



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

PDR-DLB

AUG 4 1985

Mr. Robert T. Simmons
12 Patricia Court
Ridgewood, NJ 07450

IN RESPONSE REFER
TO FOIA-85-516

Dear Mr. Simmons:

This is in response to your letter of July 17, 1985, in which you requested, pursuant to the Freedom of Information Act (FOIA), biographical data on Resident Inspector Herbert Livermore, and Systematic Assessment of Licensee Performance (SALP) reports for ten plants.

The NRC has already made the SALP reports identified on the enclosed Appendix A available for public inspection and copying at the NRC Public Document Room (PDR), 1717 H Street, NW, Washington, DC 20555. Appendix B lists two additional SALP reports which are being placed in the PDR in response to your request. These reports will be filed in PDR folder FOIA-85-516 under your name. We are enclosing a copy of a notice that provides charges and procedures for obtaining copies of records from the PDR.

The NRC regional office in Arlington, Texas, informs us that there is no SALP report for the South Texas Project for the 1979-80 period.

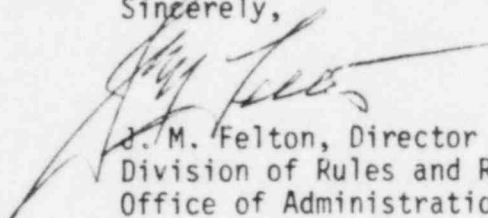
A document that provides biographical data on Mr. Livermore, is enclosed. Portions of this document are being withheld from disclosure pursuant to Exemption (6) of the FOIA (5 U.S.C. 552(b)(6)) and 10 CFR 9.5(a)(6) of the Commission's regulations. The information withheld consists of Mr. Livermore's birth date, home telephone and address, salary in private industry, and other personal information, release of which would constitute a clearly unwarranted invasion of personal privacy.

Pursuant to 10 CFR 9.9 of the NRC's regulations, it has been determined that the information withheld is exempt from production or disclosure and that its production or disclosure is contrary to the public interest. The persons responsible for the denial of the deleted sections are the undersigned and Mr. James G. Keppler, Administrator of NRC's Region III.

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PDR FOIA
SIMMONS85-516 PDR

This denial may be appealed to the NRC's Executive Director for Operations within 30 days from the receipt of this letter. As provided in 10 CFR 9.11, any such appeal must be in writing, addressed to the Executive Director for Operations, U.S. Nuclear Regulatory Commission, Washington, DC 20555, and should clearly state on the envelope and in the letter that it is an "Appeal from an Initial FOIA Decision."

Sincerely,



J. M. Felton, Director
Division of Rules and Records
Office of Administration

APPENDIX ADOCUMENTS PREVIOUSLY PLACED IN PDR

<u>Plant</u>	<u>Docket No.</u>	<u>Date</u>	<u>PDR Accession No.</u>	<u>Pages</u>
1. Shoreham	50-322	1979-80 1980-81	8106020366 8208060283	9 40
2. Nine Mile Point 2	50-410	1979-80 1980-81	8106090382 8303140439	8 40
3. Washington Public Supply System Unit 2	50-397	1981-82	8212170091	21
4. Grand Gulf	50-416 } 50-417 }	1979-80 1980-81	8102170579 8212090414	8 19
5. River Bend	50-458	1979-80	8011200098	11
6. Surry North Anna	50-280 } 50-281 } 50-338 } 50-339 }	1980-81	8212090285	35
7. Limerick	50-352	1980-81	8112140236	3
8. Waterford	50-382	1979-80	8101070257	10

APPENDIX B

RELEASED DOCUMENTS

1. 08/22/80 Letter, R. H. Engelken, NRC, to R. L. Ferguson, WPPSS, enclosing evaluation of licensee performance at Washington Nuclear Project No. 2 for period April 1979 through July 1980 (14 pages)
2. 12/31/80 Memo, O'Reilly to Chairman, SALP Review Group, re SALP Board results for Virginia Electric and Power Co. (North Anna and Surry Plants)



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION V

1990 N. CALIFORNIA BOULEVARD
SUITE 202, WALNUT CREEK PLAZA
WALNUT CREEK, CALIFORNIA 94596

AUG 22 1980

Haynes/Dadds

Docket No. 50-397

Washington Public Power Supply System
P. O. Box 968
Richland, Washington 99352

Attention: Mr. R. L. Ferguson
Managing Director

Gentlemen:

Subject: NRC Regional Evaluation of Licensee Performance
Washington Nuclear Project No. 2

This refers to the meeting held at the NRC Region V Office in Walnut Creek, California on August 12, 1980, between Mr. R. H. Engelken and members of the Region V staff with Mr. R. L. Ferguson and other Washington Public Power Supply System senior management personnel. The purpose of this meeting was to discuss the results of NRC's regional evaluation of licensee performance regarding activities authorized by NRC Construction Permit No. CPPR-93. A summary report of the meeting and supporting data are enclosed.

