

ML *How*

REVISION 2
07/11/84

~~C of C DOES NOT
PROVIDE TRACEABILITY
BACK TO HEAT NUMBER.~~

SSER

Task: Allegation A-126, A-291

Reference No.: 4-84-A-06/21, 172

Characterization: It is alleged that Tompkins-Beckwith (T-B) did not maintain material traceability on the supplemental steel used with pipe hangers and supports. The supplemental steel refers to additional steel used to install pre-fabricated pipe hangers and supports.

Assessment of Allegation: Bergen-Patterson (B-P) furnished pre-fabricated piping supports and hangers. EBASCO furnished the supplemental structural steel for use by T-B during installation of the piping hangers and supports.

The EBASCO specifications and 10 CFR 50, Appendix B requirements specify that only properly certified material in accordance with ASTM specifications be used for supports and hangers. B-P and the structural steel suppliers to EBASCO provided Certificates of Compliance (C of C) with each shipment. The C of C stated that the material furnished met ASTM specifications.

The EBASCO Material Inspection Receiving Report (MIRR) was used to verify that the correct material was received. A Requisition on Warehouse (ROW) was used by T-B to obtain release of the material from EBASCO.

The initial T-B program was established to provide traceability of the paint to be used on the supplemental steel. A material control number was steel stenciled on each item listed on the ROW. If the material was cut into smaller pieces, the number was to be transferred accordingly.

After number stamping, the material was painted by a subcontractor. Different colored paint was used with yellow signifying non-safety non-permanent material. The other colors used designated safety related material.

In 1978, T-B agreed to a contract change with EBASCO to extend the paint material traceability system to also include steel traceability. Because the change came after the original program had been in operation, a number of implementation problems occurred and providing full steel traceability proved difficult.

In late 1983, the contract between EBASCO and T-B was changed to reflect a decision by EBASCO to abandon attempts to provide supplemental structural steel traceability using material control numbers. The supplemental structural steel certification program continued to be in effect as it had been throughout the project.

The alleged based his concern on his knowledge of the material traceability system that was in effect June 1978 to 1984. The system described in the allegation is not representative of the original or final programs. The change back to the original material control system in early 1984 resolves the concern of the alleged. The NRC staff concludes that the support material traceability meets the requirements of 10 CFR 50, Appendix B.

The NRC staff discussed these findings with the alleged on May 3, 1984. He agreed and expressed satisfaction with the explanation and resolutions of this issue. This allegation has no safety significance nor generic implications.

Potential Violations: None.

Actions Required: None.

References:

1. T-B Procedure TPB-49
2. T-B Procedure TPB-19

Statement Prepared By:

R. W. Hubbard

_____ Date

Reviewed By:

Team Leader

_____ Date

Reviewed By:

Site Team Leader(s)

_____ Date

Approved By:

Task Management

_____ Date

(A)

The supports and supplemental material were designed to seismic Category I requirements. 10 CFR 50 App B quality assurance requirements apply. Section VIII of this specification allows identification of an item to be maintained by records traceable to the item. As a result, Certificates of Conformance furnished by the suppliers verified that the material furnished was properly certified in accordance with the applicable ASTM Specifications.