

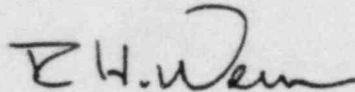
JAN 18 1985

Note to: (TRT Group Leaders

Subject: Useful Depositions

Attached is a list of useful depositions compiled by OELD. For certain allegation reviews we should have read (and referenced in our SSERs) these depositions. Most of these depositions were made available to the TRT when we were onsite.

Look over the list (arranged by topic), if you think we have missed something, contact C. Haughney (x27297) who will obtain a copy from OELD.


R. H. Wessman

cc: w/o encl.
C. Haughney

FOIA-85-59

D/393

8601170307 851213
PDR FOIA
GARDE85-59 PDR

Document Name:
SUMMARY OF RECORD - CPSES

Requestor's ID:
MATILDAL

Author's Name:
GSM/RGB/GAB/Lucas

Document Comments:
Intimidation Alleg., and Alleg. Derived fm Intimidation Pro.

EPI

NRC Intimidation in an Interview of an Allegor

[REDACTED]
alleged that NRC Region IV inspectors intimidated [REDACTED] in an interview.

The evidence consists of:

Deposition of [REDACTED] (July 25, 1984), [REDACTED]
a tape recording of the alleged intimidating interview
a written transcript of that interview.

7c

E/I

Intimidation of QC Inspector in Auxiliary Building

[REDACTED] alleged that [REDACTED] observed [REDACTED] a general foreman for cable tray supports, yelling and shouting obscenities at a QC inspector for "red-tagging" too many cable tray supports.

7c

The evidence on this incident consists of:

Deposition of [REDACTED] (July 12, 1984), [REDACTED]

Intimidation of Welding QC Inspector in North Valve Room

[REDACTED] at CPSES, alleged that [REDACTED] saw a QC inspector identify improper welding in the North Valve Room. According to [REDACTED] the QC inspector left, saying he was going to stop it, but later returned and did not stop the improper welding.

The evidence on this issue consists of:

Deposition of [REDACTED] (July 12, 1984), [REDACTED]

OI Report [REDACTED] (14 August 1984)

OI Report [REDACTED] (13 March 1984)

OI Report [REDACTED] at 23 (7 March 1984)

7c

Stanford Incident

Alleged intimidation regarding voided NCR written by [REDACTED]

[REDACTED] wrote NCR on QC inspector [REDACTED] indicating he had falsified dates, thus enabling craft to bypass QC hold points. NCR was voided. Applicants assert that dates were changed only to correct error.

The witnesses and their testimony which deal with the alleged incident are as follows:

Deposition of [REDACTED] August 1, 1984 [REDACTED] and August 2, 1984 [REDACTED]

Deposition of [REDACTED] July 28, 1984 [REDACTED]

Deposition of [REDACTED] July 24, 1984 [REDACTED]

Deposition of [REDACTED] July 25, 1984 [REDACTED]

Deposition of [REDACTED] July 25, 1984 [REDACTED]

Deposition of [REDACTED] July 25, 1984 [REDACTED]

Deposition of [REDACTED] July 10, 1984 [REDACTED]

Testimony of [REDACTED]

(9/20/84)

Testimony of [REDACTED]

(10/1/84)

Testimony of [REDACTED]

(11/26/84)

Prefiled Testimony of [REDACTED] August 15, 1984

Prefiled Testimony of [REDACTED] August 16, 1984

Prefiled Testimony of [REDACTED] August 16, 1984

Prefiled Testimony of [REDACTED] August 16, 1984

Prefiled Testimony of [REDACTED] and [REDACTED] August 15, 1984

Prefiled Testimony of [REDACTED] August 15, 1984 [REDACTED]

See OI Report [REDACTED] (12 September 1984)

Intimidation of Protective Coating QC Inspectors

[REDACTED] at CPSES,
alleged that he was aware of attempts by [REDACTED] supervisor,
to intimidate protective coatings QC inspectors.

The evidence consists of the Department of Labor Transcript of [REDACTED]
[REDACTED] Section 210 complaint, [REDACTED]

[REDACTED]. See especially:

Testimony of [REDACTED] DOL [REDACTED]

Testimony of [REDACTED] DOL [REDACTED]

Testimony of [REDACTED] DOL [REDACTED]

Testimony of [REDACTED] DOL [REDACTED]

Testimony of [REDACTED] DOL [REDACTED]

Testimony of [REDACTED] DOL [REDACTED]

Testimony of [REDACTED] DOL [REDACTED]

OI Report [REDACTED] (24 August 1983)

OI Report [REDACTED] (3 November 1983)

OI Report [REDACTED] (26 July 1983)

OI Report [REDACTED] at 19, 21 (7 March 1984)

OI Report [REDACTED] (10 February 1983)

OI Report [REDACTED] (18 October 1983)

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7c

?

Termination

Allegation that QC inspector was terminated because of [redacted] complaints concerning QC.

[redacted] termination paper states [redacted] was terminated for insubordination. [redacted] filed a complaint with the Department of Labor claiming [redacted] was fired for criticizing the QC program, and one [redacted] in particular.

The parties have stipulated that [redacted] testimony is contained in the record of the DOL hearing, [redacted] (February 13 and 14, 1984).

During the evidentiary depositions in this proceeding, Applicants presented further testimony on circumstance surrounding [redacted] termination:

Deposition of [redacted]; July 10, 1984 ([redacted])

Deposition of [redacted] July 11, 1984 ([redacted])

Deposition of [redacted] July 9, 1984 ([redacted])

Testimony was also given by Applicants during the hearing sessions of September 11 and 18, 1984:

Testimony of [redacted] (9/11/84)

Testimony of [redacted] (9/18/84)

By Order dated November 30, 1984, the ALJ in the DOL proceeding dismissed [redacted] complaint [redacted] "Recommended Decision and Order").

OI Report [redacted] (27 July 1983)

OI Report [redacted] (10 February 1983)

OI Report [redacted] (24 August 1983)

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E & I

T-Shirt Incident

Intervenor alleged that electrical QC inspectors wearing T-Shirts were intimidated by management.

Certain electrical QC inspectors were wearing T-shirts referring to "nitpickers." They were subsequently sequestered by management and their desks searched. (There is a question of their prior involvement with "destructive testing" prior to the incident.) Some of those involved were later transferred or terminated. Applicants assert management might have overreacted, but the actions taken were not intimidation.

7c

Evidentiary depositions:

Deposition of [REDACTED] July 16, 1984; [REDACTED]
Deposition of [REDACTED] July 17, 1984; [REDACTED]
Deposition of [REDACTED] July 31, 1984; [REDACTED]
Deposition of [REDACTED] July 10, 1984
Deposition of [REDACTED]; July 10, 1984;
Deposition of [REDACTED] July 11, 1984;
Deposition of [REDACTED] July 11, 1984;
Deposition of [REDACTED] July 10, 1984
Deposition of [REDACTED] July 17, 1984

Hearing Testimony:

Testimony of [REDACTED] (9/10/84)
Testimony of [REDACTED] (9/10/84)
Testimony of [REDACTED] (9/11/84)
Testimony of [REDACTED] (9/13/84)
Testimony of [REDACTED] (9/13/84)
Testimony of [REDACTED] (9/14/84); [REDACTED]
(9/18/84)

Testimony of [REDACTED] (9/20/84)

Testimony of [REDACTED] (9/20/84)

Testimony of [REDACTED] (10/1/84)

OI Report [REDACTED] (24 August 1983)

Liner Plate Traveler Incident (A)

[REDACTED] alleged that [REDACTED] was intimidated into signing off on QC weld hold points on liner plate travelers.

[REDACTED] allegedly was ordered to sign off QC weld hold points for fitup and cleanliness on travelers for the stainless steel liner plates of the Unit 2 reactor cavity. [REDACTED] signature was to be verified by inspection chits purportedly done by other inspectors for these hold points a few years previously. [REDACTED] did not agree that the chits matched the hold points [REDACTED] was to sign. [REDACTED] alleges [REDACTED] was compelled to sign under threat of losing the upcoming weekend off. Applicants assert that the procedure [REDACTED] was to follow was proper and therefore [REDACTED] was not intimidated.

[Note: This allegation has resulted in another separate issue at the hearings following the evidentiary depositions, the adequacy of the QC weld documentation for the liner plates. See Deposition of [REDACTED] August 16, 1984 [REDACTED].] 7c

Evidentiary depositions:

Deposition of [REDACTED] August 1, 1984
[REDACTED] and August 2, 1984 [REDACTED] 7D

Deposition of [REDACTED] July 31, 1984

Deposition of [REDACTED] July 24, 1984

Deposition of [REDACTED] July 25, 1984

Deposition of [REDACTED] July 25, 1984

OI Report [REDACTED] (12 September 1984)

Liner Plate Traveler Incident (B)

Intervenors alleged that there was a QC breakdown in the documentation of the liner plate welds.

As a result of documentation which was supplied by Applicants in the course of testimony on "Liner plate traveler incident (A)," Intervenors raised the issue of an overall QC breakdown in the QC process as applied to the liner plate welds. Applicants responded with testimony ostensibly refuting each of the alleged deficiencies. [Note: The subject of the adequacy of QC inspections and their documentation of the liner plate welds has been looked into by the TRT. The TRT's conclusion is not yet known.]

Evidentiary record:

The background and context for this issue is in the material listed in "Liner plate incident (A)."

Deposition of [REDACTED]; August 16, 1984 [REDACTED]
"CASE's Evidence of a Quality Control Breakdown" dated
September 27, 1984

Prefiled Testimony of [REDACTED] October 3, 1984
[REDACTED]

"CASE's Further Evidence of a Quality control Breakdown in the
Construction, Installation and Inspection of the Stainless Steel
Liner Plate" dated November 15, 1984

Testimony of [REDACTED] (9/12/84); [REDACTED]
(9/13/84); [REDACTED] (9/18/84); [REDACTED] (9/19/84);
[REDACTED] (11/26/84); [REDACTED] (11/27/84)

Voiding of NCR on Polar Crane

[REDACTED] at CPSES, alleged that an NCR which [REDACTED] wrote regarding a hole in the polar crane rail was improperly voided and the hold tag improperly removed.

The evidence on this allegation consists of:

Deposition of [REDACTED] (July 13, 1984) [REDACTED]

Deposition of [REDACTED] (submitted as prefiled written testimony) [REDACTED]

OI Report [REDACTED] (9 July 1984)

OI Report [REDACTED] at 26 (7 march 1984)

7c

Weave Welding on a Pipe Support in the Auxiliary Building

[redacted] at CPSES, alleges that [redacted] wrote an NCR identifying unacceptable weave welds on a pipe support in the Auxiliary Building. According to [redacted] was intimidated by craftworkers and by [redacted] into improperly accepting the welds on the NCR.

The evidence on this allegation consists of:

Deposition of [redacted] (July 13, 1984), [redacted]

Deposition of [redacted] (submitted as prefiled written testimony)

In addition, substantial testimony on this allegation was received by all parties in the technical portion of this proceeding. See generally:

March 19-20, 1984 hearing session transcripts, [redacted]

April 24, 1984 hearing session transcript, [redacted]

OI Report [redacted] (9 July 1984)

OI Report [redacted] at 26 (7 March 1984)

7c

Welding of Diesel Generator Skids

[REDACTED] at CPSES, alleges that [REDACTED] was harassed and intimidated by [REDACTED] when he assigned [REDACTED] to conduct inspections of welds on the diesel generator skids for CPSES, even after [REDACTED] protested that [REDACTED] was unqualified to conduct these inspections.

The evidence on this issue consists of:

Deposition of [REDACTED] (July 13, 1984), [REDACTED]

Deposition of [REDACTED] (submitted as prefiled written testimony)

See OI Report [REDACTED] (9 July 1984); [REDACTED] (7/19/84)

7c

Weld Symbols on Doors

[REDACTED] at CPSES, contends that [REDACTED] was told by [REDACTED] to improperly accept doors which had not been properly welded in accordance with the design drawings for the doors.

The evidence on this allegation consists of:

Deposition of [REDACTED] (July 13, 1984), [REDACTED]

7c

Deposition of [REDACTED] (submitted as prefiled written testimony)

?

Harassment Due to Relocation of an Office

[REDACTED] CPSELs, claims that [REDACTED] was harassed by Applicants after giving testimony in the July 1982 hearing session in this proceeding. The harassment consisted of moving [REDACTED] office four times over a two-day period, and of finally placing [REDACTED] in a shack that [REDACTED] claimed was unsturdy, dirty, unairconditioned for three days, and smaller than [REDACTED] original office.

