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TO ANSI 45.2.6 - 1973

FILE

*DRAFT
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Task: Allegation A-160 and A-161

Reference Number: 4-84-A-06-55, 4-84-A-06-56

Characterization: It is alleged that support structures for instrumentation cabinets mounted on grating inside the reactor containment building (RCB) were fabricated with materials which lack heat number traceability; that the weld rods used on these supports are not traceable; and that welding on the instrumentation cabinet supports was performed by unqualified welders and inspected by an uncertified inspector.

Assessment of Allegation: In examining the allegation concerning instrument cabinet supports, the NRC staff reviewed copies of Requisition on Warehouse (ROW's) forms which tie directly to Material Receiving Inspection Reports (MRR's). From the MRR, the purchase order ^{was} can be identified. These records allow the material used in the instrumentation cabinet supports to be traced. Further, all support steel for the instrument cabinets was purchased as safety-related. This item has neither safety significance nor generic implications.

Review of the allegation that the weld rods used on instrument cabinet supports were not traceable indicated that inspection reports listed the heat number or the lot number of the weld rods used so that weld rods were indeed traceable. There ^{was} no safety significance to this issue and no generic implications.

The NRC staff reviewed the allegation that welding on structural supports for instrumentation cabinets inside the RCB was performed by unqualified welders. NCR W3-7549 was written after the allegation and ^{is} ~~is a~~ good example of the issue in concern where LP&L's review has identified issues. The NRC staff reviewed qualifications for all welders who worked on the instrumentation cabinet supports.

The NCR indicated that two welders performed work in welding positions for which they were not qualified.

The licensee ^{was} ~~is~~ committed to American Welding Society, AWS D1.1-1972 for welder qualification. A review of inspection reports indicates that only one welder may have been unqualified.

A review of the inspection records indicates that on many supports there were more than two welders performing work. This review only indicates that the welder was qualified for the welding he was performing by QC checking "satisfactory" in the welder qualification check box. There ~~was~~ ^{was} no further action.

identified. The Ebasco record's review group states that all J. A. Jones Construction Company's documentation may not be completely assembled at present. They strongly feel that there is documentation that proves that the welding on the instrument cabinet supports was performed by welders working in positions for which they were qualified.

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A QC inspector from J. A. Jones Construction Company stated that it was very common for one welder to work only on the portion or position on a structural member for which he was qualified and for another welder to complete other portions of the weld for which he was qualified.

A review of this issue indicated that welding on the instrumentation cabinet structural supports in question may have been performed by welders qualified in the proper position, however, ~~at this time there is not an inspection record available to verify that this is true.~~

The NRC staff reviewed the allegation that an unqualified QC inspector was examining welds on instrumentation cabinet supports. The licensee ^{was} committed to ANSI N45.2.6-17-1973 "Qualification of Inspection, Examination and Testing Personnel for the Construction Phase of Nuclear Power Plants." A review of J. A. Jones Construction Company's QA manual, Attachment F, "Quality Assurance Personnel Training and Certification Program" dated June 18, 1975, indicates that it ^{was} in compliance with ANSI N45.2.6-1973. A review of the QC inspector's qualification records indicates that he was qualified and certified to perform the inspection.

The item of safety significance arising from these ^{was} allegations ~~is~~ that the quality of welds made on safety related supports ^{was} indeterminate. This appears to be an isolated case not previously identified by LP&L and, therefore, has no generic implications.

Potential Violations: Missing inspection records for welding performed on the instrumentation cabinet supports indicate that Criterion XVII "Quality Assurance Records," Appendix B, has potentially been violated. Criterion XVII states that sufficient records shall be maintained to furnish evidence of activities affecting quality.

Contrary to the above, the J. A. Jones Construction Company apparently does not have sufficient inspection records to prove that qualified welders performed work on instrumentation cabinet supports on cabinet numbers C-2B, C-6A, C-8 and C-9. Failure to assure that suitable proficiency is maintained and achieved by personnel performing activities affecting quality, in this case inspector certification, indicate that procedures affecting quality have not been fully accomplished and apparently violates Criterion V.

