

REVISION 0  
06/13/84

SSER

Task: Allegations A-253, A-254, A-257

Reference No.: 4-84-A-06-139, 140a, 141

Characterization: It is alleged that Vendor Records Reviewers were not qualified to assure requirements were met, and that some vendor records ~~are~~<sup>were</sup> bad, particularly those for Bergen-Patterson, a subcontractor of Dravo.

Assessment of Allegation: The implied significance of the allegation ~~is~~<sup>was</sup> that QA records reviewed and approved by unqualified reviewers could place the records in question. Inadequate QA records for Bergen-Patterson components could place the acceptability of those items in question.

The NRC staff methodology for reviewing the allegation was as follows: (1) the quality records supervisor was interviewed; (2) the appropriate quality assurance procedures were reviewed; (3) the applicable purchase orders and specifications were reviewed; (4) applicable quality records packages for pipe supports were reviewed for compliance with the purchase order and specification; (5) Ebasco and NRC Audits of Bergen-Patterson Pipe Support Co. were reviewed; and (6) the Ebasco-approved Vendor List was reviewed.

For the details of allegations pertaining to Dravo and CB&I see Allegation A-292.

The NRC staff assessment of this allegation revealed that it was probably based on a lack of understanding of the responsibility of the quality records section. By procedure, the responsibilities of the quality records section ~~is~~<sup>are</sup> to check each quality records package to assure that it ~~is~~<sup>was</sup> legible and complete. If a package ~~is~~<sup>was</sup> not complete or ~~is~~<sup>was</sup> illegible, a deficiency report ~~is~~<sup>was</sup> filled out, logged in the master tracking system, and issued for corrective action.

The primary responsibility for reviewing vendor records rests with vendor quality assurance representatives and the Project Quality Assurance Engineers, who are assigned to particular engineered components. In addition, when necessary, documents ~~are~~<sup>are</sup> sent to engineering disciplines for review. For example, seismic analyses ~~are~~<sup>are</sup> reviewed by the appropriate seismic engineering discipline. An NRC staff sample review of quality records packages revealed that Ebasco Vendor Quality Assurance representatives were reviewing all documents, performing all required quality checks, and completing all reports legibly and completely. This was confirmed by the Quality Records review group.

The results of an April 1982, inspection of Bergen-Patterson, by NRC was reviewed. The inspection covered the engineering and design functions of the Bergen-Patterson offices in Pittsburgh, Pennsylvania and revealed that Bergen-Patterson had an acceptable QA program covering design and engineering. The NRC inspection was evidence that Bergen-Patterson's C of Cs were valid for engineering and design of pipe supports.

An NRC review of the Ebasco Approved Vendor List revealed that audits of all Bergen-Patterson facilities had been performed including the manufacturing facility at Laconia, New Hampshire. In addition, the approved vendor list showed that the Laconia facility possessed an ASME Code stamp (NPT)N-1217, which expires September 8, 1984. An audit of the Laconia facility dated January 1983 was also reviewed. The Audit covered the Bergen-Patterson QA program compliance with the purchase specification. The results of the audit demonstrated that Bergen-Patterson has a quality assurance program that meets all requirements of the purchase specification. Sufficient evidence was provided to verify that the manufacturing of pipe supports complied with the C of C.

In conclusion, the staff's review of objective evidence revealed that the allegation has neither safety significance nor generic implications.

[ Potential Violations: None. ]

Actions Required: None.

#### References

1. Interview with [Lynn Lubuski], Quality Records Supervisor on May 18, 1984.
2. Ebasco Quality Assurance Instructive Number 1 (QAI-1) Quality Assurance Records Management Instruction, Revision 10, February 7, 1984.
3. Purchase Order for Piping and Supports NY-403433.
4. Ebasco Specification for Piping and Supports LOU-1564.100.
5. Certificate of Compliance for Support SIRR-219.
6. Certificate of Compliance for Support SIRR-305.
7. Certificate of Compliance for Support SIRR-836.
8. Certificate of Compliance for Support SIA-13.
9. PO NY 403450, MRIR 7900008.
10. PO NY 403431, MRIR 7711721.

11. WP36330 , MRIR 81 04091
12. PO NY 403509, MRIR 7801941.
13. QA-II-5, Supplier Surveillance
14. QA-III-5, Supplier/Contractor Surveillance
15. Ebasco interoffice correspondence, to R. Devine from J. M. Burghoffer/R. Hynes, comments of BPPC, Pittsburgh, PA by NRC, June 1, 1982.
16. LEtter from U. Potapovs, Chief Vendor Program Branch, NRC, Region IV to Bergen-Patterson (Results of NRC Audit), August 11, 1982, Docket No. 99900777/82-01.
17. Ebasco Services Inc., Approved Vendor List, December 30, 1983, Revision 18.
18. Companies Holiday Nuclear Certificates and Authorizations, May 1984.
19. Ebasco Services Inc., Quality Assurance Engineering Procedure QA-P.9. Quality Assurance Vendor Evaluation.
20. Letter from M. Shusterman, Ebasco Services, Inc., to R. Stephens, Bergen-Patterson Pipe Support Co. reporting results of Audit, E1019/34.1, January 27, 1983.

Statement Prepared by:

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