The evidence on this incident consists of:

Deposition of [REDACTED] (July 13, 1984), [REDACTED]

Deposition of [REDACTED] (July 20, 1984)

Deposition of [REDACTED] (July 20, 1984)

Deposition of [REDACTED] (submitted as prefiled written testimony)

See OI Reports [REDACTED] (3/7/84); [REDACTED] (7/9/84)

7c

Harassing Telegram Accusing [REDACTED] of Improperly Copying Documents

[REDACTED] at CPSES, alleges that a letter sent by Applicants' counsel to [REDACTED] (as well as the other parties) accused [REDACTED] of stealing and lying, and threatened [REDACTED] termination if caught. In actuality, a telegram, not a letter, was sent to [REDACTED] and the telegram did not accuse [REDACTED] of lying and stealing. Rather the telegram suggests that [REDACTED] was improperly encouraging [REDACTED] to copy and remove documents from on-site.

The evidence and relevant material consists of:

Deposition of [REDACTED] (July 13, 1984), [REDACTED]

Telegram (attached to CASE's Motion for Protective Order)
(August 12, 1982)

Deposition of C. [REDACTED] (submitted
as prefiled written testimony)

7c

Incidents Intended to Have [REDACTED] Leave CPSES

[REDACTED] at CPSES, related a series of incidents which [REDACTED] believes were intended to force [REDACTED] to leave [REDACTED] employment at the CPSES site. These related incidents are: (1) meetings with Ronald Tolson and [REDACTED] where [REDACTED] claims they pressed [REDACTED] about [REDACTED] health and [REDACTED] (2) [REDACTED] request that [REDACTED] bring a doctor's note in each week to certify [REDACTED] capability to work; and (3) an incident where [REDACTED] was refused admittance to a bus carrying workers to CPSES, which [REDACTED] blames upon articles in the Circuitbreaker (a company newsletter distributed at the site).

The evidence consists of:

Deposition of [REDACTED] (July 13, 1984) [REDACTED]

Affidavit of [REDACTED] (August 1, 1984)

Deposition of [REDACTED] (submitted as prefiled written testimony)

Testimony of [REDACTED]

Deposition of [REDACTED] (August 2, 1984), [REDACTED]

See OI Reports [REDACTED] (3/7/84); [REDACTED] (7/9/84)

7c

██████████ testified as a Board witness on September 18-19, 1984. ██████████ was employed as a ██████████ at CPSES from January 1983 to December 1983. Because ██████████ was employed by ██████████

██████████ Considering ██████████ background includes an undergraduate degree in Chemistry, a graduate degree in Polymer Science, and previous engineering and inspection experience at several nuclear plants, ██████████ was one of the most qualified QC inspectors ever employed at CPSES.

██████████ recounted several incidents relating to harassment and intimidation. The first incident involved ██████████ job interview with ██████████. According to ██████████, as a result of meeting with ██████████ had a strong impression that notwithstanding ██████████ expertise, ██████████ did not want ██████████ to question QC procedures or engineering judgments. The second incident involved a concern ██████████ had regarding ██████████ review and reviews of design change authorizations (DCAs). According to ██████████ raised these questions to ██████████, who was unable to answer ██████████ questions. ██████████ instead took ██████████ to ██████████ office to discuss the matter. At that meeting, according to ██████████ indicated to ██████████ that ██████████ was not to concern ██████████ self with engineering matters but instead was to concentrate all of ██████████ efforts on performing inspections. ██████████ was later called to discuss the same matter with ██████████. As a result of these encounters, ██████████ testified that ██████████ was reluctant to write an NCR unless it was a "garden-variety" type NCR.

The third instance of harassment alleged by ██████████ involved members of the painting crew. According to ██████████ was ordered by ██████████ a paint foreman, and other painters to perform inspections. ██████████ stated that if ██████████ did not accede readily to their demands, a complaint would be lodged with ██████████ who invariably sided with craft.

The fourth incident involved an NCR written by ██████████ reporting an indeterminate substance on a coated surface which ██████████ had inspected. ██████████ testified that after writing the NCR ██████████ told ██████████ to not to report for work the next day but instead report directly to ██████████ on ██████████ next scheduled work day. During this meeting, ██████████ questioned ██████████ judgment and suggested that ██████████ was paranoid.

The final incident recounted by ██████████ involved the alleged use by painters of cigarette filters in the spray painting equipment. In ██████████ view, painters inserted cigarette filters in the cheater valves of spray guns to pass the air acceptability inspection because the filters made the air supply appear cleaner than it was; the painters then would remove the filters after the test. Before ██████████ could report this alleged non-conforming condition, however, a complaint was lodged with ██████████ supervisors. A meeting was held between ██████████

[redacted], the paint foreman, and [redacted] According to [redacted] [redacted] sided with the painters because [redacted] did not have personal knowledge that the filters were removed by painters subsequent to the air acceptability test and because the use of cigarette filters was not a violation of any procedural requirement. Consequently, [redacted] did not write an NCR. It should be noted that the Technical Review Team has confirmed [redacted] allegation.

Citations to the testimony by [redacted] and Applicants on the matters described above are as follows:

A. [redacted] initial meeting with [redacted]

(9/19/84) [redacted]
(12/3/84) [redacted]
(11/28/84) [redacted]
(11/28/84) [redacted]
(11/28/84) [redacted]

B. [redacted] Meeting with Tolson and [redacted] Concerning [redacted] Review and Design Change Authorization

(9/18/84) [redacted]
(9/19/84) [redacted]
(11/28/84) [redacted]
(11/28/84) [redacted]
(11/28/84) [redacted] (NCR re
reactor core cavity)
(9/19/84) [redacted] (NRC re reactor core activity)
(11/28/84) [redacted] (NCR re reactor core
activity)
[redacted] (12/18/84)

C. Harassment by Painters

(9/18/84) [redacted]
(9/18/84) [redacted]
(11/28/84) [redacted]
(12/3/84) [redacted]
(12/3/84) [redacted]

E. Detergent on Coated Surface NCR

(9/18/84) [redacted]
(11/28/84) [redacted]
(11/28/84) [redacted]
(12/3/84) [redacted]

F. Cigarette Filer Incident

[REDACTED] (9/18/84) [REDACTED]
[REDACTED] (11/28/84) [REDACTED] (12/3/84)

7c

OI Report [REDACTED] (26 July 1983)

Witnesses: [REDACTED] Trip Report

In July 1983, [REDACTED]

[REDACTED] visited CPSES to evaluate Applicants' coatings program

[REDACTED] spent three days at CPSES observing the coatings program and speaking with site personnel. After [REDACTED] returned to [REDACTED]

[REDACTED] wrote a report to [REDACTED] detailing [REDACTED] observations and conclusions regarding Applicants' coatings program. In [REDACTED] report [REDACTED] expressed the view that the coatings program was plagued by many problems including lack of painter qualification, poor traceability and storage of materials, quality control reporting to craft, and TUGCO management's lack of commitment to quality. [REDACTED] report concluded with two explosive observations: (i) that parallels could be drawn between the CPSES and Zimmer plants; and (ii) that OBC bid for a "rework" contract with TUGCO because little, if any, of the coatings work already in place was salvageable.

The [REDACTED] trip report somehow found its way into the hands of the NRC, the Intervenor, and the Dallas/Ft. Worth news media. The public disclosure of the [REDACTED] trip report set off a chain of events culminating in the recanting by [REDACTED] of the concerns and conclusions expressed in [REDACTED]. The reasons behind [REDACTED] turnabout is the subject of this aspect of the intimidation proceeding. The testimony relevant to this inquiry may be found at:

(10/1/84)

(10/2/84)

(11/19/84)

(11/20/84)

(11/20/84)

(11/20/84)

(12/3/84)

(12/4/84)

(12/5/84)

(12/17/84) (Evid. Dep. of [REDACTED])

(1/3/85) (Evid. Dep. of [REDACTED])

(1/5/85) (Evid. Dep. of [REDACTED])

(1/7/85)

(1/8/85)

7c

Termination of [REDACTED]

[REDACTED] alleged that [REDACTED] was terminated for reporting a gouge in a pipe to a QC inspector.

[REDACTED] allegedly discovered a gouge in a pipe near where [REDACTED] was welding on a pipe hanger. [REDACTED] foreman supposedly wanted to cover it up and witnessed [REDACTED] showing the gouge to QC inspector [REDACTED]. Shortly thereafter [REDACTED] was terminated. Applicants assert [REDACTED] was terminated for absenteeism.

Evidentiary depositions:

Deposition of [REDACTED] July 13, 1984

Deposition of [REDACTED] August 2, 1984

Deposition of [REDACTED] July 9, 1984

Deposition of [REDACTED] July 19, 1984

Deposition of [REDACTED] July 9, 1984

7c

Valve disk incident

[redacted] alleged that when [redacted] brought a discrepancy in valve disk numbers to the attention of [redacted] supervisor, he told [redacted] it didn't matter, which made [redacted] "discouraged."

[redacted] was shown a traveler by [redacted] with a valve disk number which did not match the disk number of the Data Report. When [redacted] brought this to the attention of [redacted] supervisor, [redacted] he told [redacted] it didn't matter and would cost too much money to check. Applicants assert that it really didn't matter and deny that cost would be a factor if the discrepancy were real.

7c, 7d

Evidentiary depositions:

Deposition of [redacted] July 28, 1984 [redacted]

Deposition of [redacted] July 10, 1984 [redacted]

Testimony:

Prefiled Testimony of [redacted] (8/16/84)

Prefiled Testimony of [redacted] (8/16/84 and 8/18/84)

Pressure on N-5 Viewers

[REDACTED] alleged that undue pressure was applied to QA/QC document reviewers.

[REDACTED] alleged that [REDACTED] supervisor [REDACTED] pressured/intimidated the N-5 document reviewers by: (1) demanding 40 iso's a week; (2) threatening the use of job shoppers; (3) commenting on company loyalty.

Evidentiary depositions:

Deposition of [REDACTED] July 17, 1984 ([REDACTED]); July 31, 1984 [REDACTED]

Testimony:

Prefiled testimony of [REDACTED] (8/16 & 8/18/84)

Prefiled testimony of [REDACTED] (8/16/84)

Testimony of [REDACTED] (9/13/84)

7D

QES Review Sheet Incident

[REDACTED] alleged that [REDACTED] supervisor ordered a reviewer to sign off a QES review sheet without doing the review.

[REDACTED] alleged that [REDACTED] ordered a reviewer, [REDACTED] to sign off on a QES cover sheet when the original was missing without having [REDACTED] do the review. Applicants assert that this is an acceptable practice.

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Evidentiary depositions:

Deposition of [REDACTED] July 17, 1984 ([REDACTED]; July 31, 1984 [REDACTED])

Testimony:

Prefiled testimony of [REDACTED] (8/18/84)

Prefiled testimony of [REDACTED] (8/16/84)

Testimony of [REDACTED] (9/13/84)

Reduction of Force (ROF) Incident

[REDACTED] alleged that there is something wrong with the way employees are selected for a ROF.

[REDACTED] alleged that the more qualified people were ROF'd. Applicants response is that there is a comprehensive, mainly objective method of selection.

7D

Evidentiary depositions:

Deposition of [REDACTED] July 17, 1984 [REDACTED] July 31, 1984 [REDACTED]

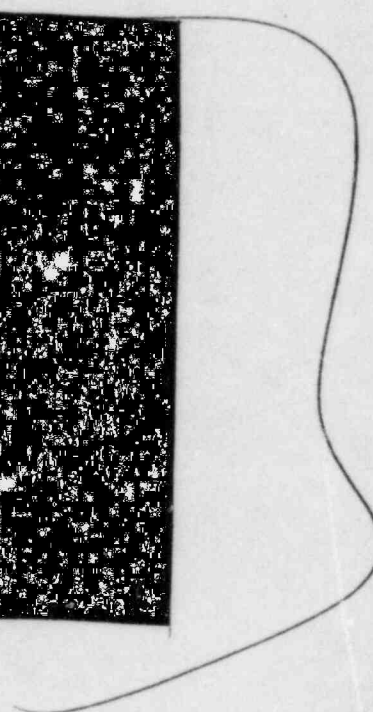
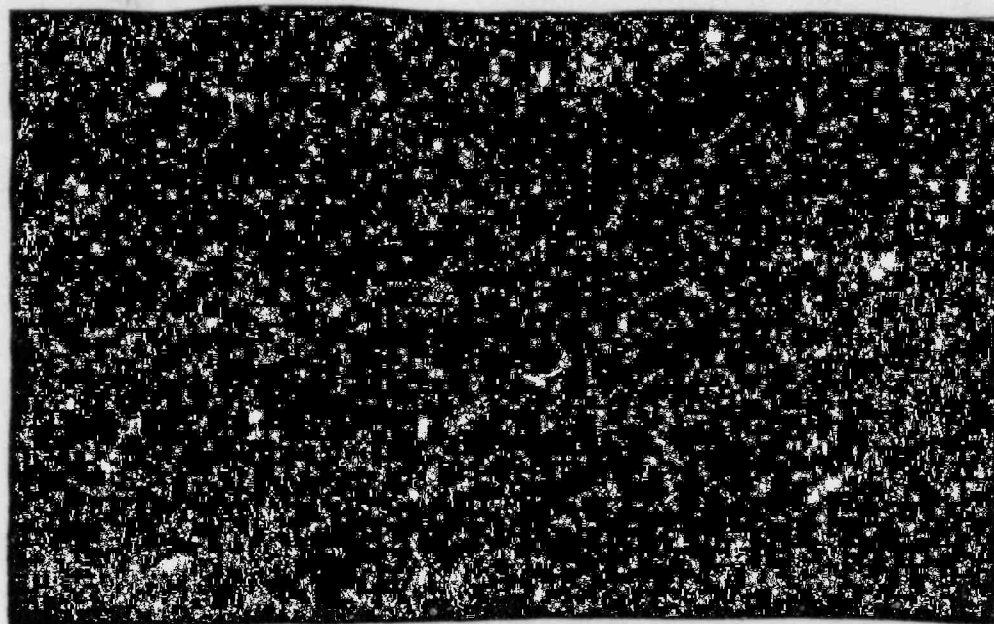
Testimony:

Prefiled testimony of [REDACTED] (8/16/84)

Testimony of [REDACTED] (9/13/84)

C.