Actions Required: LP&L shall attempt to locate the missing documents and determine if the welders were appropriately certified for all of the weld positions they utilized. If the documentation cannot be located, appropriate action must be taken to assure the quality of the welds for the cabinet supports.

See Item No. 9 in the Enclosure to the
D. Eisenbach letter of 6/13/84 to J.M. Cim (LP&L).

References

1. NCR-W3-7549
2. J. A. Jones Construction Company Quality Assurance Program for the Construction Phase of Nuclear Power Plants, "Attachment F," Quality Assurance Personnel Training and Certification Program, dated June 18, 1975.
3. J. Pertuit, Personnel File.
4. E. Toler, Welder #68 Qualifications.
5. C. Doss, Welder #79 Qualifications.
6. ANSI N45.2.6-1973 "Qualifications of Inspection, Examination, and Testing Personnel for the Construction Phase of Nuclear Power Plants."
7. Regulatory Guide 1.58, "Qualification of Nuclear Power Plant Inspection, Examination, and Testing Personnel."
8. Nuclear Project Operating Procedure #POP-N-702, Rev. 4, "Personnel Training, Qualification and Certification," dated October 15, 1975,
9. Procedure W-SITP-14, Rev. 4, "Welding Inspection," dated March 30, 1977,
10. FCR-IC-10, Rev. 3, dated August 28, 1979.
FCR-IC-P-1, dated January 7, 1980.
FCR-IC-42, Rev. 1, dated May 21, 1979.
FCR-IC-27, Rev. 1, dated April 23, 1979.
FCR-IC-44, dated May 3, 1979.
FCR-IC-45, dated May 15, 1979.

Statement Prepared By: _____
C. E. Johnson _____ Date _____

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Team Leader _____ Date _____

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Task: Allegation A-160 and A-161

Reference Number: 4-84-A-06/55, ~~4-84-A-06-56~~

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The NRC staff reviewed the allegation that welding on structural supports for instrumentation cabinets inside the RCB was performed by unqualified welders. NCR W3-7549 was written after the allegation and is a good example of the issue in concern where LP&L's review has identified issues. The NRC staff reviewed qualifications for all welders who worked on the instrumentation cabinet supports. documents

The NCR indicated that two welders performed work in welding positions for which they were not qualified. ✓

The licensee is committed to American Welding Society (AWS) D1.1-1972 for welder qualification. A review of inspection reports indicates that only one welder may have been unqualified. ✓

A review of the inspection records indicates that on many supports there were more than two welders performing work. This review only indicates that the welder was qualified for the welding he was performing by QC checking "satisfactory" in the welder qualification check box. There is an inspection report for each welder, but the exact weld location each welder made was not identified. The Ebasco record's review group states that all J. A. Jones Construction Company's documentation may not be completely assembled at present. They strongly feel that there is documentation that proves that the welding on the instrument cabinet supports was performed by welders working in positions for which they were qualified. ✓
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A QC inspector from J. A. Jones Construction Company stated that it was very common for one welder to work only on the portion or position of a structural member for which he was qualified and for another welder to complete other portions of the weld for which he was qualified.

A review of this issue indicated that welding on the instrumentation cabinet structural supports in question may have been performed by welders qualified in the proper position; however, at this time there is not an inspection record available to verify that this is true.

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The item of safety significance arising from these allegations is that the quality of welds made on safety-related supports is indeterminate. This appears to be an isolated case not previously identified by LP&L and, therefore, has no generic implications.

Potential Violations: Missing inspection records for welding performed on the instrumentation cabinet supports indicate that Criterion XVII, "Quality Assurance Records," Appendix B, has potentially been violated. Criterion XVII states that sufficient records shall be maintained to furnish evidence of activities affecting quality.

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Actions Required: LP&L shall attempt to locate the missing documents and determine if the welders were appropriately certified for all of the weld positions they utilized. If the documentation cannot be located, appropriate action must be taken to assure the quality of the welds for the cabinet supports.

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