Items discussed during the meeting included a summary of the findings and evaluation of the NRC regional review board regarding compliance with NRC requirements at the Washington Nuclear Project No. 2 during the period April 1979 through April 1980, specific areas of concern and matters requiring corrective actions by WPPSS and a summary of the findings and evaluation of an investigation into the activities of your 215 contractor (WBG). The areas of concern and required corrective actions are delineated in the NRC Office of Inspection and Enforcement Director's letter to you of June 17, 1980.

In accordance with Section 2.790 of the NRC's "Rules of Practice", Part 2 Title 10, Code of Federal Regulations, a copy of this letter and its enclosures will be placed in the Nuclear Regulatory Commission's Document Room.

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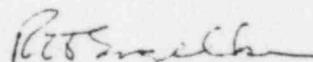
Mr. R. L. Ferguson

-2-

AUG 22 1980

Should you have any questions concerning the enclosed evaluation and supporting data, we will be glad to discuss them with you.

Sincerely,



R. H. Engelken
Director

Enclosure:

IE Inspection Report No. 60-397/80-11

cc w/enclosures:

Senator T. Bottiger, Washington State Senate

Senator S. Gould, Washington State Senate

N. D. Lewis, EFSEC, Washington State

cc w/o enclosures:

D. L. Renberger, WPPSS

F. D. McElwee, WPPSS

W. C. Bibb, WPPSS

M. E. Witherspoon, WPPSS

U. S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION V

Report No. 50-397/80-11

Docket No. 50-397

License No. CPPR-93

Licensee: Washington Public Power Supply System

P. O. Box 968

Richland, Washington 99352

Facility Name: Washington Nuclear Project Unit 2 (WNP-2)

Meeting at: NRC Region V, San Francisco

Meeting conducted: August 12, 1980

Report By:

J. Spencer
for A. D. Toth, Resident Inspector WNP-2

8/21/80

Date Signed

Approved By:

R. H. Engelken
R. H. Engelken, Director

8/21/80

Date Signed

Summary:

Management Meeting August 12, 1980 (Report No. 50-397/80-11)

This was a special corporate management meeting to present to R. L. Ferguson, newly appointed Managing Director of the Supply System effective August 1, 1980, the results of NRC Region V evaluation of licensee performance for the period of April 1979 through July 1980. This review encompassed data presented in a similar meeting of May 20, 1980 and included review of subsequent inspection and investigation findings. Specific areas of NRC concern were discussed, as well as planned NRC actions regarding WPPSS restart of work which had been subject of NRC immediate action letters.

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DETAILS

1. Meeting Attendees

Washington Public Power Supply System

R. L. Ferguson, Managing Director
D. L. Renberger, Assistant Director, Technology
F. D. McElwee, Assistant Director, Projects
M. W. Hultgren, Manager of Projects
W. C. Bibb, Project Manager - WNP-2
M. E. Witherspoon, Division Manager, Quality Assurance

Nuclear Regulatory Commission - Region V

R. H. Engelken, Director
G. S. Spencer, Chief, Reactor Construction & Engineering Support Branch
R. C. Haynes, Chief, Reactor Projects Section, Construction
R. T. Dodds, Chief, Engineering Support Section, Construction
J. L. Crews, Chief, Reactor Operations Branch
D. M. Sternberg, Chief, Reactor Projects Section 1, Operations
A. D. Toth, Resident Reactor Inspector, WNP-2
T. W. Bishop, Resident Reactor Inspector, WNP-3/5
J. H. Hanchett, Public Affairs

Washington State Senate

Senator T. Bottiger, Chairman, Senate Energy and Utilities Committee
Senator S. Gould, Ranking Republican, Senate Energy and Utilities Committee
C. Eschels, Senior Research Analyst, Senate Energy and Utilities Committee