D.



E&I 1C

Witness F



A.

B.

Allegation Task No.

AQE-34

D/394

Allegation Category: Electrical and Instrumentation 5, Electrical Nonconformance Report (NCR) Activities

Allegation Number: AQE-1, AQE-2, AQE-3, AQE-4, AQE-5, AQE-25, AQE-33, AQE-34, AQE-35, AQE-37, AQE-38, AQE-40, AQE-41, AQE-42, AQE-45, AQE-47, AQE-48, AE-24, and parts of AE-22, AE-27, AQE-12, AQE-36 and AE-50.

Characterization: It is alleged that the validity of the generation and disposition of electrical nonconformance reports (NCRs) was suspect.

Assessment of Safety Significance: The implied safety significance of these allegations is that the quality of the electrical installation could be indeterminate.

These allegations pertain to various concerns involving the NCR program, and include:

- ° Prevalent "use-as-is" dispositions of NCRs (AQE-33, AQE-47, AQE-34, AQE-35, Parts of AE-27 and AQE-36).

The TRT interviewed a TUEC electrical engineer and a lead quality engineer (QE) about the "use-as-is" disposition of electrical NCRs (AQE-33, AQE-47, AQE-34, AQE-35 and parts of AE-27, and AQE-36). The TRT determined that for an NCR to receive a "use-as-is" disposition, an independent verification inspection by an electrical engineer had to be made for each reported item of nonconformance. Based on that inspection, and on an evaluation with regard to procedures, specifications, drawings (including applicable codes and standards), and other related documentation, a "use-as-is" disposition could be applied. Final approval of such a disposition required two QE signatures. The TRT also reviewed the 75 NCRs to determine if there were any with the disposition "use-as-is" with the explanation "not addressed in ES-100," as alleged. The TUEC engineer also indicated that should an NCR be received with this type of disposition, it would be "kicked back" and would require more justification.

The TRT determined that if the nonconformance indeed was not addressed in ES-100, then a document, such as a procedure or other specification, that did address this nonconformance item would be required to be referenced in the NCR. Of the 75 NCRs examined, the TRT could identify no "use-as-is" dispositions which deviated from applicable design requirements, except for those identified in Electrical and Instrumentation Category 1, "Electrical Cable Terminations," and Electrical and Instrumentation Category 2, "Electrical Cable Tray and Conduit Installation," regarding NCRs identifying bent terminal lugs in motor control centers (part of AQE-36), and reporting two loose conduit elbow fittings (part of AE-27), respectively. These TRT findings were discussed with the allegers, one of whom disagreed with the TRT findings as related to AQE-34 and AQE-35 and provided additional information. The TRT is currently evaluating this new information and will report its findings in a supplement to this SSER.

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J51

AQE-34 (CONTINUED)

Conclusions and Staff Positions: Based on the reviews of the pertinent documentation, examination of NCRs, and the information obtained from the interviews, the TRT concludes that adequate procedures, controls, and process checks exist for the generation and disposition of reported items of nonperformance as related to the concerns raised by the above allegations. The TRT also concludes that of the allegations identified at the outset of this section, only a few specific instances were found which raised questions concerning the adequacy of safety-related items. These are discussed above and are discussed further in other sections of the report.

SSER-7
J53

The results of this evaluation will be further assessed as part of the overall programmatic review of all NCRs addressed under QA/QC Category 5, "Nonconformance Reports," and under QA/QC Category 6, "QC Inspection." Therefore, the final acceptability of this evaluation will be predicated on the satisfactory result of the overall programmatic review on these subjects. Any adjustments to these conclusions will be reported in a supplement to this SSER. The results of the TRT review of new information concerning allegations AOE-34, AOE-35 and AOE-37 will also be reported in a supplement to this SSER.

Action Required: None.

REFERENCE DOCUMENTS:

1. NCR No. EB4-00673, 3/6/84 - Attached
2. Insp. Rpt No. EC-1-0029591, 3/5/84 - Attached
3. Testimony: Alleged Rick Bralson, Oct 30, 1984
Granbury, Tx - Pages 15-25 - Attached
4. B & R Craft Procedure CI-CFM 6.12
Rev 3, 6/7/83 - Attached
5. B & R Craft Procedure CI-CFM 6.12,
Rev 4, 10/24/84
— Attached
6. Bisco Procedure SP-107, Rev 2, 6/82
— Attached.

AGE-34 (Continued)

REVIEWERS COMMENTS:

To Date the ^{floor electrical penetration} Bisco sleeve installations, coming out of cable tray T13 GACE90 at Elevation 832, Room 226, Axx bldg, have not been reinspected (e.g. the Bisco foam seal fire retardant material has not been removed). The attached UCR 84-00673 dispositions ~~these~~ installations to be "used as is", therefore TUEC does not plan to reinspect these installations.

The ~~alleged~~, in testimony, maintains that the visual inspection performed was inadequate in that only three to four inches down the sleeves could be observed. The alleged maintained that the threaded rod used to remove the Bisco foam seal was bent and was down beyond and excess of a foot, making observation of the cable damage obscure. The alleged also maintains that the crafts activity to remove the fire retardant material was not covered by procedure. The alleged was concerned

that this activity had generic implications.

Procedures which govern the removal of the foam seal materials are general and also by TUEC: by B & R for governing contract personnel and also by TUEC: A Penetration Subcontractor,

Brand Industrial Services Co (Bisco) of Park Ridge, Illinois.

Insert 1A → The authorization for either the contract or Bisco personnel to perform this activity requires an Interim Removal Notice (IRN) in which the applicable procedures are referenced.

The TRT concludes that adequate procedural controls (CI CPM 6.12, Rev 2 and SP-107 Rev 2, 1982) did exist for the disposition of this reported item of nonconformance as related to the alleged concern.

The TRT concludes that no evidence exists to substantiate that cables pulled through these penetration sleeves have not been damaged, other than a questionable visual examination. Damage cables within penetration sleeves may have potential generic implications.

1/31/85

AQE-34 (continued)

Insert A

When the entire Bisco seal is required to be removed, the B&R craft procedure no. CE CPM 6.12 is used. When only partial removal of the seal material is required, the Bisco procedure no. SP-107 is in force and implementation of the work is performed by BISCO personnel.

ACTIONS REQUIRED

TUEC shall ^{remove the Biscor seals and} reinspect the above cited penetration sleeves for damaged cables, by other than visual means in the installed position. In the event acceptability of electrical cables (within the installed penetration sleeve area) cannot be demonstrated, TUEC shall reinspect a sample size of other ^{for cable damage} electrical penetration sleeves, which use ^{the} Biscor seal material and which has been removed ~~for~~ ^{for} ~~cable damage~~. Unacceptable damaged cables shall be replaced.

ATT. JIM DYER

UNIT	STRUCTURE/SYSTEM	ITEM/COMPONENT	TAG/ID NUMBER	LOCATION OR ELEVATION	RIR NO
1	AUX / N/A	CLASS IIE CABLES	TRACE NUMBERS 5026 5025	3A/FA Room 326	832 N/A

NONCONFORMING CONDITION

CRAFT WAS FOUND USING 1/2" ALL-THREAD ROD, TO PUNCH OUT PENETRATION SEAL, AND AS A PRY-BAR TO LOOSEN CABLES IN CONDUIT FLOOR SLEEVES. ENOUGH FORCE WAS APPLIED TO ALL-THREAD DURING PROCESS OF LOOSENING CABLES TO CAUSE ROD TO BEND. WHEN ALL-THREAD WAS REMOVED FROM SLEEVE SCOTCH 33 TAPE WHICH WAS PLACED OVER ALL-THREAD HAD TORN AWAY FROM ROD EXPOSING THREADS TO JACKET OF CABLES. CABLES MAY HAVE SUBSTAINED AN INDETERMINATE AMOUNT OF DAMAGE DUE TO THIS PROCESS, WHICH WOULD NOT BE VISIBLE DURING THE REINSPECTION FOR PENETRATION RELEASE. CABLES IN QUESTION ARE IN THE TWO LEFT FLOOR SLEEVES COMING OUT OF TRY T136ACEPO.

TWO HOLD TAGS APPLIED.

REFERENCE DOCUMENT: ES-100 REV 2 PARA 2.7

REPORTED BY:

Leon Routh

DATE:

2/27/84

QE REVIEW/APPROVAL:

Sandy M. Hooton

DATE:

2/23/84

ACTION ADDRESSEE

R. Hooton

DEPARTMENT

AWT TASK FORCE

DISPOSITION:

REWORK _____ REPAIR _____ USE AS IS XX SCRAP _____

A visual inspection was made on the cables in the conduits in question. While minor, superficial damages to the cable jackets was observed, there were not any signs of excessive stress or any major unacceptable damage to the cables. The cables in question may be used as is.

QA RECORD

RTN.	QA REVIEW
L	CH3-6-84
FILE NO.	15.1
SUBFILE NO.	E-84-03673

ARMS
INDEXED

ENG. REVIEW/ APPROVAL

WIV

DATE:

P. Dayalu

INFORMATION

DATE:

3/5/84

QE REVIEW APPROVAL:

N. D. P. Pendergast

DATE:

3/15/84

DISPOSITION VERIFICATION & CLOSURE:

N. D. P. Pendergast

DATE:

3/16/84

COMMENTS:

COPY

PPRV

REPORTING PERSONNEL

ACTION ADDRESSEE

QE

INSPECTION REPORT

EC-1-002959

[illegible]

BROWN & ROOT, INC. CPSZS	PROCEDURE NUMBER	REVISION	EFFECTIVE DATE	PAGE
	CI-CPM 6.12	4	10/24/84	1 of 4
TITLE: AREA RELEASE FOR PENETRATION SEALS - AND REMOVAL OF THE SEISMIC GAP FLASHING	ORIGINATOR	<i>[Signature]</i>	10-18-84	Date
	REVIEWED BY:	<i>U.B. Jones</i> CPPE	10/18/84	Date
		<i>[Signature]</i> B&R QA	10/19/84	Date
		<i>[Signature]</i> TUGCO QA	10/22/84	Date
	APPROVED BY:	<i>[Signature]</i> CONSTRUCTION PROJECT MGR	10/23/84	Date

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1.0 REFERENCES

- 2.0 GENERAL
- 2.1 PURPOSE
- 2.2 SCOPE
- 2.3 RESPONSIBILITY
- 2.4 DEFINITIONS

3.0 PROCEDURE

4.0 RELEASE FOR HIGH DENSITY SEALS

1.0 REFERENCES

- 1.1 TUSI Contract CP-0707
- 1.2 Room Schedule for Penetration Seals or Room Turnover Schedule
- 1.3 Item Removal Notice Procedure CP-CPM 6.10.

2.0 GENERAL

2.1 PURPOSE

This procedure establishes the methods and controls for notification to the various jobsite organizations for release of rooms and/or areas for penetration sealing, and control of the seismic gap (air space between buildings.)

FOR OFFICE AND
ENGINEERING USE ONLY



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2.2 SCOPE

This procedure shall apply to the notification of the scheduled date for installation of penetration seals on a room by room basis in accordance with Reference 1.2 and release of the room and/or area for the penetration seal contractor to perform actual sealing activities in accordance with Reference 1.1.

2.3 RESPONSIBILITY

The Building Department shall be responsible for installing, removing and maintaining temporary seals or temporary flashings as discussed in paragraph 3.1, and for installing, removing and maintaining temporary and permanent flashings as discussed in paragraph 5.0.

The Area Management Group is responsible for scheduling and notification of release of rooms and/or areas to the Procurement Management Group.

The Penetration Seal Contractor is responsible for actual sealing of the penetrations in accordance with Reference 1.1.

The Production Control Group is responsible for the statusing of completed penetration seals.

