

REVISION 2
08/15/84

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Task: Allegation A-298

Reference No.: 4-84-A-06-178b

Characterization: It is alleged that the EBASCO vendor reviews are inadequate and that quality control (QC) was not checking structural items for defects such as shop welds by Peden Steel.

Assessment of Allegation: A review of this allegation by the NRC staff in the civil-structural discipline concerning Peden Steel indicated that vendor reviews were performed at the vendor's facility by a vendor quality assurance representative (VQAR) who was employed by EBASCO. A review of records by the NRC staff confirmed that the VQAR performed inspections of safety-related structural items fabricated by Peden. These records date from June 1976 to November 1983. Vendor reviews in other disciplines are addressed in Allegation A-165/166/292/293/297/299, and 300.

The EBASCO QC organization for receiving and inspecting vendor-fabricated structural items did review and inspect such items as received at the site. In addition, the EBASCO records review group reviewed all vendor documentation in accordance with QAI-1, Revision 11, "Quality Assurance Records Management Instruction," dated July 12, 1983.

Review of a nonconformance report NCR W3-4776 by the NRC staff indicated that EBASCO QC rejected a shipment of reactor auxiliary building (RAB) restraint steel, by Peden steel upon arrival at the site. The steel was rejected because the shop welds on the whip restraints did not conform to the design drawings and the requirements in American Welding Society, AWS D1.1. The welds were undersize and indicated undercut and a lack of fusion. This illustrated that a QC program was in effect onsite and offsite. In this particular case, the onsite reinspection of Peden Steel was a part of the overall quality program and performed its function by identifying problems not previously found by the offsite VQAR.

The NRC Construction Appraisal Team (CAT) inspection findings also indicated weld deficiencies in Peden Steel shop welds. This finding led to the preparation of NCR W3-5805. Attachments 7 through 10 of the NRC CAT inspection report listed welded connections that were evaluated by EBASCO Site Support Engineering (ESSE). A total of 720 welds were examined, of these 28 had aspects not in accordance with the specifications and needed to be reevaluated. They were evaluated by ESSE and none required reworking.

From the results of the staff evaluation, it was determined that there were inadequacies in the vendor inspection effort. Some of these were identified by other QA levels and others similar to those found by the CAT inspection had not

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been previously identified. Based on the specific issue in the civil-structural discipline, it appeared all safety concerns were resolved. The generic implications are addressed in Item 5 in the enclosure to the D. Eisenhower letter of June 13, 1984, to J. M. Cain (LP&L).

Potential Violations: None.

Actions Required: None.

References:

1. NCR-W3-4776.
2. NCR-W3-5805.
3. Procedure QA-III-5, Revision 3, "Supplier Contractor Surveillance" dated October 8, 1982.
4. Procedure QAS-10, Revision 4, "Vendor Documentation Audit," dated July 20, 1979.
5. Significant Construction Deficiency No. 78.
6. Significant Construction Deficiency No. 73.
7. Discrepancy Notice No. SQ-2167.
8. NCR-W3-1072.
9. VQAD-8, Revision 3, "Preparation and Control of Vendor Quality Assurance Report - Release for Shipment Form," dated January 18, 1982 (EBASCO).
10. VQAD-10, Revision 3, "Preparation and Control of Implementing Procedures," dated January 18, 1982 (EBASCO).
11. VQAD-13, Revision 2, "Review of Vendor Documentation," dated June 12, 1981 (EBASCO).
12. QA-P.1, Revision 5, "Review of Vendor's Procedures," dated December 15, 1980 (EBASCO).

Statement Prepared By:

Claude E. Johnson

Date

Reviewed By:

Team Leader

Date

Reviewed By:

Site Team Leader(s) _____

_____ Date

Approved By:

Task Management _____

_____ Date

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structural discipline Assessment of Allegation: A review of this allegation by the NRC staff *in the civil-* concerning Peden Steel indicated that vendor reviews were performed at the vendor's facility by a vendor quality assurance representative (VQAR) who was employed by EBASCO. A review of records by the NRC staff confirmed that the VQAR performed inspections of safety-related structural items fabricated by Peden. These records date from June 1976 to November 1983. *Vendor reviews in other disciplines are addressed in Allegation A-105/166/292/293/297/299 and 300.* The EBASCO QC organization for receiving and inspecting vendor-fabricated structural items did review and inspect such items as received at the site. In addition, the Ebasco records review group reviewed all vendor documentation in accordance with QAI-1, Revision 11, "Quality Assurance Records Management Instruction," dated July 12, 1983.

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it was determined that there were inadequacies in the vendor inspection effort. From the results of the staff evaluation, ~~it appeared that this allegation has neither safety significance nor generic implications. Some of these were identified by other QA levels and others similar to those found by the CAT inspection had not been previously identified.~~ Potential Violations: None. *Based on the specific issue in the civil-structural discipline it appeared all safety concerns are resolved. The generic implications are addressed in Item 5 in the Enclosure to the ~~Rosen~~ Eisenhut letter of June 13, 1984 to J.M. Cain (LP&L).*

Actions Required: None.

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