there are potential violations of Criterion VIII, "Identification and Control of Materials, Parts, and Components"; Criterion IX, "Control of Special Processes"; and Criterion X, "Inspection." Criterion VIII requires the identification and control of materials, and ^{CR} Criterion IX requires the control of welding, inspection processes and personnel. ^{CR} Criterion X requires the establishment and execution of an inspection program.

Actions Required: If LP&L cannot produce the required ~~quality assurance~~^{QA} documentation for the welding of "Class D" materials inside the containment vessel, they shall develop and implement a program to assure that the ~~subject~~ safety-related structural components have adequate quality so as not to adversely affect their structural integrity and safety-related functions. The program shall include a review of the structures in which Class D material was used and identification of those that are safety related. Actions taken by ~~the~~^{LP&L} licensee to resolve the issue shall utilize one of the following approaches or an equally suitable method.

- o Demonstration that ~~quality assurance~~^{QA} requirements were met through the review of supplier, contractor, and/or other records. ✓
- o Demonstration that the structural component of concern does not have a significant safety function and hence that ~~quality assurance~~^{QA} records are not necessary. ✓
- o Appropriate nondestructive inspection and/or evaluations of appropriate structural welds.
- o Destructive analyses (materials property testing, chemical composition analyses, etc.) of a representative sample of welds. ✓
- o Rewelding of critical components in accordance with approved ~~quality assurance~~^{QA} and ~~quality control~~^(QC) procedures. ✓

The results of LP&L's program shall be submitted to NRC and the NRC staff shall review the results to ensure that this issue has been satisfactorily resolved prior to fuel loading.

References

1. Assessment of Allegation A258 ✓
2. Nonconformance Report 6224 issued May 13, 1983
3. Code of Federal Regulations, Title 10, Part 50, Appendix B.

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	Task Management	Date

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Task: Allegation A[~]259 X

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Characterization: It is alleged that "Class D" material used by Chicago Bridge and Iron (CB&I) in the fabrication of certain nonpressure bearing structural components inside the containment building was not welded with traceable weld rod and that the welds are not traceable to a specific welder.

Assessment of Allegation: This allegation is related to Allegation A[~]258 X regarding the traceability of materials categorized by CB&I as Class D that were used in the fabrication of certain nonpressure bearing structural components in the containment vessel. As described in the assessment of Allegation A[~]258, these structural components include seismic clips that support safety-class piping systems, parts of the equipment hatch handling device, parts of the personnel and escape locks, crane rails and girders, stairs, ladders, and some temporary attachments and components. Ebasco CAPS X categorized these components, with the exception of temporary items, as Seismic Category I. As such, they require material traceability. But, according to CB&I quality assurance procedures, material traceability was not required for what they categorized as Class D material and thus was not maintained. As stated in the assessment of Allegation A[~]259, the traceability X of the Class D structural steel was satisfactorily resolved by Nonconformance Report (NCR) 6224. Even so, this NCR did not address the traceability of the weld material.

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2. Nonconformance Report ^{W3-A} 6224 issued May 13, 1983 X
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