

U.S. NUCLEAR REGULATORY COMMISSION
REGION III

CONGRESSIONAL BRIEFING

FOR

MARBLE HILL NUCLEAR GENERATING STATION

February 25, 1983

J. J. HARRISON
Senior Resident Inspector

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Public Service Indiana

Marble Hill Nuclear Generating Station

Chronology of Events Leading to the CAL of February 2, 1983, on
Problems in the Areas of Electrical Work

April to June, 1982

The licensee and the electrical contractor, Commonwealth-Lord Joint Venture (CLJV), both identified numerous quality problems during this time period involving electrical safety related activities. As a result of these problems the electrical contractor imposed a stop-work on these activities effective June 4, 1982. Problems identified included for an example workers not following procedures and work proceeding without travelers (work instructions) being issued.

June to October, 1982

The electrical contractor made extensive revisions to his overall QA program including:

- Reorganization of the project and corporate structures, including QA/QC
- Evaluating and rewriting the QA Program
- Evaluating and rewriting QA/QC procedures and work procedures
- Contracting an outside consultant to evaluate the overall QA/QC program
- Evaluating and inspecting of work and inspection activities completed prior to the stop-work
- Hiring additional and more qualified QA/QC personnel

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. Retraining of all project personnel, including craft
As various tasks were completed the work activities were allowed
to increase until on October 29, 1982, the normal construction
activities were allowed to resume. All the program changes
were approved and monitored by the licensee.

July 19-31, 1982

The NRC Resident Inspector reviewed the stop-work order
and corrective actions being taken and found these actions
to be adequate (NRC Inspection Report Nos. 546/82-13; 547/82-13).

September 14-17, 1982

Inspection by a Region III Electrical Inspector revealed no
problems with traveler control or material traceability; no
noncompliances were issued (NRC Inspection Report Nos. 546/82-17;
547/82-17).

January 21, 1983

Mr. T. Dattilo (Attorney for Save-The-Valley) and the alleged
contacted Region III C. Williams, Chief Electrical Section
and made four basic allegations:

- . Loss of material traceability and not processing nonconform-
ance reports
- . Travelers (work instructions) were routinely altered and
notes added without proper review and approval
- . The licensee failed to submit Construction Deficiency
Report (a 50.55(e)) for documenting the deficiency. This
is required by Title 10 Law.

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- . The alleged was fired because he had written nonconformance reports on the above concerns

January 24, 1983

The NRC Sr. Resident Inspector (J. Harrison) and two RIII Electrical Inspectors (R. Love and R. Mendez) met with Mr. Dattilo and the alleged in Mr. Dattilo's office. The meeting began at 11:15 and lasted until 12:45; approximately 1.5 hours. The following basic allegations were made:

1. Traceability of material not being maintained; many examples were given.
2. Traveler (work instructions) were being improperly revised without proper review and approval; many examples followed.

Note:

The above allegations were detailed in a memo to Region III files dated February 11, 1983, for NRC tracking purposes a total of thirteen allegations were identified and reviewed.

January 24-28, 1983

A NRC special inspection was conducted, confirming in part the allegations. The inspection (NRC Inspection Report Nos. 546/83-01; 547/83-01) identified five potential items of noncompliance violating 10 CFR 50, Appendix B:

- . Criterion V - Procedures were not properly implemented
- . Criterion XV - Nonconforming items were not tagged
- . Criterion XVI - Positive corrective action was not taken to correct the problem or to prevent recurrence, similar problems were identified from April to July, 1982

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- . Criterion III - Design requirements, including some specification and regulatory, were not passed on in procedures and other requirements were not properly documented.
 - . Criterion XIV - Failure to establish suitable measures to assure inspection and/or test status of items or equipment.

January 28, 1983

The licensee issued a Stop-Work Order on the electrical contractor, Commonwealth-Lord Joint Venture.

February 2, 1983

The confirmation Action Letter (CAL) was issued to PSI management by the NRC on this date.

February 3, 1983

Mr. T. Dattilo contacted Region III, C. Williams, and gave permission to reveal the allegers name to the licensee for the purpose of allowing personnel corrective measures to be initiated. I notified Mr. B. Petro, Vice-President Nuclear Services, of the allegers name Mr. Melbert Landers.