Energy Facility Site Evaluation Council

F. Hahn, Chairman, Monitoring Committee
G. Hansen, Staff Engineer

Bonneville Power Administration

J. R. Lewis, Project Engineer - WNP-2

2. NRC Position Statement

The NRC Regional Director described the Inspection and Enforcement mission and the potential impact on the issuance of a WNP-2 operating licensee. He noted that over the past two years NRC has repeatedly expressed concerns

over the ineffectiveness in the implementation of the WPPSS quality assurance program and inadequate control of contractor activities. He stated that the November 21, 1979 NRC Stop Work letter and the June 17, 1980 Notice of Violation, Civil Penalty, and 10 CFR 50.54(f) letters set forth the NRC position on these matters and the required corrective actions. The Director emphasized the need for strong management attention by WPPSS to these problems.

3. General Areas of NRC Concern

The following items were identified as specific and general problem areas which appear to exist for the WNP-2 project:

- a) Contractors with significant quality deficiencies had been allowed to perform quality class 1 work.
- b) Excessive time required to correct identified deficiencies.
- c) Large inspection backlogs for completed work.
- d) Poor site records control.
- e) Multitude of site contractors having independent quality assurance programs.
- f) Assignment of quality assurance staff with lead responsibility for contractor work compliance.
- g) Overly complex and over-committed procedural requirements.
- h) Inadequate indoctrination of personnel.
- i) Inadequate pre-planning and preparation.
- j) Inadequate feedback of problems to first-line personnel.

4. Enforcement History

The Region V staff discussed the enforcement history and apparent trends for WNP-2. Inspection finding versus manhour statistics indicated that it has recently taken less effort for NRC inspectors to identify problem areas on this project as compared to other projects in Region V. (See Attachments 1 and 2). A review of NRC inspection findings show uncorrected or repeat items and cases where procedures which were to control work were not in place prior to start of the work. (See Attachment 3). A review of events associated with the sacrificial shield wall and pipe-whip restraint problems since 1975 show that several opportunities were presented wherein WPPSS could have identified and corrected the significant quality assurance program deficiencies which were recently found to exist. (See Attachment 4).

5. Recent Investigation/Inspection Results

In early 1980, a Washington State Senate Investigating Committee interviewed various WNP-2 project personnel regarding project cost matters. Various statements obtained appeared to relate to construction quality matters and these were verbally conveyed to NRC headquarters personnel. No written allegations were submitted by WNP-2 personnel in this regard. The NRC considered first 38, then an additional 7 items as areas of concern. A Region V inspector-investigator-supervisor team then spent 780 man-hours on-site, and in the vicinity of the site, conducting further interviews and inspecting hardware and records. The NRC Director of the Office of Inspector and Auditor attended interviews on several days to assess the potential for any criminal activity. The period of interest for the investigation into work/records was 1978 to present, relating to on-site mechanical contractor activities. A total of 12 apparent items of noncompliance, 7 unresolved items and 21 open items requiring followup action were identified by the investigation team (see attachment). The results of the investigation reinforced the earlier conclusions described in the NRC June 17, 1980 10 CFR 50.54(f) letter, regarding need for management action.

6. Work Restart Program

The Region V staff discussed the events and requirements for restart of site construction activities, the need for adequate procedures, preparation of personnel, and completion of other prerequisites was noted. Relative to NRC imposed constraints, the following actions are anticipated:

- 1) Region V November 21, 1979 Immediate Action Letter regarding sacrificial shield wall: WPPSS plans to submit data to NRR to supplement the WPPSS/NRC August 6, 1980 meeting presentation. Following the NRR review, Region V will issue a letter acknowledging the satisfactory completion of this condition (i.e. comprehensive corrective action plan) stipulated in the IAL.
- 2) NRC July 13, 1980 letter regarding contract #215: The NRC Senior Resident Inspector at WNP-2 will examine the results of the WPPSS re-evaluation of detailed work methods and associated corrective action plans for contract #215. Following this review, Region V will issue a letter lifting the work restart constraint.
- 3) NRC June 17, 1980 letter regarding 10 CFR 50.54(f): The NRC resident inspector and Regional Office based inspectors will routinely review the implementation of the commitments described in the above letter. The results of these reviews will be documented in monthly inspection reports. The resident inspector at WNP-1/4 was transferred to the WNP-2 specifically to provide close followup of these activities. The inspector is not, however, part of the WPPSS review/approval chain.

