

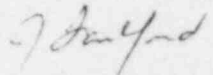


UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA ST., N.W., SUITE 3100
ATLANTA, GEORGIA 30303

NOV 28 1984

MEMORANDUM FOR: A. R. Herdt, Chief, Engineering Branch, DRS
A. F. Gibson, Chief, Operations Branch, DRS
THRU: P. Bemis, Acting Director, Division of Reactor Safety
FROM: J. B. Lankford, Investigation/Allegation Coordinator
SUBJECT: SHEARON HARRIS - ALLEGED DISCRIMINATION AND POSSIBLE
HANGER DEFICIENCIES
CASE NO: RII-84-A-0143

The enclosure contains a draft affidavit from Mr. Chan Van Vo which provides additional information regarding the alleged improper cold pulling of the steam generator feed water pump. The affidavit is provided for your use in your review of the allegation.


J. B. Lankford

Enclosure:
Ltr dtd 11/25/84, Runkle to Kelley

cc:
J. A. Olshinski, DRP
J. J. Blake, ENG/DRS
D. Verrelli, PB1/DRP

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PDR FOIA
GUILD85-173 PDR

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A F F I D A V I T

My name is Chan Van Vo. I am also known as Van Vo Davis. I am giving this statement to Robert Guild, Attorney-at-Law, of Charleston, South Carolina, who has identified himself to me as a representative of the Government Accountability Project. I have been asked to provide further information to the Atomic Safety and Licensing Board of the Nuclear Regulatory Commission about the significance of the improper cold pulling and misalignment of the Steam Generator Feed Water Pump; and CP&L's mishandling of my efforts to identify and properly correct this nonconformance.

2. I repeat my professional opinion expressed in my October 6, 1984, Affidavit that the effective function of these pumps, valves and piping are nuclear safety significant. At the time I attempted to document the deficient fit-up of the Feed Water piping and the resultant stress-induced misalignment of the pump in August 1982 -- and during the entire course of construction of the Harris Plant until then-- the Feed Water system, its piping, pipesupports, valves and pumps, were classified by the Architects/ Engineers, Ebasco Services, Inc., by CP&L, and by their contractors as "Safety Class 4/ Seismic Class I," an acknowledgement of its nuclear safety significance. This classification applied to the Feed Water system in the Harris Turbine Building. Conformance to the Commission's 10 CFR Part 50, Appendix B, Quality Assurance Criteria such as detailed inspection and documentation were required for the Feed Water system.

3. After several years of serious problems in the design, fabrication, installation, and inspection of piping and associated components in the Turbine

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Building at the Harris Plant, CP&L faced the prospect of performing extensive and costly rework including necessary inspections and documentation as required by the NRC's QA regulations. Instead of seeing that the job was done right-- by the same standards that even CP&L had committed to honor-- CP&L sought to circumvent quality standards and thereby "alleviate all concerns related to the additional inspection and documentation requirements for the supports in the Turbine Building," by attempting to "de-classify" the Feed Water and Main Steam systems inside the Turbine Building.

4. In my opinion such attempts by CP&L Engineers Ed Willett and Alex Fuller to "de-classify" these important systems simply represent efforts to cover-up their own shoddy work; as did their responses to my attempt to document and correct the Feed Water Pump misalignment.

5. Even the limited documentation available to me now supports my position. For Example, I attach as Exhibit 1 Work Directive No. 2836, dated 7/13/83, for Turbine Building Feed Water pipe support T-3-261-1-FW-H-11, which reflects this "de-classification" of the Feed Water hangers in the Turbine Building: " . . this hanger is considered non-seismic and will require no CI or QC involvement or acceptance." This Work Directive cites generic Field Change Request FCR-H-1145, "Reclassification of MS & FW Supports in the Turbine Building." Revisions 0 and 1 reflect site approval by Ed Willett on 1/14/83 and Alex Fuller on 5/13/83, respectively. They are Exhibits 2 and 3, attached.