The Procurement Management Group is responsible for the coordination and overall management and/or administration of the penetration seal contractor.

2.4 DEFINITIONS

2.4.1 Area Management Group

The organization which schedules, releases rooms and/or areas for penetration seal work.

2.4.2 Penetration Seal Contractor

The organization which performs the actual installation of penetration seals in accordance with Reference 1.1.

2.4.3 Production Control Group

The organization which statuses the completion of penetration seal work.



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2.4.4 Procurement Management Group

The organization which coordinates and performs the overall management and/or administration of the penetration seal contractor.

2.4.5 Seismic Gap Flashing

Seismic gap flashing is barrier material, such as sheet metal, which seals the space between buildings and prevents the entrance of foreign objects. Such flashings are used on the roof, in doorways, and any other openings not sealed with Bisco seals. Bisco seals are not considered as seismic gap flashings.

3.0 PROCEDURE

- 3.1 Penetrations between buildings shall be kept in a state which will prevent items from being placed through them which could become trapped between the walls. These penetrations shall be sealed with the permanent seals, or protected by temporary seals or flashings which could not become dislodged and be trapped between the buildings' walls.
- 3.2 The Area Management Group shall notify the appropriate Engineering and craft personnel two (2) weeks prior to the scheduled date for penetration seal work within rooms and/or areas. Copies of the approved contractor's field survey drawings shall be forwarded to the craft and the discipline engineers.
- 3.3 Each discipline superintendent shall perform all outstanding work within the rooms and/or areas for penetrations requiring seals. Each discipline superintendent (Piping, Electrical, Instrumentation, Millwright) shall determine that all penetrating items are installed in accordance with approved design documents and/or design changes.
- 3.4 Each discipline Engineer shall determine that the design for penetrating items is complete, and notify the Area Management Group of any incomplete designs that could affect the penetration sealing work.
- 3.5 The Area Management Group coordinates work for resolution of any unsatisfactory items and requests final QC inspection (excluding electrical) prior to sealing.
- 3.6 The Area Management Group shall identify areas ready for penetration seals to the Procurement Management Group.
- 3.7 The Procurement Management Group shall direct the penetration seal contractor to proceed with actual seal installation in accordance with Reference 1.1.



BROWN & ROOT, INC. CPSZS JOB 35-1195	FIGURE NUMBER	REVISION	DATE	PAGE
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3.8 When B&R removes a penetration seal or any other seal or flashings between buildings, an IRN shall be prepared prior to the removal and presented to TUGCO QC for signature. QC's signature shall be authorization to remove the item. The Building Department shall provide temporary protective measures for an unsealed penetration which will be left unattended by QC. The IRN shall be forwarded to Area Management.

When Bisco removes a penetration seal, Bisco QC shall perform the necessary inspections in accordance with Bisco procedures.

3.9 The seals may be removed by the craft only if the entire seal is required to be removed. If only a partial removal is necessary, Bisco shall be contacted to make the partial removal.

4.0 RELEASE FOR HIGH DENSITY SEALS

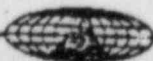
4.1 The release of penetrations which receive high density seals shall be as described above. Additionally, the Release for Penetration Sealing (Attachment 1) form shall be completed prior to the placement of the seals.

The form shall be initiated by PMG and submitted to Area Management for routing to the organizations responsible for signing the form. After completion of the form, Area Management shall return the completed form to PMG who may then authorize the sealing of the penetration.

5.0 REMOVAL OF SEISMIC GAP FLASHING

A traveler (see example in Attachment 2) shall be prepared and presented to Tugco QC for signature before removal of any portion of the seismic gap flashing; QC's signature on the traveler shall be authorization to remove the flashing. Care shall be taken not to allow any debris to fall into the gap, and the gap shall not be left unattended unless protected by a temporary cover. If debris which cannot be retrieved and removed does fall into the gap, notify QC so that the proper Engineering evaluation can be performed and documented.

Prior to reinstallation of the permanent flashing, Tugco QC shall perform and document an inspection in accordance with QC procedures.



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ATTACHMENT 1
RELEASE FOR HIGH DENSITY PENETRATION SEALS

RELEASE FOR HIGH DENSITY PENETRATION SEALS

Room No./Area _____

BISCO Drawing No.(s) _____

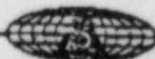
Penetration No.(s) _____

The penetration(s) identified above have been evaluated and are released for sealing. (Any exceptions should be listed by Penetration No. in space provided.)

	Signature	Date	Exceptions
Mechanical Engineering			
Electrical Engineering			
Instrumentation Engineering			
General Mechanical Superintendent			
General Civil Superintendent			
General Electrical Superintendent			
Instrumentation Superintendent			
Brown & Root QA (ASME) To be released in accordance with QI-QAP-11.1-26			
TURCO QA (Non-ASME)			
TURCO QA Electrical			
TURCO QA Instrumentation			

After signature, route to the next discipline.

Upon completion of this release, forward to the Procurement Management Group.



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ATTACHMENT 2

CONSTRUCTION OPERATION TRAVELER 35-1195					
1	2	3	4	5	6
TRAVELER NO.	EQUIPMENT NO.	UNIT NO.	QUANTITY	PAGE	OF
ACTIVITY DESCRIPTION			REFERENCE DRAWINGS		
SPEC/PROC/ENR. INSTR.		LOCATION	SYSTEM		
PREPARED BY		DATE	DEPT.		
REVIEWED BY		DATE			
ART REVIEW		DATE			
OP	DEPT.	OPERATIONS	COMET	ENG	DATE
1	Const	Obtain Building Manager's approval before beginning work Building Manager _____ Date _____			
2	Const QC	Notify QC of the impending seal/flashings removal			
3	Const QC(V)	Remove the seal/flashings			
4	Const QC(V)	Witness work activities while penetration/gap are open. If debris enters the seismic gap, notify the Quality Engineering Lead for further action.			
5	Const QC (V)	Install/remove temporary protective measures as required DATE _____ _____ _____ _____			
6	Const QC(V)	Seal the penetration/seismic gap			

TYPICAL



1 these other areas, but at least in the electrical area we
2 think it's okay at this point. Any other suggestions on
3 that that you could offer us, or can we go on to another?

4 [REDACTED] Let's go on.

5 MR. WESSMAN: Okay. Let's go on. Do you want to do
6 34? This is AQE34 and this was the one concerning cable
7 damage on the Bisco seals. Before he starts, let me point
8 out that if you think we're missing the target, you've got
9 to tell us because we're doing our best. If you have a
10 specific example and you think we're wrong, you're our best
11 help at this point. We've done our best; we've looked as
12 hard as we can; we've taken what we think are reasonable
13 samples; we've obviously talked to folks out there, both
14 management folks and craft folks, and we've done our best
15 to see what we can find.

16 Okay. Go ahead with 34.

AQE-34

17 MR. JOHNSON: With respect to the Bisco seal removal,
18 using a threaded rod, occurring in Aux Building, Elevation
19 832, where it's alleged that the insulation was scraped off
20 by the rod, and further evaluation may be in order for these
21 cables and similar problems could be elsewhere, our TRT
22 staff examined the NCR books and selected a random sample
23 of NCR's pertaining to this nature of allegation, and they
24 determined that the allegations for rework of the terminal
25 blocks and the repairing of a solenoid in an unauthorized

1 pulling of cables without paperwork and the cable damage
2 from the removal of a Bisco foam seal fire-retardant material
3 in the Aux Building, they felt that that didn't primarily
4 contribute to anything of safety significance. The review
5 of these NCR's couldn't identify any inconsistencies or
6 deficiencies that would imply a question of safety. It
7 appears that any inconsistencies in the NCR's were insig-
8 nificant to the issue of the removal of the Bisco seal in
9 particular. The review that the TRT Team did was strictly
10 a paper review in this case. That was the allegation or
11 concern that you had.

AGC-31

12 MR. WESSMAN: Help us out a little on this one, if you
13 can. I think we weren't successful in pinning anything
14 specific down on the Bisco seal, at least as far as we can
15 tell on the sample of the NCR's; and this kind of relates
16 to the issue on the Bisco seal, and I think it relates to
17 another one that you raised concerning solenoid work without
18 paperwork and the work on termination blocks. It really
19 relates to about three issues that you raised. We haven't
20 been able to pin anything down.

21 MR. JOHNSON: It was the modification of the solenoid
22 and the terminal blocks and the repair that was being done
23 that we believe that was of your concern, but I think the
24 question is quite appropriate. Did you have other areas
25 other than this one that you have cited, because you

mentioned in your allegation that similar problems may be elsewhere. Was that speculative on your part?

██████████ Could we go off the record just a minute?

(A discussion was held off the record.)

MR. WESSMAN: Let's go back on the record and let me summarize what we were talking about a little bit while we were off the record. I want to clarify one aspect, specifically regarding Bisco seals. We also want to clarify that the general discussion involved several of the concerns raised by ██████████. We started talking on AQE34. The general discussion we're covering really relates to AQE34, AQE35, which concerns NCR's concerning traceability of terminal blocks; AQE37, which concerns paperwork conflict regarding terminal blocks; and AQE38, which concerns repair of solenoids without paperwork.

In all of these cases the final result of the TRT inspection effort, after examining a sample of NCR's in this general area, I think can be summarized as we really couldn't find anything that was really wrong with the work on the terminal blocks, the work on the Bisco seal, or the repair of the solenoids; and to the best of our knowledge, the corrective action system on these components is working as was intended by both the NRC and the applicant.

Now, also while we were off the record we talked about an IE Information Notice, IE Notice No. 84-47. This IE

7c
AQE-1
AQE-2
AQE-3
AQE-4

1 Notice is entitled "Environmental Qualification Test in
2 Electrical Terminal Blocks". In part, the issues raised by
3 [REDACTED] at Comanche Peak resulted in enough evaluation
4 by the NRC staff that we felt additional information to the
5 industry regarding terminal blocks was appropriate and was
6 issued as part of this IE Notice.

7 Now, while we were off the record, we also discussed
8 the details of Bisco seals. If you would, [REDACTED] tell us,
9 since we didn't find the specific Bisco seal of interest,
10 what else we could look at to help research the problem with
11 the Bisco seals a little more clearly.

12 [REDACTED] To give you an idea of what I ran across
13 at the time of the discovery of this particular situation,
14 there is another inspector, [REDACTED] and myself, which we
15 were assigned to the [REDACTED]

16 and we were inspecting cable tray covers at the time. We
17 happened to notice that some cable pullers were trying to
18 obtain some more slack in some cables that were coming
19 through a floor penetration or conduit. The conduit itself
20 was filled to the maximum to where she could barely get the
21 all-threaded rod which they were using down and the conduit
22 to clear the Bisco seal, to break it loose to where they
23 could free the cables.

24 MR. WESSMAN: I'm sorry. What kind of rod was it again?

25 [REDACTED] It was a piece of all-threaded rod.

MR. WESSMAN: All-thread rod?

[REDACTED] Yes, sir.

MR. WESSMAN: Okay. Go ahead.

[REDACTED] There was another inspector involved also.
His name was [REDACTED] which he was in the Control Group.

MR. WESSMAN: [REDACTED]

[REDACTED] I believe so; I'm not really sure of the spelling or any other part of his name. We believed that he was watching these people that were working on these cables as far as trying to obtain slack. So [REDACTED] and myself, we didn't really say anything until we saw them using the all-thread rod. They had placed Scotch 33 tape on the all-thread rod while they had it down inside the sleeve, and when they pulled it out at this point and period in time, the all-thread rod was bent due to the force of applying pressure on the rod to try and free the cables, to break them loose. The all-thread rod was down inside the sleeve approximately maybe a foot, and at that point and period of time [REDACTED] and I, we asked [REDACTED] if he was watching this operation and he said no, he thought we were. Come to find out, the craft had no QC witness as far as the operation that was performed. When they brought the all-thread rod back out of the sleeve, initially the rod was stuck. When it did free the rod and removed it from the sleeve, the Scotch 33 was hanging off of the all-thread, exposing the thread which was down inside

AGE-3A

7c

1 the conduit sleeve.

2 This raised concern as far as to what extent cable
3 damage had taken place as far as inside the sleeve. The
4 cable itself was all B-train. The disposition of what we
5 heard was going to be coming out on the NCR was that they
6 were going to determ all the cables and fill the sleeve with
7 water and megger all the cables.

