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Task: Allegations A-290 and A-301

Reference No.: 4-84-A-06-171; 4-84-A-06-179

Characterization: The allegation is that the disposition of corrective action documents was not adequate to correct the deficiency and changes were incorrectly made to QA records.

Assessment of Allegation: The implied significance of this allegation is that deficiencies identified could still be uncorrected, making the installation and inspection of safety-related systems questionable.

In assessing this allegation, the NRC staff (1) reviewed EBASCO and Tompkins-Beckwith (T-B) procedures for corrective actions; (2) sampled T-B QA documents that had deficiencies corrected by either an NCR, or by a speed letter, and (3) evaluated selected NCRs, DRs, and DNs for the proper disposition and corrective action.

The NRC staff also compared T-B and EBASCO procedures for corrective actions and for processing nonconformances (NCRs), DNs, and DRs, with the applicable requirements of the ASME code, ANSI 45.2, and 10 CFR Part 50, and found them to be acceptable. The use of speed letters and memo was not addressed in these procedures and the NRC staff concluded, after several interviews, that speed letters and memos were used to provide information or to request information between EBASCO and its subcontractors.

The NRC staff assessed the following specific allegations.

Allegation A-290 alleged that after a Deficiency Report was transmitted to Tompkins-Beckwith, it was questionable as to how corrective actions, including walk downs, were accomplished. (The NRC staff reviewed this allegation concurrently with Allegation A-33.) The staff determined that Quality Assurance Instruction (QAI) 9 provides adequate instructions for forwarding the deficiencies discovered during records review to the responsible organization for resolution. It also included actions to be taken by the reviewer should a deficient item require resolution through the implementation of an NCR or DN. However, the staff finds that the procedures lack instructions for followup action or resolution of these deficiencies to assure proper closure. Additionally, the NRC staff found that T-B's procedures did not address how these types of deficiencies would be resolved or closed.

Allegation A-301 alleged that about 40% of the changes made to records were not done correctly for both programmatic and hardware deficiencies. Most of these deficiencies were identified at least on a speed letter or on an EBASCO Deficiency Report. In many cases, the change made was not adequate to correct the deficiency. (See Allegation A-05 for examples of questionable disposition and inadequate or incomplete closure.) Based on a sample review of the packages and deficiency reports relating to the package, the NRC staff believes that there are still open deficiency reports.

The NRC staff also reviewed T-B DNs in Allegation A-302.

Potential Violations: The lack of an adequate procedure is a violation of 10 CFR 50, Appendix B, Criterion V, and the ASME Code. 4

Actions Required: LP&L shall prior to fuel load.

1. Review all Ebasco 9.2 deficiency reports to assure proper closure.
2. Correct all problems encountered in DRs not properly closed.

References

1. Tompkins-Beckwith, Inc., Nonconformance and discrepancies Procedure 12.
2. EBASCO Procedure for: Corrective Action, ASP III.7.
3. Quality Assurance Instruction (QAI) 9 - Review and Handling of Constructions-Installation Records.
4. Quality Assurance Instruction (QAI) 19 - Processing of Discrepancy Notices (DNs and Engineering Discrepancy Notices (EDNs).
5. Quality Assurance Instruction (QAI) 31 - Processing of Nonconformance Reports.

Statement Prepared By:

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06/15/84

Revision :	0	1	2	3
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The NRC staff also compared T-B and EBASCO procedures for corrective actions and for processing nonconformances (NCRs), DNs, and DRs, with the applicable requirements of the ASME code, ANSI 45.2, and 10 CFR Part 50, and found them to be acceptable. The use of speed letters and memos was not addressed in these procedures and the NRC staff concluded, after several interviews, that speed letters and memos were used to provide information or to request information between EBASCO and its subcontractors.

The NRC staff assessed the following specific allegations:

Allegation A-290 alleged that after a Deficiency Report was transmitted to Tompkins-Beckwith, it was questionable as to how corrective actions, including walk downs, were accomplished. (The NRC staff reviewed this allegation concurrently with Allegation A-33.) The staff determined that Quality Assurance Instruction (QAI) 9 provides adequate instructions for forwarding the deficiencies discovered during records review to the responsible organization for resolution. It also included actions to be taken by the reviewer should a deficient item require resolution through the implementation of an NCR or DN. However, the staff finds that the procedures lack instructions for followup action or resolution of these deficiencies to assure proper closure. Additionally, the NRC staff found that T-B's procedures did not address how these types of deficiencies would be resolved or closed.

Allegation A-301 alleged that about 40% of the changes made to records were not done correctly for both programmatic and hardware deficiencies. Most of these deficiencies were identified at least on a speed letter or on an EBASCO Deficiency Report. In many cases, the change made was not adequate to correct the deficiency. (See Allegation A-05 for examples of questionable disposition and inadequate or incomplete closure.) Based on a sample review of the packages and deficiency reports relating to the package, the NRC staff believes that there are still open deficiency reports.

The NRC staff also reviewed T-B DNs in Allegation A-302.

