

SSER

Task: Allegation A-186(b)

Reference No.: 4-84-A-06/81b

Characterization: It is alleged that an Ebasco Records Reviewer stamped off 1,600 civil records (concrete) in an 8-hour work day in September 1982.

Assessment of Allegation: The implied significance of this allegation is that incomplete records, and improper review of quality records for technical adequacy, could cause the quality of construction and the results of inspections to be questionable.

The NRC staff interviewed the Ebasco records reviewer and the immediate supervisor, and compared the individual's qualifications to the job prerequisites. The staff examined Ebasco's review of contractors' civil records stored in Ebasco's vault, and also reviewed the basis for the excessive amount of documents stamped off in a short time frame.

The NRC staff found during the interview of the individual and his immediate supervisor that the individual's role in documentation review of civil concrete quality records was as follows:

1. His actual job description was Records Coordinator, not Records Reviewer as stated by the allegor. The Coordinator's responsibility was to assemble, into one task file, various quality records from contractors participating in concrete placement (i.e., concrete pour package). It appeared that the allegor was unaware of the difference in the job descriptions between a Records Reviewer and a Records Coordinator.
2. The types of records assembled by this individual into the files that were transmitted to Ebasco's vault for Ebasco QAIRG review included (a) top tier concrete drawings (DWGs); and (b) individual pour packages associated with those DWGs, including batch (concrete placement pour) slips, concrete material testing reports, gradation sheets from the batch plant for sand and gravel, etc., and quality related activity and inspection records for preplacement (rebar, inplacements, and forms), placement of concrete, curing of concrete, and postplacement (form removal and checking for voids).

Contractors involved with preplacement, placement, postplacement activities were J. A. Jones, American Bridge, Allied, Gulf Engineering, and Peabody Testing (GEO).

Document review and collation by the Records Coordinator was for sorting and accumulating concrete documentation by task or activity. This was not a review for technical adequacy. This review included completeness, proper form, legibility, and authenticity of documentation. Upon completion of

records collation and review, the Records Coordinator grouped the records by type and task. Prior to submission to the Ebasco vault for QAIRG review, the Coordinator stamped the records to signify accountability and review action complete.

Transmittal packages to the vault could contain up to 250 records. In a day, between 500 to 600 records were stamped and submitted to the vault. The governing procedure for this activity was Ebasco generic procedure AIQ-9.

The NRC staff compared the individual's qualifications to his job assignment. It was determined that his qualifications complied with the job performance prerequisites. It was also noted that he did not receive the QAIRG review training; however, since no review for technical adequacy, accuracy of content, or traceability was required, his past experience, training and education provided adequate qualifications.

The allegation notes that based on an Ebasco QAIRG review of 70 of the 1,200 civil concrete pour package quality records numerous problems were identified. Based upon deficiencies noted during this review, several discrepancy reports (DRs) were initiated, and nonconformance reports (NCRs) were then issued identifying generic discrepancies. To disposition the NCRs, the QAIRG initiated a 100% re-review of the concrete packages. The NRC staff interviewed the alleged, who stated he was satisfied with Ebasco's corrective action.

For further information regarding the alleged individual's stamping ("bean counting") and document review, see Allegations A-143 and A-289.

In conclusion, the individual's stamping was not to document technical review, but to account for and collate records. This allegation has neither safety significance nor generic implications.

Potential Violations: None.

Actions Required: None.

#### References

1. ANSI N45.2.9 - Requirements for collection, storage, and maintenance of QA records for nuclear power plants.
2. Ebasco Procedure QAI-9, Rev. 0 dated October 29, 1979, review and handling of construction installation records.
3. Staff interview with Paul Elkins and Sam Horton.
4. Allegor A, Exhibit 4-84-A-06/36.

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