8 MR. WESSMAN: Determ; you mean determinate? 7c

9 [REDACTED] Right; determinate all the cables, and
10 perform a megger test on all the cables with the sleeve filled
11 with water. Now, this was to our initial understanding of
12 what was going to take place on the NCR. Instead, the NCR,
13 the next time we saw it, was a use-as-is disposition. We
14 heard it was due to the fact of rework. It was in discussion
15 through management for approximately two to three days as
16 far as our supervision over this NCR. Also, on the dispo-
17 sition, the way it was worded when it came back on the NCR,
18 was visual inspection of cables in sleeve, only showed
19 minor jacket indentation from the all-thread rod. I know
20 for a fact myself I can't see down inside that conduit sleeve
21 for more than maybe three or four inches. That rod was down
22 there in excess of a foot, or a foot, in excess. By the
23 time Engineering tried to locate the all-thread rod, the
24 craft had straightened it, so we no longer had a bent rod.
25 Also, it was taped up with duct tape at that time, by the

1 time Engineering saw it. So, more or less the craft had
2 undone what they had done as far as what we had as evidence.
3 We should have confiscated the all-thread rod at that time.
4 I felt very uneasy as far as the disposition on that par-
5 ticular NCR.

6 MR. WESSMAN: Do you recall the NCR number?

7 [REDACTED] No, sir. I can obtain the number, and I
8 will give it to you. NCR # E84-00673

9 MR. WESSMAN: Okay. I will ask that you call us on
10 that in a couple of days and give us that number so we can
11 pursue it. About what time did this occur? Last summer? 1984

12 [REDACTED] Yes, sir. It was this past summer.
13 Actually, I'd say around January, maybe February. 7c

14 MR. WESSMAN: January, February 1984 then?

15 [REDACTED] Yes, sir.

16 MR. WESSMAN: You said it was on the B-train, and I
17 believe your original concern said it occurred in the
18 Auxiliary Building on 832-foot elevation; is that correct?

19 [REDACTED] Yes, sir.

20 MR. WESSMAN: Do you know what system or component was
21 involved?

22 [REDACTED] No, sir, I don't. generic concern

23 MR. WESSMAN: Do you know of any other situations where
24 they were using all-thread rods in this manner to where
25 cables might have been damaged?

1 and let us take a look at what the NCR says, and we'll make
2 a decision and see what else we need to assess on.

3 MR. JOHNSON: May I ask a few questions?

4 MR. WESSMAN: Sure; go ahead.

5 MR. JOHNSON: [REDACTED] you indicated that this was
6 a floor penetration.

7 [REDACTED] Yes, sir.

8 MR. JOHNSON: Was this--the penetration to the floor
9 was overhead in the Auxiliary Building or was it below?
10 Which way are we going?

11 [REDACTED] Okay. On the 832 level it was below as
12 far as in the floor. It rises out of the floor approximately
13 six to seven inches.

14 MR. JOHNSON: This was not a cable pull; or was it?

15 [REDACTED] No, sir. They were trying to obtain the
16 slack in the cable.

17 MR. JOHNSON: So there was no procedure to control?

18 [REDACTED] As far as what they were to use--as far
19 as what craft was to use to--

20 MR. JOHNSON: --obtain slack.

21 [REDACTED] Well, no, to remove the Bisco seal, or
22 break it loose.

23 MR. JOHNSON: This operation or activity was primarily
24 to break the Bisco seal?

25 [REDACTED] Yes, sir. Bisco had come in and they

AGE-34

7c

1 filled the conduit sleeve.

2 MR. JOHNSON: This is a fire protection type of media--

3 [REDACTED] Right.

4 MR. JOHNSON: --and it's to be cleaned out, and after
5 that was cleaned out, then they would be able to go in and
6 pull slack in the cable.

7 [REDACTED] Yes, sir.

8 MR. JOHNSON: In pulling the slack of the cable once
9 the Bisco seal was removed, was that activity governed by
10 procedure?

11 [REDACTED] Yes, sir, it is.

12 MR. JOHNSON: That's a hand-pull, isn't it?

13 [REDACTED] Yes, sir.

14 MR. JOHNSON: Was there any soaping involved? Cable
15 soaps.

16 [REDACTED] To my knowledge now, I did not have any
17 further involvement other than to work the NCR. I do know
18 for a fact that after the NCR was written and our super-
19 vision went to their meetings for the next few days, my
20 supervisor, which was [REDACTED] at that time, came back
21 and sat down across-[REDACTED] desk was facing mine at that
22 time, okay? He sat down with [REDACTED]-and this is a statement
23 that was made out there pretty regularly as far as, "Okay,
24 you reported the incident"--which we did as far as the NCR--
25 "the responsibility is taken off of you. It's in

AGE-34

7c

1 Engineering's hands. Engineering saw fit to justify it
2 as far as this being the answer. You reported it; Engineering
3 has taken responsibility for it; it's out of your hands. Do
4 you have any problem with it?" [REDACTED] said no. I can under-
5 stand that situation. I have no problem as far as rebuttal
6 of Engineering's decision. The only problem I had with it
7 was the fact that I know what I saw. I don't feel that the
8 justification was just. I don't feel that the proper
9 evaluation was done. Now, this is on my own mind, so I told
10 my supervisor when he came up and started telling me the
11 same story which was more or less the same story which he
12 had given [REDACTED] as far as this is off our back; he asked me
13 if I had a problem with it. "No, I don't really have a
14 problem with it as far as documentation-wise, but, yes, in
15 my own mind, I still have a problem with it." That after-
16 noon I was transferred to Unit Two.

7c

AQE-34

17 MR. JOHNSON: Was this an in-process inspection?

18 [REDACTED] No, sir. It was supposed to have been
19 an in-process. They had no QC with them at the time.

20 MR. JOHNSON: [REDACTED] you thought was--

21 [REDACTED] We thought he was watching it.

22 MR. JOHNSON: And he thought you were watching it.
23 Okay. But it wasn't an in-process inspection. Would you
24 know what the final outcome of that particular conduit floor
25 penetration is to date?

BROWN & ROOT, INC. CPSES JOB 35-1195	PROCEDURE NUMBER	REVISION	EFFECTIVE DATE	PAGE
	CI-CPM 5.12	3	6/8/83	1 of 5

TITLE:

PENETRATION SEALS -
AREA RELEASE
OCN#1

ORIGINATOR:

REVIEWED BY:

APPROVED BY

CONSTRUCTION PROJECT MANAGER

5-25-83
DATE

6-4-83
DATE

6-7-83
DATE

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PURPOSE

SCOPE

RESPONSIBILITY

DEFINITIONS

PROCEDURE

RELEASE FOR HIGH DENSITY SEALS

REFERENCES

1.1 TUSI Contract CP-0707

1.2 Room Schedule for Penetration Seals or Room Turnover Schedule

1.3 Item Removal Notice Procedure CP-CPM 6.10.

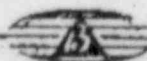
GENERAL

PURPOSE

This procedure establishes the methods and controls for notification to the various jobsite organizations for release of rooms and/or areas for penetration sealing.

SCOPE

This procedure shall apply to the notification of the scheduled date for installation of penetration seals on a room by room basis in accordance with Reference 1.2 and release of the room and/or area for the penetration seal contractor to perform actual sealing activities in accordance with Reference 1.1.



17 Pages - Al Johnson

BROWN & ROOT, INC. CPSES JOB 35-1195	PROCEDURE NUMBER	REVISION	EFFECTIVE DATE	PAGE
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2.3 RESPONSIBILITY

The Area Management Group is responsible for scheduling and notification of release of rooms and/or areas to the Procurement Management Group.

The Penetration Seal Contractor is responsible for actual sealing of the penetrations in accordance with Reference 1.1.

The Production Control Group is responsible for the statusing of completed penetration seals.

The Procurement Management Group is responsible for the coordination and overall management and/or administration of the penetration seal contractor.

2.4 DEFINITIONS

2.4.1 Area Management Group

The organization which schedules, releases rooms and/or areas for penetration seal work.

2.4.2 Penetration Seal Contractor

The organization which performs the actual installation of penetration seals in accordance with Reference 1.1.

2.4.3 Production Control Group

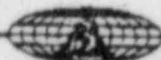
The organization which statuses the completion of penetration seal work.

2.4.4 Procurement Management Group

The organization which coordinates and performs the overall management and/or administration of the penetration seal contractor.

3.0 PROCEDURE

3.1 The Area Management Group shall notify the appropriate Engineering and craft personnel two (2) weeks prior to the scheduled date for penetration seal work within rooms and/or areas. Copies of the approved contractor's field survey drawings shall be forwarded to the craft and the discipline engineers.



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3.2 Each discipline superintendent shall perform all outstanding work within the rooms and/or areas for penetrations requiring seals. Each discipline superintendent (Piping, Electrical, Instrumentation, Millwright) shall determine that all penetrating items are installed in accordance with approved design documents and/or design changes.

3.3 Each discipline Engineer shall determine that the design for penetrating items is complete, and notify the Area Management Group of any incomplete designs that could affect the penetration sealing work.

3.4 The Area Management Group coordinates work for resolution of any unsatisfactory items and requests final QC inspection (excluding electrical) prior to sealing.

3.5 The Area Management Group shall identify areas ready for penetration seals to the Procurement Management Group.

3.6 The Procurement Management Group shall direct the penetration seal contractor to proceed with actual seal installation in accordance with Reference 1.1.

3.7 Removal of penetration seals which contain safety-related penetrating members shall be documented in accordance with CPM 6.10.

Removal of penetration seals which contain only nonsafety-related penetrating members shall be documented in accordance with CPM 6.10 with the following exceptions:

1. the initiator shall identify on the IRN and in the log that the subject removal is non-QC in nature;
2. the QC signature block shall be "N/A'ed" by the initiator and no QC involvement is required;
3. the IRN coordinator shall forward the original IRN to the Permanent Plant Records Vault instead of to QC.

In either case, a copy of the IRN shall be forwarded to Area Management for contractor notification.

3.8 The seals may be removed by the craft if the entire seal is required to be removed. If only a partial removal is necessary, Bisco shall be contacted to make the partial removal.

4.0 RELEASE FOR HIGH DENSITY SEALS

4.1 The release of penetrations which receive high density seals shall be as described above. Additionally, the Release for Penetration Sealing (Attachment 1) form shall be completed prior to the placement of the seals.



VOID per OCA 1

JOB 35-1195

COMANCHE PEAK STEAM ELECTRIC STATION

Construction Procedure
DOCUMENT CHANGE NOTICE NUMBER 1

Notice applicable to Construction Procedure No. 35-1195- CI-CPM 6.12 Rev. 3

This change will be incorporated in the next revision of the procedure.

Change the procedure as follows:

Please replace the following with the attached:

page 3 of 5.

Reviewed by:

[Signature] 2-17-84
Originator Date

[Signature] 2-17-84
Brown & Root Quality Assurance Date

Approved by:

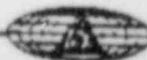
[Signature] 2-20-84
[Signature] 2/20/84
TUGCO Quality Assurance Date

[Signature] 2-27-84
Construction Project Manager Date

02/28/84
Effective Date



BROWN & ROOT, INC. CPSES	PROCEDURE NUMBER	REVISION	EFFECTIVE DATE	PAGE
JOB 35-1195	CI-CPM 6.12	3	06/08/83	3 of 3
3.2	Each discipline superintendent shall perform all outstanding work within the rooms and/or areas for penetrations requiring seals. Each discipline superintendent (Piping, Electrical, Instrumentation, Millwright) shall determine that all penetrating items are installed in accordance with approved design documents and/or design changes.			
3.3	Each discipline Engineer shall determine that the design for penetrating items is complete, and notify the Area Management Group of any incomplete designs that could affect the penetration sealing work.			
3.4	The Area Management Group coordinates work for resolution of any unsatisfactory items and requests final QC inspection (excluding electrical) prior to sealing.			
3.5	The Area Management Group shall identify areas ready for penetration seals to the Procurement Management Group.			
3.6	The Procurement Management Group shall direct the penetration seal contractor to proceed with actual seal installation in accordance with Reference 1.1.			
3.7	<p>Removal of penetration seals shall be documented on an IRN in accordance with CPM 6.10 in <u>every</u> case of removal.</p> <p>Removal of penetration seals which contain only nonsafety-related penetrating members need not be documented in accordance with CPM 6.10 with the following exceptions:</p> <ol style="list-style-type: none"> 1. the initiator shall identify on the IRN and in the log that the subject removal is non-Q in nature; 2. the QC signature block shall be "N/A'ed" by the initiator and no QC involvement is required; 3. the IRN coordinator shall forward the original IRN to the Permanent Plant Records Vault instead of to QC. <p>In either case, a copy of the IRN shall be forwarded to Area Management for contractor notification.</p>			
3.8	The seals may be removed by the craft if the entire seal is required to be removed. If only a partial removal is necessary, Bisco shall be contacted to make the partial removal.			
4.0	<u>RELEASE FOR HIGH DENSITY SEALS</u>			
4.1	The release of penetrations which receive high density seals shall be as described above. Additionally, the Release for Penetration Sealing (Attachment 1) form shall be completed prior to the placement of the seals.			



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The form shall be initiated by PMG and submitted to Area Management for routing to the organizations responsible for signing the form. After completion of the form, Area Management shall return the completed form to PMG who may then authorize the sealing of the penetration.