Potential Violations: The lack of an adequate procedure is a violation of 10 CFR 50, Appendix B, Criterion V, and the ASME Code. 4

Actions Required: LP&L shall ~~prior to fuel load.~~

1. Review all Ebasco 9.2 deficiency reports to assure proper closure.
2. Correct all problems encountered in DRs not properly closed.

References

- See Item No. 6 in the Enclosure to Mr. D. Eisenhub letter of 6/13/84 to J.M. Cas (NPD).*
1. Tompkins-Beckwith, Inc., Nonconformance and discrepancies Procedure 12.
 2. EBASCO Procedure for: Corrective Action, ASP III.7.
 3. Quality Assurance Instruction (QAI) 9 - Review and Handling of Constructions-Installation Records.
 4. Quality Assurance Instruction (QAI) 19 - Processing of Discrepancy Notices (DNs and Engineering Discrepancy Notices (EDNs).
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Task Management

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seen this one.*
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[Signature]

Task: Allegations A-290 and A-301

Reference No.: 4-84-A-06-171; 4-84-A-06-179

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The NRC staff also compared T-B and EBASCO procedures for corrective actions and for processing nonconformances (NCRs), DNs, and DRs, with the applicable requirements of the ASME code, ANSI 45.2, and 10 CFR Part 50, and found them to be acceptable. The use of speed letters and memo was not addressed in these procedures and the NRC staff concluded, after several interviews, that speed letters and memos were used to provide information or to request information between EBASCO and its subcontractors.

The NRC staff assessed the following specific allegations.

Allegation A-290 alleged that after a Deficiency Report was transmitted to Tompkins-Beckwith, it was questionable as to how corrective actions, including walk downs, were accomplished. (The NRC staff reviewed this allegation concurrently with Allegation A-33.) The staff determined that Quality Assurance Instruction (QAI) 9 provides adequate instructions for forwarding the deficiencies discovered during records review to the responsible organization for resolution. It also included actions to be taken by the reviewer should a deficient item require resolution through the implementation of an NCR or DN. However, the staff finds that the procedures lack instructions for followup action or resolution of these deficiencies to assure proper closure. Additionally, the NRC staff found that T-B's procedures did not address how these types of deficiencies would be resolved or closed.

Allegation A-301 alleged that about 40% of the changes made to records were not done correctly for both programmatic and hardware deficiencies. Most of these deficiencies were identified at least on a speed letter or on an EBASCO Deficiency Report. In many cases, the change made was not adequate to correct the deficiency. (See Allegation A-05 for examples of questionable disposition and inadequate or incomplete closure.) Based on a sample review of the packages and deficiency reports relating to the package, the NRC staff believes that there are still open deficiency reports.

The NRC staff also reviewed T-B DNs in Allegation A-302.

Potential Violations: The lack of an adequate procedure is a violation of 10 CFR 50, Appendix B, Criterion V, and the ASME Code.

Actions Required: LP&L shall prior to fuel load.

1. Review all Ebasco 9.2 deficiency reports to assure proper closure.
2. Correct all problems encountered in DRs not properly closed.

References

1. Tompkins-Beckwith, Inc., Nonconformance and discrepancies Procedure 12.
2. EBASCO Procedure for: Corrective Action, ASP III.7.
3. Quality Assurance Instruction (QAI) 9 - Review and Handling of Constructions-Installation Records.
4. Quality Assurance Instruction (QAI) 19 - Processing of Discrepancy Notices (DNs and Engineering Discrepancy Notices (EDNs).
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The NRC staff assessed the following specific allegations.

Allegation A-290 alleged that after a Deficiency Report was transmitted to Tompkins-Beckwith, it was questionable as to how corrective actions, including walk downs, were accomplished. (The NRC staff reviewed this allegation concurrently with Allegation A-33.) The staff determined that Quality Assurance Instruction (QAI) 9 provides adequate instructions for forwarding

the deficiencies discovered during records review to the responsible organization for resolution. It also included actions to be taken by the reviewer should a deficient item require resolution through the implementation of an NCR or DN. However, the staff finds that the procedures lack instructions for followup action or resolution of these deficiencies to assure proper closure. Additionally, the NRC staff found that T-B's procedures did not address how these types of deficiencies would be resolved or closed.

Allegation A-301 alleged that about 40% of the changes made to records were not done correctly for both programmatic and hardware deficiencies. Most of these deficiencies were identified at least on a speed letter or on an EBASCO Deficiency Report. In many cases, the change made was not adequate to correct the deficiency. (See Allegation A-05 for examples of questionable disposition and inadequate or incomplete closure.) Based on a sample review of the packages and deficiency reports relating to the package, the NRC staff believes that there are still open deficiency reports.

The NRC staff also reviewed T-B DNs in Allegation A-302.

Potential Violations: The lack of an adequate procedure is a violation of 10 CFR 50, Appendix B, Criterion V, and the ASME Code. 4

Actions Required: LP&L shall prior to fuel load.

1. Review all Ebasco 9.2 deficiency reports to assure proper closure.
2. Correct all problems encountered in DRs not properly closed.

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