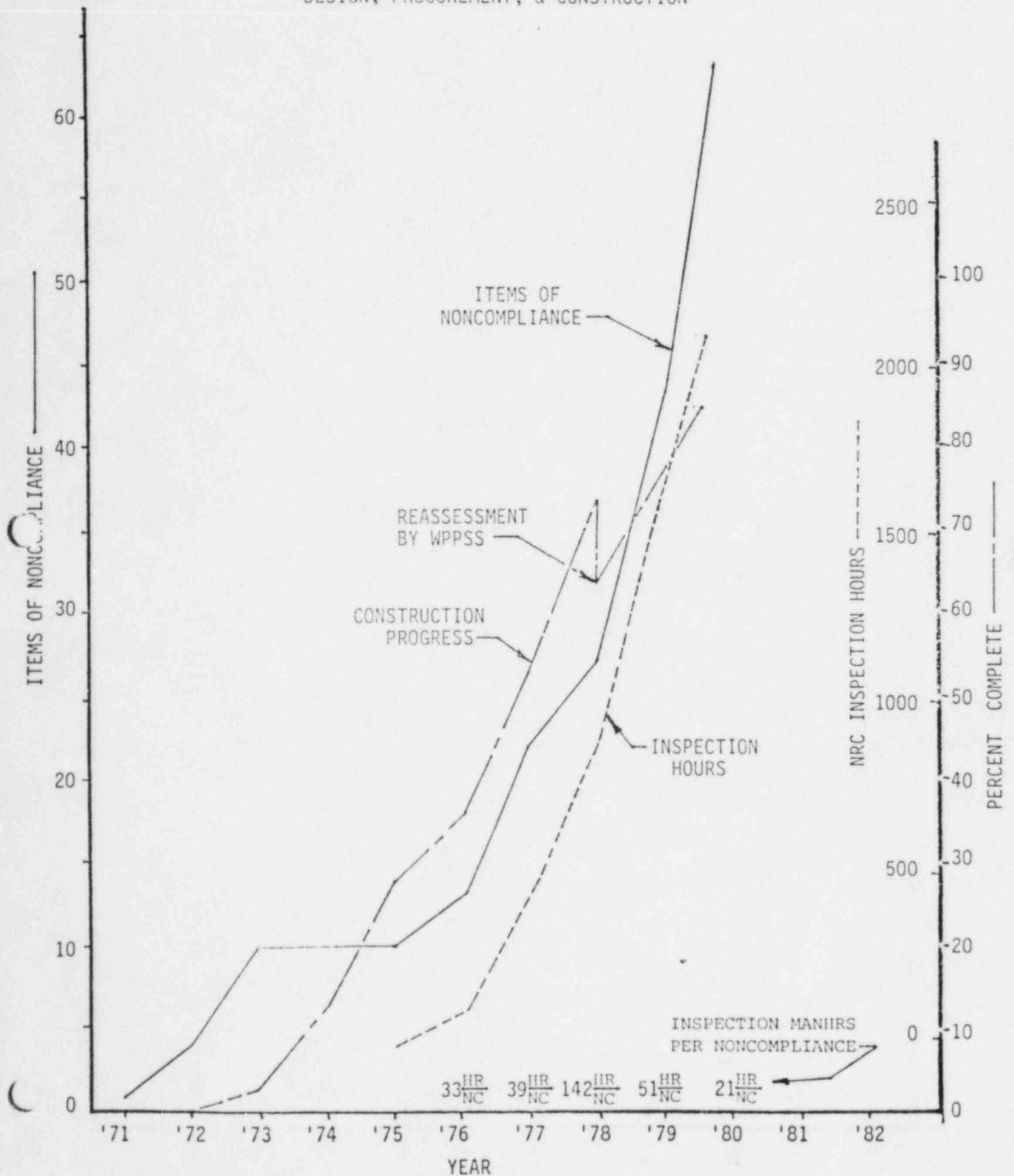
With regard to WPPSS plans submitted in response to the NRC letter, the NRC staff cautioned that the described reviews be more than paper reviews, and include meaningful hardware inspections.

7. Conclusion

The NRC Regional Director expressed the view that WPPSS can recover from the problems discussed at the meeting, although close management attention will be required. The WPPSS Managing Director noted that he will be personally involved in this matter and will keep the Region V office informed. He indicated that WPPSS will particularly re-evaluate how WPPSS does business with its contractors.

