REVISION 3
08/29/84

SSER

Task: Allegation A-126, A-291

Reference No.: 4-84-A-06/21, 172

Characterization: It is alleged that Tompkins-Beckwith (T-B) did not maintain material traceability on the supplemental steel used with pipe hangers and supports. The supplemental steel refers to additional steel used to install pre-fabricated pipe hangers and supports.

Assessment of Allegation: Bergen-Patterson (B-P) furnished pre-fabricated piping supports and hangers. EBASCO furnished the supplemental structural steel for use by T-B during installation of the piping hangers and supports.

The supports and supplemental material were designed to Seismic Category I requirements. 10 CFR 50, Appendix B quality assurance requirements allows identification of an item to be maintained by records traceable to the item. As a result, Certificates of Compliance furnished by the ~~suppliers~~ suppliers verified that the material furnished was properly certified in accordance with the applicable ASTM Specifications.

The EBASCO Material Inspection Receiving Report (MIRR) was used to verify that the correct material was received. A Requisition on Warehouse (ROW) was used by T-B to obtain release of the material from EBASCO.

The initial T-B program was established to provide traceability of the paint to be used on the supplemental steel. A material control number was steel stenciled on each item listed on the ROW. If the material was cut into smaller pieces, the number was to be transferred accordingly.

After number stamping, the material was painted by a subcontractor. Different colored paint was used with yellow signifying non-safety non-permanent material. The other colors used designated safety related material.

In 1978, T-B agreed to a contract change with EBASCO to extend the paint material traceability system to also include steel traceability. Because the change came after the original program had been in operation, a number of implementation problems occurred and providing full steel traceability proved difficult.

In late 1983, the contract between EBASCO and T-B was changed to reflect a decision by EBASCO to abandon attempts to provide supplemental structural steel traceability using material control numbers. The supplemental structural steel certification program continued to be in effect as it had been throughout the project.

apply. Section VIII of this specification [redacted]

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REVISION 1
06/21/84

SSER

Task: Allegations A-149; A-151; A-152; and A-153

Reference Number: 4-84-A-06/44/46/47/48

Characterization: The allegation is that four nonconformance reports (NCRs) were signed by QC inspectors performing work prior to their being certified. It is further alleged that one NCR shows a lack of inspection reports for installation of seismic Category I stairs.

Assessment of Allegation: In a review of records for this allegation, the NRC staff identified seven NCRs in an EBASCO QAIRG letter that contained deficiencies that were undetected in previous record reviews. Four of these NCRs (W3-5563, W3-5564, W3-5565 and W3-5973) were the ones alleged to contain inspections performed by J. A. Jones QC inspectors prior to their certifications. The other three were addressed in Allegation A-416. These NCRs were reviewed to answer any deficiency and to evaluate the disposition and corrective action required should the allegation prove true. Review of the Ebasco QC inspectors certifications were also performed to assure qualification of the applicable inspecting personnel.

NCR W3-5563, dated January 24, 1983, involved bolting on the bridge crane of the fuel handling building (FHB). It was signed-off by a J. A. Jones Construction Company trainee prior to that person's certification as a Level I inspector. Attachments to NCR W3-5563 indicated that the trainee inspected the work on August 27 and 28, 1979 and on November 6, 1979. The individual in question was certified as a trainee on July 9, 1979 and certified as a Level I inspector on November 7, 1979. Original bolting deficiencies were documented in an NCR in 1979. The bolting inspection was originally signed off in the presence of a Level II inspector, who countersigned the inspection reports on February 4, 1983.

The recommended disposition was signed on January 31, 1983, and corrective action was completed in accordance with recommended disposition and signed off on February 4, 1983.

The corrective action taken was not appropriate. Reinspection should have been performed by a certified inspector and properly signed-off by EBASCO QC. The incident was reported to NRC as PRI Report 111, and later designated as SCD 78.

NCR W3-5564 dated January 24, 1983, involveD lack of records to verify the inspection of bolting and welding by J. A. Jones on Seismic Category I stairs between elevations -34.75 and -8.0' in the Fuel Handling Building.

The recommended disposition included inspection of welds and bolted connections by EBASCO QC. The disposition was signed on February 2, 1983 and revised on March 15, 1983, since the inspection revealed that several of the bolted connections were loose and that "in most of the connections, the bolts had not been tightened sufficiently to bring the mating surfaces in full contact."