BROWN & ROOT, INC. CPSES JOB 35-1196	PROCEDURE NUMBER	REVISION	EFFECTIVE DATE	PAGE
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ATTACHMENT 1

RELEASE FOR HIGH DENSITY PENETRATION SEALS

Room No./Area _____

BISCD Drawing No.(s) _____

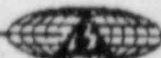
Penetration No.(s) _____

The penetration(s) identified above have been evaluated and are released for sealing. (Any exceptions should be listed by Penetration No. in space provided.)

	Signature	Date	Exceptions
Mechanical Engineering			
Electrical Engineering			
Instrumentation Engineering			
General Mechanical Superintendent			
General Civil Superintendent			
General Electrical Superintendent			
Instrumentation Superintendent			
Brown & Root QA (ASME) To be released in accordance with CP-QAP-12.1			
TUGCO QA (Non-ASME)			
TUGCO QA Electrical			
TUGCO QA Instrumentation			

After signature, route to the next discipline.

Upon completion of this release, forward to the Procurement Management Group.





PRODUCTION
PROCEDURE COVER SHEET

FOR INFORMATION ONLY

#238-3

Procedure No.	Dated	Revision No.
SP 107	June 2, 1982	- 2 -

COMANCHE PEAK



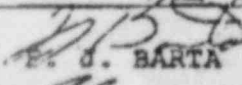


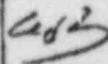
TITLE: REPAIR AND REWORK OF BISCO SILICONE BASE
PENETRATION SEALS

SUBJECT: REPAIRING OR REWORKING OF BISCO PENETRATION SEALS
MADE FROM SILICONE BASE MATERIALS

SCOPE OF CURRENT REVISION:

REVISED SECTION 4.1 AND ADJUSTED SUBSEQUENT
NUMBERING

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BISCO APPROVAL SIGNATURES							
	Original Issue	Rev. 1	Rev. 2	Rev. 3	Rev. 4	Rev. 5	Rev. 6
Author	 E. J. BARTA						
Q. C. Approval	 E. J. BARTA						
Management Approval	 C. W. BROWN						



PRODUCTION PROCEDURE

FOR INFORMATION ONLY

TITLE: REPAIR AND REWORK OF BISCO SILICONE BASE PENETRATION SEALS	SP - 107
<p>1.0 PURPOSE</p> <p>To define the methods applicable to repair or rework penetration seals made from silicone base materials.</p> <p>2.0 SCOPE</p> <p>To establish a standard method for the repair or rework of a BISCO penetration seal, so that the resultant penetration seal will meet all applicable requirements.</p> <p>3.0 RESPONSIBILITY</p> <p>3.1 The BISCO Project Manager shall be responsible for identifying and scheduling the work.</p> <p>3.2 The BISCO designated technician(s) shall be responsible for the formulation and installation of silicone materials.</p> <p>3.3 The BISCO Quality Control Department is responsible for the various inspections of the work in accordance with applicable Quality Control procedures.</p> <p>3.3.1 Quality Control shall verify and control the documentation of the repair or rework of penetration seals.</p>	



PRODUCTION PROCEDURE

FOR INFORMATION ONLY

TITLE: REPAIR AND REWORK OF BISCO SILICONE BASE PENETRATION SEALS	SP - 107
<p>4.0 REMOVAL OF SILICONE POAM MATERIALS</p> <p>4.1 Any voids shall be repaired by filling with the same silicone materials as initially filled in the penetration. Cured silicone shall be removed to a depth beyond the void 2" and the repair material shall be installed.</p> <p>4.2 Removal of areas to be repaired shall be effected by hand, wherever possible.</p> <p>4.3 Extensive areas of silicone seal removal can be accomplished by common cutting or scraping instruments, razor knives, saws, etc.</p> <p>4.4 Where electrical cables are present, blunt nonconductive tools shall be used, and care shall be taken not to damage existing cables.</p> <p>4.5 Where possible, power to penetrating cables should be de-energized during the removal of material.</p> <p>5.0 SURFACE PREPARATION</p> <p>5.1 Where the exposed surface has been contaminated by a foreign material, such as dirt, dust, grease, cable pulling compounds, water, etc., all such contaminated surfaces shall be removed to expose a fresh surface for bonding.</p> <p>5.2 Where the silicone material has been removed for clearance to add a new pipe, conduit, cable, etc., the added item shall be installed by others.</p> <p>5.3 The silicone material should not support the weight of the new penetrating item unless otherwise specified.</p>	

PRODUCTION PROCEDURE

FOR INFORMATION ONLY

TITLE: REPAIR AND REWORK OF BISCO SILICONE BASE
PENETRATION SEALS

SP- 107

6.0 INSTALLATION

- 6.1 The sealant materials to reseal shall be as initially specified.
- 6.2 Resealant materials shall be installed in accordance with applicable standard installation procedures.
- 6.3 Documentation typical of a new seal shall be kept on each penetration seal repaired or reworked.

7.0 ADDITION OF MATERIALS TO EXISTING SEALS

- 7.1 The BISCO Project Manager or designate shall inspect the areas to be additionally sealed for foreign material, etc., so that the proper sequence of activities can be scheduled.
- 7.2 The total seal or necessary portion thereof shall be sealed using BISCO standard installation procedures as directed by the BISCO Project Manager.
- 7.3 Documentation typical of a new seal shall be kept on the additional area.

8.0 CLEAN-UP

- 8.1 All excess and scrap material shall be removed and properly stored, relocated or disposed of.

END OF TEXT

Date 6/2/82 Rev. 2 Page 4 of 4

1/30/85
FOIA-85-59

Task No. AQE-35

D/395

Allegation Category: Electrical and Instrumentation 5, Electrical Nonconformance Report (NCR) Activities

Allegation Number: AQE-1, AQE-2, AQE-3, AQE-4, AQE-5, AQE-25, AQE-33, AQE-34, AQE-35, AQE-37, AQE-38, AQE-40, AQE-41, AQE-42, AQE-45, AQE-47, AQE-48, AE-24, and parts of AE-22, AE-27, AQE-12, AQE-36 and AE-50.

Characterization: It is alleged that the validity of the generation and disposition of electrical nonconformance reports (NCRs) was suspect.

Assessment of Safety Significance: The implied safety significance of these allegations is that the quality of the electrical installation could be indeterminate.

SSER-7
J 49

These allegations pertain to various concerns involving the NCR program, and include:

- ° Prevalent "use-as-is" dispositions of NCRs (AQE-33, AQE-47, AQE-34, AQE-35, Parts of AE-27 and AQE-36).
- ° The traceability of "Q" items (non-Q fuse blocks were installed where Q blocks were required) (AQE-35).

The TRT interviewed a TUEC electrical engineer and a lead quality engineer (QE) about the "use-as-is" disposition of electrical NCRs (AQE-33, AQE-47, AQE-34, AQE-35 and parts of AE-27, and AQE-36). The TRT determined that for an NCR to receive a "use-as-is" disposition, an independent verification inspection by an electrical engineer had to be made for each reported item of nonconformance. Based on that inspection, and on an evaluation with regard to procedures, specifications, drawings (including applicable codes and standards), and other related documentation, a "use-as-is" disposition could be applied. Final approval of such a disposition required two QE signatures. The TRT also reviewed the 75 NCRs to determine if there were any with the disposition "use-as-is" with the explanation "not addressed in ES-100," as alleged. The TUEC engineer also indicated that should an NCR be received with this type of disposition, it would be "kicked back" and would require more justification.

SSER-7
J 51

The TRT determined that if the nonconformance indeed was not addressed in ES-100, then a document, such as a procedure or other specification, that did address this nonconformance item would be required to be referenced in the NCR. Of the 75 NCRs examined, the TRT could identify no "use-as-is" dispositions which deviated from applicable design requirements, except for those identified in Electrical and Instrumentation Category 1, "Electrical Cable Terminations," and Electrical and Instrumentation Category 2, "Electrical Cable Tray and Conduit Installation," regarding NCRs identifying bent terminal lugs in motor control centers

(continued)

1/30/85

AQE-35 (continued)

(part of AQE-36), and reporting two loose conduit elbow fittings (part of AE-27), respectively. These TRT findings were discussed with the allegers, one of whom disagreed with the TRT findings as related to AQE-34 and AQE-35 and provided additional information. The TRT is currently evaluating this new information and will report its findings in a supplement to this SSER.

SSER-7
J51

The TRT interviewed QC and purchasing personnel and an electrical general foreman for construction, and reviewed pertinent documentation to determine the adequacy of traceability of safety-related (noted as "Q") items (AQE-35). The TRT determined that procedures and controls, if properly followed, were adequate to ensure the traceability of "Q" items and that they would preclude the possibility of substituting "non-Q" for "Q" items. The TRT reviewed a large number of installation documents and found all the required traceability documentation.

SSER-7
J52

Conclusions and Staff Positions: Based on the reviews of the pertinent documentation, examination of NCRs, and the information obtained from the interviews, the TRT concludes that adequate procedures, controls, and process checks exist for the generation and disposition of reported items of nonconformance a. related to the concerns raised by the above allegations. The TRT also concludes that of the allegations identified at the outset of this section, only a few specific instances were found which raised questions concerning the adequacy of safety-related items. These are discussed above and are discussed further in other sections of the report.

SSER-7
J53

The results of this evaluation will be further assessed as part of the overall programmatic review of all NCRs addressed under QA/QC Category 5, "Nonconformance Reports," and under QA/QC Category 6, "QC Inspection." Therefore, the final acceptability of this evaluation will be predicated on the satisfactory result of the overall programmatic review on these subjects. Any adjustments to these conclusions will be reported in a supplement to this SSER. The results of the TRT review of new information concerning allegations AQE-34, AQE-35 and AQE-37 will also be reported in a supplement to this SSER.

REFERENCE DOCUMENTS:

1. NCR No. E83-023885 R.1, 10/20/83 — Attached 7c
2. NCR No. E83-023285, 10/10/83 — Attached
3. Testimony: Alleger [REDACTED] Oct 30, 1984
Granbury, Tx — Pages 35-39 — Attached

1/30/85

AGE-35 (continued)

REVIEWERS COMMENTS :

The alleged, in his testimony, also maintained that traceability ^(namely identification) of safety-related items was lost, when ^{from the control room storage area} the craft drew components, for station modifications of the control room panels. The NCRs written against ^{Perach's drawing} Buchanan type 0211 terminal blocks was cited by the alleged as nonconfirming, in that the documentation was insufficient to identify these components as safety-related (Q) as opposed to non-safety items (nm-Q). The alleged's concern was the possible inadvertent use of nuclear grade components with those used for non-safety-related applications.

The alleged, in his testimony, maintained the non-safety-related (nm-Q) fuses and fuse blocks may have been used in safety-related (Q) applications, and that material receipts (MRs) did not exist to control requisitioning of safety-related (Q) components to the craft.

1/30/85

AQE-35 (continued)

4. During preoperational and hot functional testing at CPSES, spring and early summer 1983, non-Q fuse blocks and fuses were installed in panel CP1-EIPRC-09 in unit 1 to accommodate testing through the operability of this equipment (refer to traveler no's EE83-0214-7404 and EE83-0215-7404). Safety-related (Q) fuses and fuse blocks for the AC and DC fuse panels of CP1-EIPRC-09 were later installed (summer 1983) replacing the non Q components installed earlier (refer to traveler no's EE-83-0450-7404 and EE-83-0451-7404) once this testing was complete. The UCR of EE83-02328 S disposition identifies the above sequence of work which was performed. It also identifies the requisitioning of Q material purchased under requisition no. R17484 (safety-related). The safety-related replacement work, including materials, were completed.

1/30/35

AQE-35 (continued)
 under DCA 16,034-20-2 and
 DCA 17,398. The start-up inspection
 program verified the fuse and
 fuse block installation under
 procedures CP-SAP-20 and XCP-EE-8
 substituting the receipt inspection
 for the fuses. No QA inspection
 was required other than the
 overview of start-up activities
 governed by these procedures.

4 During the human factors engineering
 program modifications to the
~~main~~ control panels in the
 control room required bulk
 purchases under purchase order
 CPO-605. Receipt inspection
 utilizing a material receiving report
 (MRR) ^{reviewed and} identified the safety-related
 (Q) Buchanan type 0211 terminal
 blocks as safety-related
 materials. ^(receiving inspection documentation records) No Buchanan
 type 0211 terminal blocks were
 ordered nor received. All the
 bulk materials for implementing
 the station modifications to the
 control panels were then
 transferred from the warehouse
~~storage~~ to a storage location

1/30/85

in the control room, where the craft were then ~~were~~ required to draw the bulk items and perform the mod-~~ifications~~. The QC inspection activities were performed after the modification work was completed, which did not require ^{documented} information ^(other than the purchase order information CPO 605) of the Buchanan type 0211 terminal blocks, as these were classified as bulk items in accordance with procedure CP-CPM 8.1 Rev 1, paragraph 3.4. The Buchanan 0211 terminal blocks are readily identifiable ^(as replacement parts for Reliance Electronics equipment) and cannot be easily used in place of, or substituted by other terminal blocks of other manufacturers. The replacement of the damaged Buchanan type 0211 terminal block on panel CP1-EIPRCI-10 was appropriately dispositioned on NCR E83-002194 5 as "Use as is."