WNP-2 ENFORCEMENT HISTORY

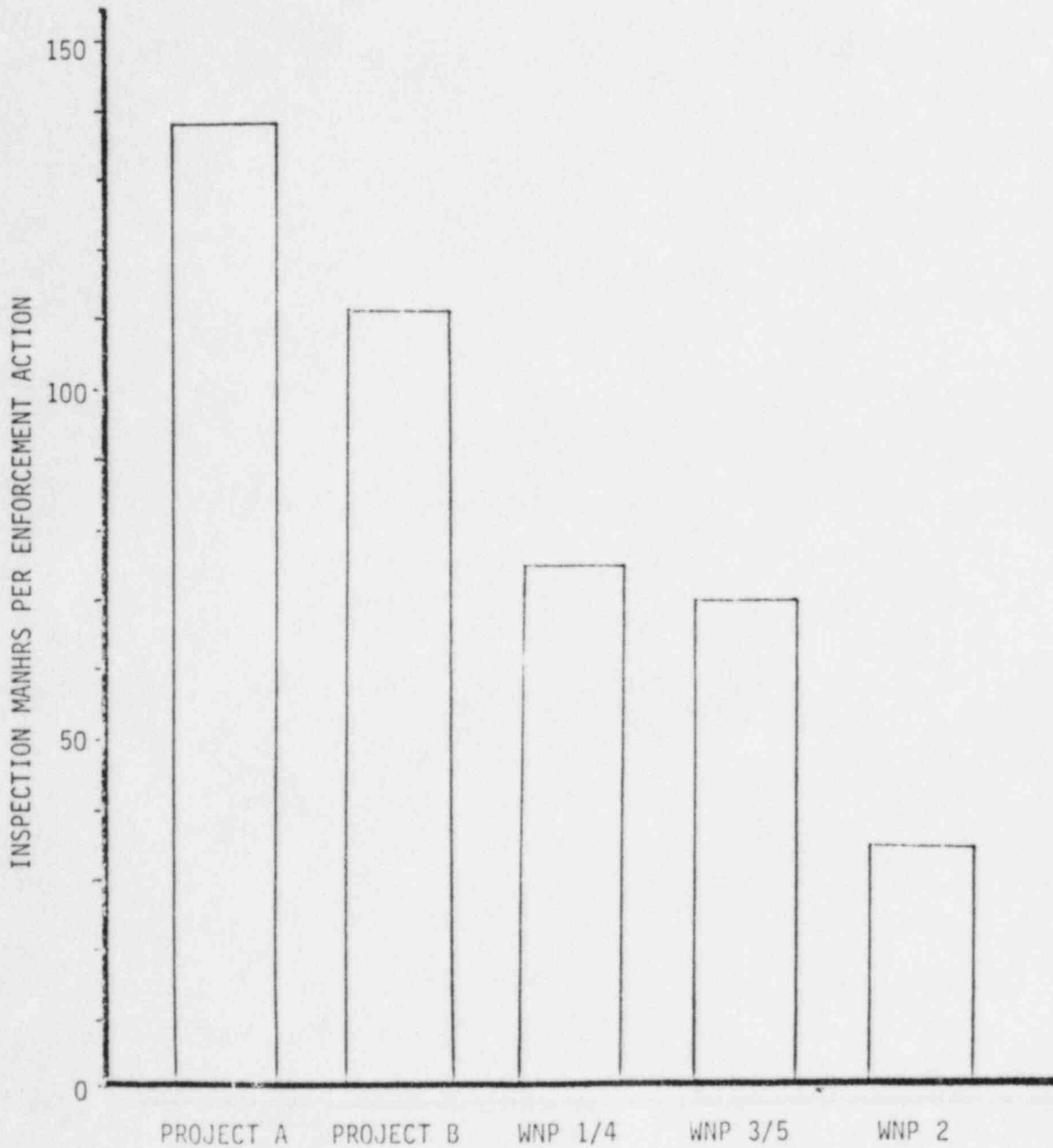
DESIGN, PROCUREMENT, & CONSTRUCTION



NRC RV ENFORCEMENT ACTIVITY

DESIGN, PROCUREMENT, & CONSTRUCTION

(AVG. OF 18 MOS. PRECEDING 7/80)