February 7-9, 1983

Mr. T. Dattilo (Mr. M. Landers Attorney), Public Service Indiana and Commonwealth-Lord attorneys had several separate discussions to resolve Mr. Landers dismissal and/or reinstatement. The issue remains unresolved to-date and continues to be under further consideration by all parties.

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February 2-11, 1983

The licensee conducted an in-depth audit of Commonwealth-Lord JV quality program. This four man team audited for eight days resulting in the following findings:

- . Eleven program deficiencies
- . Nine nonconformances to the program
- . Four concerns

This audit further confirms the allegations and also identified additional problems.

February 11, 1983

The licensee reported a potential 50.55(e), Construction Deficiency Report, based on the independent internal audit of this problem area. This audit afforded sufficient information to define the problems and depth of each to be evaluated and was deemed reportable.

February 25, 1983

The licensee presented their Action Plan In Response to NRC Confirmatory Action Letter to members of the Region III staff at the Marble Hill site. The plan was found to be generally acceptable; major changes to be included were (1) timeliness of licensee audits and (2) establishment of NRC hold points.

The Region III staff is awaiting licensee action to proceed in accordance with the Confirmation Action Letter.

Results-Some Problems were Identified:

1. Problem Perspective:

- .The problem is isolated to some activities in the electrical area.
- .Activities affected are only in segments of the electrical work.
- .Problems duration was for a limited amount of time; approximately four (4) months or less.
- .Actions that were taken are extremely timely for percent of activities inprocess versus the total to be accomplished, for example;

<u>Items</u>	<u>Safety Related Activities</u>		
	<u>To be installed</u>	<u>Inprocess</u>	<u>Inspected</u>
Hangers	5,550	1,250	800
Cable Tray (L.F.)	67,000	6,200	600

2. Problem Cause:

- .Revised program, as a result, was somewhat inadequate; i.e., training
- .The written program, although somewhat cumbersome, could have been successful if it had been properly implemented
- .Corrective action on previously identified problems that was taken by the contractor was inadequate
- .Increase in work activities, just prior to and following the total restart (October 29, 1982), lacked proper quality program implementation that was commensurate with the additional construction activities; i.e., schedule prevailed over quality
- .Numerous personnel changes caused instability; managers were dismissed; replaced managers were largely contract employees;

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some reduction in contract employees occurred prior to program becoming stable; positions vacated were not adequately filled but left open

.PSI failed to adequately control the overall process; that is, allowing work to resume without corrective action being completely implemented

3. Allegation Status

Two major allegations were subdivided into thirteen specific allegations for tracking purposes. Of the thirteen total allegations the NRC special inspection substantiated only two and the licensee's indepth-audit substantiated also the same two. The NRC however identified some additional problems and issued a total of five noncompliances. The licensee's audit identified an additional eighteen problems for a total of twenty and four additional concerns. In addition several allegations were confirmed; however, these allegations had no technical merit, that is a regulatory, design or quality program requirement was not violated since it did not exist.

Summary:

Although numerous problems were identified by the alleged, the NRC, and the licensee, the NRC continues to have confidence that the quality assurance program at Marble Hill is sound. These identified problems were isolated to some activities of one contractor and early detection and correction is really the key issue. We are confident that the NRC's inspection program would have detected these problems in an inspection that was scheduled in the same time frame as the allegations, in fact the same inspection team would have been performing that inspection. The NRC will assure through the Confirmation Action Letter and additional inspections that these problems are properly resolved.

The licensee has committed to positive philosophy on quality assurance and has provided additional assurance to the NRC that corrective action will be complete; to correct the problem and to prevent recurrence. Public Service Indiana has been very responsive to NRC concerns and as well as their own quality problems assuring total dedication to a quality constructed and safe plant.

It should be noted that when building something as large and complex as a nuclear plant mistakes will be made and these problems are compounded by the human element. The key point is that these problems be properly identified and appropriate corrective action is taken.

Our ultimate goal is of course to protect the health and safety of the public and we the NRC will strive to achieve that goal.