All bolting was completed and inspected on September 23, 1983. Welding repairs for four welds were completed and inspected on July 26, 1983. The NCR was signed off by the QAE on November 7, 1983. Dispositioning of the NCR was not acceptable in regard to inspection of welds without removing the paint. The paint precludes adequate visual inspection of the welds.

The NRC staff also checked the deficiency for reportability in regard to 10CFR50.55(e). The stairs were determined to be in an area where they could not affect safety-related structures, systems, or components if they failed and therefore this deficiency was not reportable.

NCR W3-5565, dated January 24, 1983, involves witnessing and acceptance of reeving of the FHB bridge crane by a QC inspector trainee who was not certified as a Level I inspector at the time of inspection.

The QC inspector was certified as a trainee for Structural and Reinforcing Steel on July 9, 1979 and for Level I, Concrete, Structural and Reinforcing Steel, on November 7, 1979. Inspections were performed on August 15, 17 20, 21, and 22, 1979.

The recommended disposition was for EBASCO QC to reinspect the work by a certified inspector and process the required documentation.

The manufacturer adjusted, checked and tested the crane during January 1983. The certification was signed off by a start up engineer on January 24, 1983 (late entry on warning bell made February 4, 1983). Although the staff reviewed the start up engineer's certification and found it adequate, the inspection performed by the QC inspector was not in the file. Final corrective action was concluded and signed off by the QAE on July 11, 1983. The deficiency was reported to the NRC as PRI-III (later designated as SCD-78).

NCR W3-5973, dated March 28, 1983, involved the welding inspection of a FHB tornado door frame which was performed by an inspector prior to his being certified as a QC inspector, Structural/Reinforcing Steel Level I or a Visual Inspector. He was certified as a Level I, Structural/Reinforcing Steel on August 24, 1977, and Visual Inspector on October 18, 1977. The inspection was made during the period August 3, 1977 through October 14, 1977. Also, there were no inspection reports for weld repairs made on welds on the door frame. The weld repairs were a result of work done to plumb the door frame as documented in an NCR in 1977.

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The recommended disposition was to reinspect the weld areas and document the results. If repairs were required, they were to be made in accordance with applicable procedures and reinspected. Since no weld repairs were required, the final corrective action was "use-as-is."

Review of the certifications of the responsible inspectors showed no deficiencies other than those above.

The NRC staff's review of this issue indicated that the allegation is valid regarding inspection by personnel prior to their certification, and incomplete records identified in these NCRs, but the deficiencies noted in the records reviewed will not affect plant safety. Evaluation/inspection of the issues identified no hardware problems, except for NCR W3-5564, where it was found that a set of FHB stairs had several bolting connections which were loose, and that in most connections the bolts had not been tightened to bring the mating surfaces in full contact. Inspection of the stairs showed that they were not located in an area where their failure would have caused damage to safety-related equipment. The records reviewers had considered the generic aspects of inspector certification. The reviewers pointed out discrepancies in regard to inspector certification and incomplete or missing records. The NRC staff concludes that this allegation has no safety significance or generic implications.

Potential Violation: Each NCR represents a violation of contractor procedure requirements that, in turn, represents violation of 10 CFR 50, Appendix B, Criterion XVI.

Actions Required: None.

References

1. Letter from G. Hill to J. Cyzrko dated June 6, 1983, Subject: Review of Seismic Class I Concrete Records.

2. NCR W3-5563, dated January 24, 1983.

3. NCR W3-5564, dated January 24, 1983.

4. NCR W3-5565, dated January 24, 1983.

5. NCR W3-5973, dated March 28, 1983.

6. NCR W3-1728, dated November 5, 1979.

7. NCR W3-545, dated August 3, 1977

8. Certifications of Inspectors involved with NCRs.

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9. EBASCO Procedures WQC-101 and 169.

10. EBASCO Drawings LOU 1564 G-850 and 1564 3845.

11. ANSI N45.2.6-1973

Statement Prepared by: _____ _____
W. A. Crossman Date

Reviewed By: _____ _____
Team Leader Date

Reviewed By: _____ _____
Site Team Leader(s) Date

Approved By: _____ _____
Task Management Date