WNP-2 ENFORCEMENT HISTORY

<u>ITEM</u>	<u>TYPE*</u>	<u>DESCRIPTION</u>	<u>REPEAT</u>
1	I	Failure to maintain cleanliness JCI	X
2	I	Failure to monitor weld preheat	
3	D	Failure to maintain inspection status	
4	D	Failure to properly code electrical cables	
5	I	Failure to properly install battery racks	
6	D	Failure to properly identify circuit breakers	
7	I	Failure to qualify PWHT procedure	
8	I	Failure to provide procedure for PWHT	
9	D	Failure to maintain records of PWHT	
10	I	Failure to PWHT per ASME Code	
11	I	Failure to maintain system cleanliness F/L	X
12	I	Failure to maintain system cleanliness JCI	X
13	I	Failure to provide class I-E equipment for RPS	
14	V	Failure to properly weld SSW	
15	I	Failure to maintain system cleanliness F/L & JCI	X
16	I	Failure to provide SSW UT procedure	
17	I	Failure to provide PWR UT procedure	
18	I	Failure to provide SSW Heat straightening procedure	
19	I	Failure to provide PWR heat straightening procedure	
20	I	Failure to provide SSW weld sequence procedure	

WNP-2 Enforcement History

- 2 -

<u>ITEM</u>	<u>TYPE*</u>	<u>DESCRIPTION</u>	<u>REPEAT</u>
21	I	Insufficient SSW records identification of Inspection personnel	
22	I	Insufficient SSW records-inconsistent information	
23	I	Insufficient PWR records - identification of inspection personnel	
24	I	Insufficient PWR records - inconsistent NDE reports	
25	I	Insufficient PWR records - incorrect inspection identification	
26	I	Insufficient PWR records - incorrect inspection identification	
27	I	Failure to qualify PWR inspection personnel	
28	I	Failure to qualify SSW inspection personnel	
29	I	Failure to control weld filler material	
30	I	Failure to repair per AWS	
31	I	Failure to properly UT PWRs	
32	I	Failure to properly inspect pipe supports	X
33	D	Failure to document weld inspection	

*V = VIOLATION
 I = INFRACTION
 D = DEFICIENCY

WNP 2 SACRIFICIAL SHIELD WALL/PIPE WHIP RESTRAINT CHRONOLOGY

1975 CONTRACTOR GIVEN APPROVAL TO START FABRICATION OF SHIELD WALL

7/76 NRC INSPECTION OF SHIELD WALL SITE ERECTION ACTIVITIES
NONCOMPLIANCE- LACK OF QUALITY PROCEDURES

7/76 STOP WORK ISSUED, SITE ACTIVITIES AUDITED BY CONTRACTOR/BURNS & ROE

8/76 CONTRACTORS SHOP ACTIVITIES AUDITED BY BURNS & ROE/WPPSS

6/78 CONTRACTOR CERTIFIES SACRIFICIAL SHIELD WALL COMPLETE

10/78 VOIDS DETECTED IN SHIELD WALL BY 215 CONTRACTOR

11/78 215 CONTRACTOR IDENTIFIES NUMEROUS DEFECTS, ASKS WPPSS TO
RE-EVALUATE THE SHIELD WALL

2/79 WPPSS NOTIFIES NRC OF MAJOR WELD DEFECTS FOUND IN BRACKETS
FABRICATED BY THE SHIELD WALL CONTRACTOR

3/79 BURNS & ROE ESTABLISHES PLAN TO ASSESS SHIELD WALL ADEQUACY

6/79 NRC RECEIVES ALLEGATIONS REGARDING SHIELD WALL AND REPAIRS,
INSPECTORS IDENTIFY GAP BETWEEN RINGS, QUESTION RECORDS

7/79 WPPSS COMMITMENT TO NRC TO REVIEW ALL SHIELD WALL QUALITY RECORDS

7/79 215 CONTRACTOR INITIATES QUALITY REVIEW OF SHIELD WALL CONTRACTOR

10/79 WPPSS REPORTS TO NRC THAT SHIELD WALL IS NOT PROPERLY WELDED TOGETHER

10/79 NRC REVIEW OF BURNS & ROE EVALUATION ACTIVITY REVEALS THE
EVALUATION IS BASED ON INCOMPLETE DATA (TYPICAL VS ACTUAL DEFECTS)

11/79 WPPSS NOTIFIES NRC OF RECORDS IRREGULARITIES IN PIPE WHIP RESTRAINT
RECORD PACKAGES (SAME CONTRACTOR AS SHIELD WALL)

