

SSER

Task: Allegations A-114, A-144, and A-154

Reference No.: 4-84-A-06-9, 39, and 49

Characterization: It is alleged that the disposition for Nonconformance Report W3-5997 concerning the clam shell filter blanket under the nuclear plant island was not satisfactory.

Assessment of Allegation: Ebasco's disposition for Nonconformance Report W3-5997 was evaluated by the NRC staff and found satisfactory, with the exception of one part of Item IV, "Certification of Personnel." Item IV dealt with an individual who performed inspections without proper certification. Ebasco's response to the nonconformance report was that the personnel cited were qualified when they performed the inspections although employer certification records did not exist. The staff found this response incorrect because one QC inspector from J. A. Jones had no testing or inspection experience prior to coming to Waterford Unit 3 (See Allegation A-130). The other personnel cited had satisfactory credentials and were assessed to be acceptable. The J. A. Jones QA Program Manual stated that training and education requirements were not to be treated as absolute when other factors provided reasonable assurance that a person can competently perform a particular task. In this instance, the manual allowed the experience requirement for one inspector to be waived.

The Ebasco site soils engineer who was at the Waterford site when the clam shell filter was placed had the responsibility for the filter test program and for all subsequent engineering questions relative to construction and engineering activities at the site. The NRC staff review of these activities revealed that the EBASCO site soils engineer was involved in QC inspections at relevant control points for the inspector in question. Accordingly, the staff was confident that the EBASCO site soils engineer would have become aware of construction inspection problems had they occurred and resolved them. This site soils engineer also aided in the disposition of Nonconformance Report W3-5997.

This allegation has neither safety significance nor generic implications.

Potential Violations: There is a violation of ANSI N45.2.6 which would leave some doubt on the validity of the inspections made by the individual who did not meet all the qualification requirements. This is contrary to 10 CFR 50, Appendix B, Criterion V, which states that activities affecting quality shall be accomplished in accordance with the quality procedures.

Actions Required: See Allegations A-110, A130, and A148 for actions required.

## References

1. Nonconformance Report W3-5997

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## Task Management

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