

FINAL

SSER

Task: Allegation A-223

Ref. No.: 4-84-A-06/11

Characterization: The allegation is that there were documentation discrepancies between the field construction and QC packages, that Operational Control Records (OCRs) 492 and 903 had Penetrant Test (PT) reports and signatures missing and that repair data and documentation was confusing.

Assessment of Allegation: The implied significance of this allegation is that incomplete, missing, and conflicting documentation raise a question regarding the quality of the installation and the inspection results.

The NRC staff investigated this allegation by reviewing nine OCR packages, including OCRs 492 and 903. This was done to determine if the problems identified were generic. Systems reviewed included Reactor Coolant, Safety Injection, Feedwater, Charging Water, and Main Steam.

The review of OCRs 492 and 903 revealed no missing PT reports nor missing signatures. Ebasco originally reviewed all Mercury packages in accordance with QAI-9. Deficiency Reports (DR) were issued and tracked for all discrepancies noted during the Ebasco review. Deficiencies were corrected prior to system turnover.

During the NRC staff review of OCRs 1782 and 1924, one weld from each package was found to have missing PT records. LP&L and Ebasco had PTs performed on these two welds and both welds were acceptable.

The staff also found that field construction records (green sheets) were destroyed and that the only remaining record of work performed was the QA copy (pink sheets). These QA records were generally in poor physical condition and because of the many crossouts and explanatory notes, were confusing and difficult to follow; however, the records were acceptable and adequately documented the actual as built configuration. Later revisions of weld record QA sheets showed significant improvement in the quality of the records and had original data recorded on the original record form.

The NRC staff reviewed the QA documentation for approximately 600 welds and concluded the following: the missing PT records were isolated cases; the records were poorly maintained; weld history was difficult to follow; the filing system was extremely cumbersome, making retrievability difficult; and records were not always original copies (but originals are not a requirement). Even though the noted problems are a NRC concern, all requested records were available and were found to be acceptable. This allegation has neither safety significance nor generic implications.

Potential Violations: None.

Actions Required: None.