These generic FCRs rely on a November 12, 1982, Ebasco letter, EB-C-14332,

Exhibit 4, for authority to "reclassify the mainsteam and feedwater pipe supports and the main steam piping, in the turbine building. These items are to be non-seismic, in accordance with letter EB-C-14332." No mention is made of the Feed Water piping lines themselves in the PCRs, since the Kbasco letter expressly excepts the Feed Water piping from de-classification: "Please note that the generic PCR should also cover the feedwater supports in the Turbine Building. From the inspection and documentation aspects, these supports can be handled as B31.1, non-seismic, however, the lines will not be declassified to non-seismic." Thus, even long after my observation of the improper fit-up of the Feed Water pipe-to-pump connection, the Feed Water piping line remained Seismic Class I- requiring Quality Assurance program compliance. The Bergen- Patterson drawing for pipe-support FW-H-11, Exhibit 5, dated 5/27/83, continues to reflect "Safety Class 4/ Seismic Class I" for this hanger.

6. I continue to question the validity of CP&L's attempts to solve their problems of shoddy work at the Harris Plant through such "de-classification" of quality requirements. The nonconformance I observed was a violation of such quality requirements applicable at the time they were violated. My concerns should have been investigated and documented properly at the time by my management. They were not. Neither "de-classification" of defective work nor discarding employee complaints will make the Shearon Harris Nuclear Power Plant safe. I only hope that this NRC Licensing Board will.

SWORN to and subscribed before me

Chan Van Vo

this ____ day of November, 1984.

NOTARY PUBLIC

MEMORANDUM TO CASE FILE

TYPE ACTION

- ☒ RECORD OF CONVERSATION
☒ CASE REVIEW / STATUS
☐ OTHER

PARTICIPANTS

B. Uryc
J. Cankford
J. VORSE

FILE NO.

84-0143

DATE

NOV 29 1984

TIME

CONFIDENTIALITY REQUESTED YES NO

SUMMARY

Vorse advised that VO transcript is still under review by ROBINSON. We also advised VORSE of incident w/ ANG at CP&L during followup and VORSE agreed ANG handled matter properly when he refused to supply documents to licensee.

PAGE 1 OF 1

PREPARED BY

BRUNO URYC

DATE

NOV 29 1984

ACTION REQUIRED

REVIEWED BY

DATE

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Bruno U-4C

UNITED STATES OF AMERICA
ADMINISTRATIVE PROCEEDINGS
UNITED STATES DEPARTMENT OF LABOR

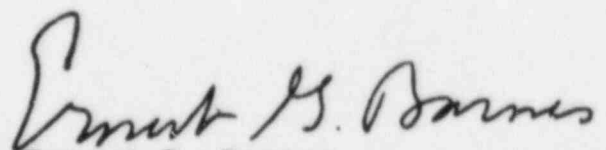
In the Matter of)	Case No. 85-ERA-3
CHAN VAN VO,			
	Complainant,		
	v.		
CAROLINA POWER & LIGHT COMPANY,	Respondent.		

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ORDER DISMISSING COMPLAINT

Complainant, duly represented by counsel, and having reached a satisfactory resolution of the matter with Respondent Company, has requested that this matter be dismissed with prejudice. Accordingly,

IT IS ORDERED that the complaint herein be, and it hereby is DISMISSED WITH PREJUDICE.


Ernest G. Barnes
Administrative Law Judge

Date: November 15, 1984

CERTIFICATE OF SERVICE

I hereby certify that I caused the attached document to be mailed this date to the following persons or organizations at the addresses given below:

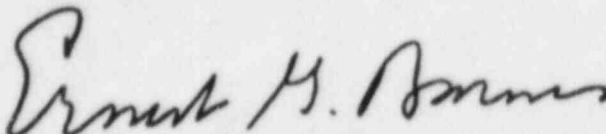
Robert Guild
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Mr. James C. Stewart
Area Director
Wage and Hour Division
United States Department of Labor
P.O. Box 27486
Raleigh, North Carolina 27611



Ernest G. Barnes
Administrative Law Judge

Dated: November 15, 1984