1/30/35

C The TRT ~~has~~ ^{is} ~~examined~~ ^{examines} of the pertinent ~~files~~ ^{trawlers}, purchase ~~records~~ ^{and} ~~documentation~~ ^{and} ~~allegations~~ ^{that} adequate ~~procedures~~ ^{and} ~~process~~ checks exist for the disposition of reported items of non conformance as related to the concerns raised by the above allegations.

Actions Required : None

Page 1 of 3

UNIT	STRUCTURE/SYSTEM	ITEM/COMPONENT	TAG ID NUMBER	LOCATION OR ELEVATION	RIR NO
1	Aux 65	Control Panels	*SEE Below	Room 135 830	N/A

NONCONFORMING CONDITION

THIS NCR AFFECTS FUSES ONLY ALL OTHER WORK MAY CONTINUE. 9/8/83

QA RECORD I

RTN. QA REVIEW
2 6/10/83
FILE NO.
15.1
SUBFILE NO.
NCR-110

SEE ATTACHMENT
ARMS
INDEXED

2 Hold Tags APPLIED

REFERENCE DOCUMENT: **SEE ATTACHMENT REV _____ PARA _____

REPORTED BY: Richard W. Biele DATE: 8/24/83QA REVIEW/APPROVAL: Wesley M. Mather DATE: 8/27/83
ACTION ADDRESSEE: Reppewell DEPARTMENT: EngineeringDISPOSITION: REWORK _____ REPAIR _____ USE AS IS XXX SCRAP _____

Items purchased under req. #R17473 were installed under operational travelers EE-83-0215-7404 and EE-83-0214-7404. They were removed and returned to non-IE storage (step 3 & 5 of travelers EE-83-0451-7404 and EE-83-0450-7404) these same travelers installed material purchased under req #R17486. Use as is.

Installed fuses are verified via CP-SAP-20 and XCP-EE-8. The only QA involvement required is through the Start-up program overview. (See EE-83-0215-7404 and EE-83-0214-7404).

INFORMATION
COPY
PPRV

ENG. REVIEW/APPROVAL: W. W. Biele DATE: 10/5/83QA REVIEW APPROVAL: Wesley M. Mather DATE: 10/6/83DISPOSITION VERIFICATION & CLOSURE: 10/10/83 DATE: 10/10/83COMMENTS: HOLD TAGS REMOVED. See Tag 10-7-83

INFORMATION
COPY

NCR E83-023285 Page 2 of 3

PPRV SAFETY RELATED FUSES RECEIVED AND PRESENTLY INSTALLED IN
CPI-EIPRCI-09 AND *CPI-EIPRCI-10 UNDER MR 244114, ARE OF
SAME TYPE/STYLE AS NON-SAFETY RELATED FUSES REMOVED
WHICH ORDERED UNDER REQ. NO. R12473. AT PRESENT THERE IS NO
WAY TO IDENTIFY A SAFETY RELATED FROM A NON-SAFETY RELATED
FUSE. ** PER ANSI N45.2 PARA 14 "SPECIAL ATTENTION SHALL BE GIVEN
TO PROVIDING ADEQUATE INSTRUCTIONS FOR MARKING AND LABELING FOR
PACKAGING, SHIPMENT, AND STORAGE OF ITEMS. MARKING SHALL BE
ADEQUATE TO IDENTIFY, MAINTAIN, AND PRESERVE THE SHIPMENT,
INCLUDING INDICATION OF THE PRESENCE OF SPECIAL ENVIRONMENTS
OR THE NEED FOR SPECIAL CONTROL."

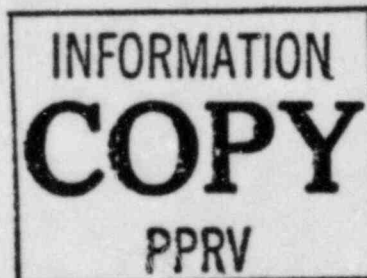
PER CONVERSATION WITH START UP ENGINEER "NON-SAFETY RELATED
FUSES ARE INSTALLED IN SAFETY RELATED EQUIPMENT." THROUGH
RESEARCH INTO STORAGE OF FUSES THE ELECTRICAL TEST GROUP
FIELD STORAGE ONLY ISSUES NON-SAFETY RELATED FUSES
AS INSTRUCTED BY START UP ENGINEERS THIS SITUATION LEAVES
DOUBT IF ALL FUSES INSTALLED IN SAFETY RELATED EQUIPMENT
IN FACT ARE SAFETY RELATED. PER ** TNE-PR-3, "THE SAFETY
CLASSIFICATION OF A PART IS DETERMINED BY ITS ~~FOR~~ FUNCTION OF
THE EQUIPMENT THE PART SUPPORTS. IF THE PART CONTRIBUTES TO THE
SAFETY-RELATED FUNCTION OF THE EQUIPMENT IN WHICH IT IS
INSTALLED, OR IF FAILURE OF THE PART WOULD DEGRADE THE SAFETY-
RELATED FUNCTION OF THE EQUIPMENT, THE PART IS SAFETY-RELATED."

CONSEQUENTLY THROUGH THE POSSIBILITY OF NON-SAFETY RELATED
FUSES INSTALLED IN SAFETY RELATED EQUIPMENT, AND KNOWN INSTALLED
NON-SAFETY RELATED FUSES BEING INSTALLED IN SAFETY RELATED

NCR E83-023285 page 3 of 3

EQUIPMENT DURING FUNCTIONAL TESTING, LEAVES RESULTS OF ACTUAL TEST PERFORMED INDETERMINATE. NO DOCUMENTATION EXIST TO ALLOW THIS CONDITION PER IEEE 323-1974 PARA. 4 "WITH ALL QUALIFICATION METHODS, THE END RESULT MUST ~~BE~~ ^{Demonstrate P. 17483} THE DOCUMENTATION THAT MUST ~~DEMONSTRATE~~ THE EQUIPMENT'S ADEQUACY TO PERFORM ITS REQUIRED FUNCTION. THE DOCUMENTATION MUST BE IN A FORM THAT ALLOWS VERIFICATION BY COMPETENT PERSONNEL OTHER THAN THE QUALIFIERS AND SHOULD CONTAIN THE PERFORMANCE REQUIREMENTS, THE QUALIFICATION METHOD, RESULTS, AND THE JUSTIFICATIONS.

SEE ATTACHMENTS 1 AND 2
ATTACHMENT 1 R-17486
ATTACHMENT 2 R-17473



TEXAS UTILITIES GENERATING COMPANY

NCR E83-023286
ATTACHMENT 1

CPSES FIELD REQUISITION — CONSTRUCTION

No A 17486

THIS IS NOT A PURCHASE ORDER

DEPARTMENT: ELECTRICAL ENGINEERING

REQUISITION NO CP-0605 Supp 60

INTENDED USE: H₂ ANALYZER AND CORL

DATE 2/8/ 1983

EXIT THERMOCOUPLE RACKS

DATE REQUIRED 2/25/83

CPI-EIPRCI-09 & CPI-EIPRCI-10

ESTIMATED COST -- \$

STREET

CITY

STATE, ZIP

SHIP VIA

SHIPPING DATE:

FOB

TERMS:

ITEM NO.	QUANTITY WANTED	U.I.	DESCRIPTION <small>Give complete descriptions, ratings, catalog nos., etc. Attach specifications, if required.</small>	UNIT PRICE	TOTAL	COST CODES
			THE FOLLOWING MATERIALS TO BE PROCURED FOR INSTALLATION AT RACKS CPI-EIPRCI-09 AND CPI-EIPRCI-10. THE MATERIALS SHOULD MEET THE REQUIREMENTS OF SPECIFICATION 23.23-MS-605.			
1	30	ea	FUSE BLOCKS 250V 30AMP 25 AMPULET G.E. TYPE 8421-3		MR 244406	
2	75	ea	BUSS ONE-TIME FUSE NON3 (3 AMP. RATED 250V)		MR 244114	

INFORMATION
COPY
PPRV

SAFETY RELATED

☐ No. Q.A. Required ☒ Safety Related Q.A. required ☐ Q.A. ACCEPTED

DATE:

REQUISITIONER 2/8/83 Bismarck X 480

CONTRACTOR APPROVAL N/A
APPROVED

TUSI APPROVALS
APPROVED: W/ltm 2/8/83

APPROVED

LEAS UTILITIES GENERATING COMPANY

CPSES FIELD REQUISITION — CONSTRUCTION

THIS IS NOT A PURCHASE ORDER

NCR E83-023285
ATTACHMENT 2

VENDOR NAME: WALKER THRU
STREET: 19473
CITY: SLP
STATE, ZIP: SLP
SHIP VIA:
SHIPPING DATE:
F.O.B. TERMS:

DEPARTMENT: ELECTRICAL ENGINEERING
INTENDED USE: H₂ ANALYZER AND CORE
EXIT THERMOCOUPLE RACKS
CPI-EIPRCI-9 & CPI-EIPRCI-10
T/O 7404

REQUISITION NO. 17473
DATE: 1/28/83
DATE REQUIRED: 1/31/83
ESTIMATED COST: \$
BUYER:

ITEM NO.	QUANTITY WANTED	U/I	DESCRIPTION Give complete descriptions, ratings, catalog nos., etc. Attach specifications, if required.	SAFETY CLASS CODE	LEAVE BLANK FOR PURCHASING DEPT.		COST CODE
					UNIT PRICE	TOTAL	
1.	30	ea	FUSE BLOCKS, 250V. 30A, 2-POLE G.E. TYPE 8421-3				
2.	75	ea	BUSS FUSE TYPE NON 3 (3AMP. RATED 250V)				
NOTE:- ITEMS 1 & 2 ARE REQUIRED URGENTLY AT FIELD BY 1/31/83 TO MEET THE T/O SCHEDULE							

INFORMATION
COPY
PPRV

(NON- SAFETY RELATED)

REQUISITIONER: A. Poirer x480
CONTRACTOR APPROVAL:
APPROVED: N/A

No. Q.A. Required ☒ Safety Related Q.A. required ☐ Q.A. ACCEPTED
TUSI APPROVALS
APPROVED: W/Vogel 8/2/83

DATE: 1/28/83
APPROVED:

TEXAS UTILITIES SERVICES INC.

TSG-2996

OFFICE MEMORANDUM

To Ivan Vogelsang (CPPE-Elec.) Glen Rose, Texas September 22, 1983

Subject COMANCHE PEAK STEAM ELECTRIC STATION
Purchasing and Installation Requirements for Fuses

REF: 1) CPP-13,537
2) CP-SAP-20
3) XCP-EE-8
4) TNE-PR-3

The purpose of this memo is to establish an engineering position regarding the purchasing and installation of fuses in safety related circuits as requested by Reference 1.

Background

Fuses have the following attributes:

A fuse failure can degrade the function of equipment in which it is installed.

Fuses are installed in both safety related and non-safety related circuits.

Fuses are mass produced, simple in design and not specially made for the nuclear industry.

Fuses are indelibly marked with parameters that are related to their safety related function (amp and voltage rating).

There are no special storage requirements for fuses.

Fuses are inspected by Start-Up after installation per CP-SAP-20 and XCP-EE-8.

Analysis

The current carrying function of a fuse is related to safety when the fuse is used in a safety related circuit.

The simplicity of construction, commercially available nature, and uniform quality of the commercial product qualify fuses to be procured as a commercial product. (Code C per TNE-PR-3)

The following factors make receipt inspection unnecessary for fuses:

- Marking of fuses with parameters related to safety.
- Lack of special storage requirements.
- Inspection of safety related fuses after installation as mandated by CP-SAP-20 and XCP-EE-8.

INFORMATION
COPY
PPRV

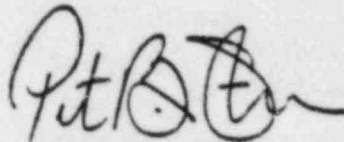
TSG-2996

Page 2


Position

Fuses may be procured Code C per TNE-PR-3, with the Start-Up inspection of the fuses per CP-SAP-20 and XCP-EE-8 substituting for receipt inspection requirements. No QA involvement is required other than overview of Start-Up activities under CP-SAP-20 and XCP-EE-8.