11/79 NRC ISSUES IMMEDIATE ACTION LETTERS, WORK STOP ON SACRIFICIAL
SHIELD WALL AND PIPE WHIP RESTRAINTS

11/79- NRC INVESTIGATION OF SHIELD WALL/PIPE WHIP RESTRAINT CONTRACTOR'S
2/80 PROGRAM AND RECORDS, 18 ITEMS OF NONCOMPLIANCE

WNP-2
REPORT NO. 50-397/80-08
NONCOMPLIANCE/UNRESOLVED/OPEN ITEMS LIST

<u>TRACK NO.</u>	<u>PARAGRAPH</u>	<u>ITEM</u>
01	3.a	Infraction - Organizational freedom of QA/QC
02	3.b(1)	Deficiency - Survey document of vendor not maintained
03	3.c	Unresolved - Acceptance criteria for receiving inspection of hangers
04	3.d	Open - Licensee to examine program for documenting inspection findings
05	3.e	Open - Work continued on a support FDR-385 after issuance of a NCR
06	3.g	Unresolved - Welds being cut out rather than repaired to preclude B/R review
07	4.b	Deficiency - Failure to document inspection findings relative to incorrect amperage settings for MT probes
08	4.c(1)	Open - WP-57 does not address the removal of temporary weld attachments
09	4.c(1)	Infraction - Failure to maintain records for temporary weld attachments
10	4.c(4)	Open - Form NF-286 contains note that temporary welding records will not necessarily form a part of permanent documentation
11	5.a(1)(a)	Infraction - Piping support clearances in excess of requirements
12	5.2(2)	Open - Inspectors to be instructed to request engineers review of fillet welds on curvature of pipe
13	5.b	Open - Licensee to consider reportability of welding problems related to Pybus steel
14	5.c	Unresolved - Control and documentation of arc strikes on structural steel
15	5.d	Open - Licensee to consider generic problem related to lack of penetration in pipe from Associated Pipe
16	5.e	Infraction - Failure to use filler metal specified in procedure
17	3.5(1)(b)	Unresolved - Dispositioning of questionable filler metal and corrective action
18	3.d(1)(b)	Open - Disposition of pipe in quarantine, heat numbers N12476 and N12477
19	5.e	Open - Inconsistency in purging procedure for socket welds
20	5.f	Open - Question of reportability of problems related to the anchoring of support base plates
21	6.a & b	Open - Handling of pipe minimum wall thickness problems

<u>TRACK NO.</u>	<u>PARAGRAPH</u>	<u>ITEM</u>
22	6.b(3)	Deficiency - Incorrect acceptance standards used to evaluate results of LP examinations
23	7.a	Open - WBG QAP-7 does not require owner approval of contractor procedures and revisions
24	7.b(6)	Open - Establishment of controls to coordinate hanger material identification
25	7.c	Open - Control of certain heats of pipe in quarantine as identified in surveillance report No. M-246
26	7.c	Open - Heat number is missing from pipe spool RHR-2018-1
27	7.g	Open - Pipe with an apparent legitimate heat number has been installed, but has the word "scrap" painted on it
28	7.h	Unresolved - Difference between stores requisition records and laydown inventory records
29	8.a, b & c	Infraction - Calculations were not provided to support deletion or redesign of support welds
30	8.a	Open - Page 1 of Engineering Quality Audit is missing from documentation package for support RCC-3
31	8.b	Open - Inspection/control of oversized support steel fillet welds
32	9.a	Open - Followup on cleanliness of pipe being installed
33	9.b	Open - Review of system flashing procedures during preoperational inspections since flushing not planned prior to hydrostatic tests
34	10.c	Unresolved - Calibration of torque wrenches and for tightening of Velan valves in pump house (NCR-5163)
35	10.g	Unresolved - Question relative to the satisfactory removal of a ladder that had been tack welded inside MS-528-7.10 pipe spool
36	11.a & 11.k(b)	Deficiency - Failure to provide a procedure and/or checklist for document review of work packages
37	11.a	Deficiency - Failure of QA Manager to review records of rework that was performed subsequent to the document package acceptance review
38	11.a	Infraction - Failure to perform weld inspection as required by procedure
39	11.a, h & k(6)	Open - General review of licensee's action to assure final document reviews are properly accomplished, including commitment to the NRC on document review
40	7.a	Infraction - Failure to comply with procedure revision requirements