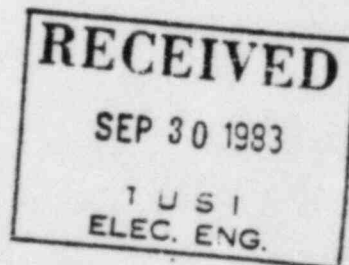
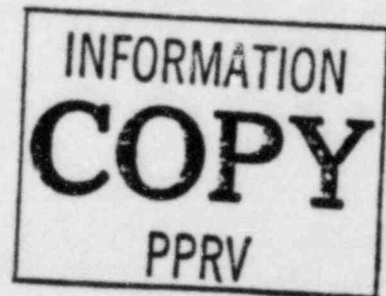
TNE-PR-3 will be revised to reflect this position.



Peter B. Stevens
Supervising Engineer
TUSI Nuclear Engineering


PBS:SAH:aq

cc: L. M. Popplewell - CPPE Elec.
Art London - TUGCO Start-up
W. I. Vogelsang - CPPE-Elec.



CONSTRUCTION OPERATION TRAVELER 35-1195

① TRAVELER NO. EE83-0214-7404	② EQUIPMENT NO. CPI-EIPRCI-09	③ UNIT NO. 1	④ QUANTITY 1	⑤ PAGE 1 OF 1
⑥ ACTIVITY DESCRIPTION INSTALLATION OF FUSE BLOCKS AND FUSES		⑦ REFERENCE DRAWINGS SEE NOTE 1		
⑧ SPEC/PROC/ENG. INSTR. MS-605	⑨ LOCATION CONTROL ROOM FL. 830'-0"	⑩ SYSTEM 7404		
PREPARED BY <i>[Signature]</i>	DATE 2/14/83	DEPT. ELECTRICAL ENGINEERING		
REVIEWED BY <i>Charlie Tamm</i>	DATE 2/14/83			
ANI REVIEW N/A	DATE			

CP NO. DEPT. OPERATION

- NOTE 1:
- (i) Reliance Dwg. M-99AX403-F
Modified by DCA 16,094 Rev. 1 & 16,104
Sht. 1 Rev. 4
Sht. 2 Rev. 3
 - (ii) Gibbs & Hill Dwg. 2323-E1-0136 Rev. 3 modified
by DCA 16,123.

INFORMATION
COPY
PPRV

1. ELECT Pick up 12 double-pole fuse blocks GE type 8421-3 and 24 Buss
fuses type NON 3 purchased against CPF#8960 from NON-Q Rack- 2
in warehouse 'C'.

ELECT Install fuse blocks and fuses (Obtained from OP # 1) on AC and
DC fuse panel on back of rack CPI-EIPRCI-09 temporarily for test
(w) ing purpose only.

~~ELECT Pick up 12 double pole fuse blocks GE type 8421-3 and 24 Buss
fuses type NON 3 from warehouse 'C', material received per
(w) requisition No. R-17486.~~

~~ELECT Remove fuse blocks and fuses installed in OP. No. 2.~~

~~ELECT Install fuse blocks and fuses (obtained from OP #3) for
(w) permanent installation.~~

Upon completion of work, return traveler to Electrical Engineer-
ing Department. Attention: I. Ahmad.

Upon completion of engineering review, forward to Q.E.

REV **Δ** ISSUED TO DELETE STEPS 3, 4 & 5. THESE STEPS HAVE BEEN
SUPERSEDED BY TRAVELER EE-83-0450-7404

WIV 7/15/83
Charlie Tamm
7-15-83

CONSTRUCTION OPERATION TRAVELER 18-1198

1 TRAVELER NO. 2253-0215-7404	2 EQUIPMENT NO. CPI-EIPRCI-10	3 UNIT NO.	4 QUANTITY	5 PAGE 1 OF 1
6 ACTIVITY DESCRIPTION GE BLOCKS AND FUSES		7 REFERENCE DRAWINGS SEE NOTE 1.		
8 SPEC. PROC. ENG. INSTR. MS-605	9 LOCATION CONTROL ROOM EL. 830'0"	10 SYSTEM 7404		
PREPARED BY <u>Forster</u> DATE <u>2/14/83</u>		DEPT. ELECTRICAL ENGINEERING		
REVIEWED BY <u>Charlie Townsend</u> DATE <u>2/14/83</u>				
ANI REVIEW <u>N/A</u> DATE				

INFORMATION
COPY
PPRV

OP NO. DEPT. OPERATION

- NOTE 1: (1) Reliance Dwg. M-99AX103-F
Modified by DCA 16,094 Rev. 1 & 16,104
Sht. 3 Rev. 3
Sht. 4 Rev. 3.
(11) Gibbs & Hill Dwg. 2323-E1-0137 Rev. 3 modified
by DCA 16,213.

- 1 ELET Pick up 12 double-pole fuse blocks GE type 8421-3 and 24 Buss
fuses type NON 3 purchased against CPF # 8960 from NON-Q Rack -
2 in warehouse 'C'.
- 2 ELECT Install fuse blocks & fuses (obtained from OP # 1) on AC & DC
fuse panel on the back of rack CPI-EIPRCI-10 temporarily for test-
ing purpose only. WIV 7/15/83
- ~~3 ELET Pick up 12 double-pole fuse blocks GE type 8421-3 and 24 Buss
fuses type NON 3 from warehouse 'C', material received per
requisition no. R 17406. WIV 7/15/83~~
- ~~4 ELET Remove fuse blocks and fuses installed in OP. No. 2. WIV 7/15/83~~
- ~~5 ELET Install fuse blocks and fuses (obtained from OP #3) for
permanent installation. WIV 7/15/83~~

Upon completion of work, return traveler to Electrical Engineer-
ing Department. Attention: S. Ahmad.

Upon completion of engineering review, forward to Q.E.

REV A ISSUED TO DELETE STEPS 3, 4 & 5. THESE STEPS HAVE BEEN
SUPERSEDED BY TRAVELER 18-83-0451-7404.
Will Vogelberg 7/15/83
Charlie Townsend
7-15-83

CONSTRUCTION OPERATION TRAVELER 12-195

TRAVELER NO. EE83-0450-7404	EQUIPMENT NO. CP1-EIPRCI-09	UNIT NO.	QUANTITY	PAGE 1 OF 1
ACTIVITY DESCRIPTION DC Power Supply To Core Cooling Monitor		REFERENCE DRAWINGS See NOTE 1		
SPE. PROC/ENG. INSTR. MS-605	LOCATION Control Room, Fl. 820'-0"	SYSTEM 7404		
PREPARED BY <u>V. H. H. H. H.</u>	DATE <u>5-10-73</u>	DEPT. Electrical Engineering		
REVIEWED BY <u>V. H. H. H. H.</u>	DATE <u>6/7/73</u>			
ANI REVIEW	DATE			

CP NO. DEPT. OPERATION

CAV. CC
CONSTR. ENG. ANI

- NOTE 1: (i) Exo Sensors Drawing modified by DCA # 17,398
112D003 Sht. 2 of 2, Rev. C (CPF-14535)
- (ii) Gibbs & Hill Drawing modified by DCA # 16,084 Rev. 2
2323-E1-0080 Sht. 7, Rev. 14
2323-E1-0080 Sht. 8, Rev. 12
2323-E1-0136 Rev. 3
2323-E1-0137 Rev. 3
- (iii) Gibbs & Hill Drawing modified by DCA # 16,132 Rev. 1
2323-E1-0076-41, Rev. 8

INFORMATION
COPY
PPRV

- 1 Elect Pick up 13 double-pole fuse blocks and 26 fuses procured under field requisition No. R17486 from QA Rack-2-C in Warehouse "A".
ELECT SC(V)
- 2 Elect Install one fuse block and two fuses (obtain from Op. No. 1) on DC fuse panel on back of rack CP1-EIPRCI-09 and complete the wiring as per DCA #16,084 Rev. 2 and 17,398.
ELECT SC(V)
- 3 Elect Disconnect the wiring from existing AC and DC fuse panels and remove fuses and fuse blocks.
ELECT SC(V)
- 4 Elect Replace the fuses and fuse blocks for AC and DC fuse panels obtained from Op. No. 1 and complete the wiring.
ELECT SC(V)
- 5 Elect Return the fuse blocks and fuses removed under Op. No. 3 to warehouse, non-IE storage.
ELECT SC(V)

Upon completion of work, return traveler to Electrical Engineering Department, ATTENTION: Ijaz Ahmad.
ELECT. G. J. H. IN ACCORD WITH: G. J. H. 3 3/4 LINES REMAIN
Upon completion of review, forward to J.E.

Robert Brown
7/14/73 7-14-73

Robert Brown
7/14/73 7-14-73

Robert Brown
7/14/73 7-14-73

Robert Brown
7/14/73 7-14-73

Robert Brown
7/14/73 7-14-73

CONSTRUCTION OPERATION TRAVELER 15-4198

① TRAVELER NO. EEB3-0451-7404	② EQUIPMENT NO. CP1-EIPRCI-10	③ UNIT NO. 1	④ QUANTITY 1	⑤ PAGE 1 of 1
⑥ DESCRIPTION DC Power Supply To Core Cooling Monitor		⑦ REFERENCE DRAWINGS See Note 1		
⑧ SPEC. PROC. ENG. INSTR. MS-605	⑨ LOCATION Control Room, EL. 830'-0"	⑩ SYSTEM 7404		
PREPARED BY <i>W. H. Chhokar</i>	DATE 5-20-53	DEPT. Electrical Engineering		
REVIEWED BY <i>R. M. Smith</i>	DATE 6/3/53			
AND REVIEW	DATE			

CA/CG
CONSTR. ENG. AND

CP NO. DEPT. OPERATION

NOTE 1: (i) Exo Sensors Drawing modified by DCA #17,398
112D003 Sht. 2 of 2, Rev. C(CPF-14535)

(ii) Gibbs & Hill Drawing modified by DCA #16,084
Rev. 2

2323-EI-0080 Sht. 7, Rev. 14

2323-EI-0080 Sht. 8, Rev. 12

2323-EI-0136 Rev. 3

2323-EI-0137 Rev. 3

(iii) Gibbs & Hill Drawing modified by DCA #15,132
Rev. 1

2323-EI-0076-41, Rev. 8

INFORMATION
COPY
PPRV

- 1 Elect *Elect*
DC (V) Pick up 13 double-pole fuse blocks and 26 fuses procured under field requisition No. R17486 from QA Rack-2-C in Warehouse "A".
- 2 Elect *Elect*
DC (V) Install one fuse block and two fuses (obtained from Op. No. 1) on DC fuse panel on back of rack CP1-EIPRCI-10 and complete the wiring as per DCA #16,084 Rev. 2 and 17,398.
- 3 Elect *Elect*
DC (V) Disconnect the wiring from existing AC and DC fuse panels and remove fuses and fuse blocks.
- 4 Elect *Elect*
DC (V) Replace the fuses and fuse blocks for AC and DC fuse panels, obtained from Op. No. 1 and complete the wiring.
- 5 Elect *Elect*
DC (V) Return the fuse blocks and fuses removed under Op. No. 3 to warehouse, non-IE storage.

Upon completion of work, return traveler to Electrical Engineering Department, ATTENTION: Ijaz Ahmad.

Upon completion of Engineering review, forward to Q.E.

Elect. Qe Insp in Accord. with: SCS 11.338 Limit Review
W. H. Chhokar

Robert J. Brown
7-15-53 7-15-53

Robert J. Brown
7-15-53 7-15-53

Robert J. Brown
7-15-53 7-15-53

Robert J. Brown
7-15-53 7-15-53

Robert J. Brown
7-15-53 7-15-53

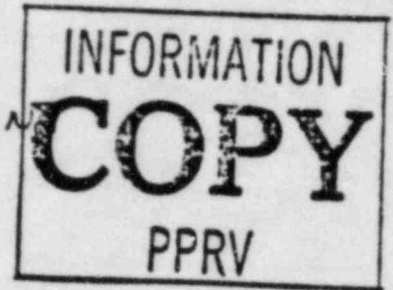
Ijaz Ahmad
7-21-53

UNIT	STRUCTURE/SYSTEM	ITEM/COMPONENT	TAG/ID NUMBER	LOCATION OR ELEVATION	RIR NO
1	Aux 74	Control Panel	CP1-EIPRT-10	Room 135 830	NA

NONCONFORMING CONDITION

REPORTING PERSONNEL

SEE ATTACHMENT



REFERENCE DOCUMENT: CP-CPM 8.1 / ANSI 45.2 REV 1/1971 PARA 3.4/14

REPORTED BY: [Signature] DATE: 9.9.83

QE

QE REVIEW/APPROVAL: [Signature] DATE: 7.12.83
ACTION ADDRESSEE: Poppoell DEPARTMENT: Engineering

DISPOSITION: REWORK _____ REPAIR _____ USE AS IS XX SCRAP _____

ACTION ADDRESSEE

See attachment

QA RECORD I

RTN.	QA REVIEW
	<u>7A6 104-8</u>
FILE NO.	
SUBFILE NO.	

ARMS INDEXED

ENG. REVIEW/APPROVAL: [Signature] DATE: 10.25.83

QE REVIEW APPROVAL: [Signature] DATE: 10.25.83

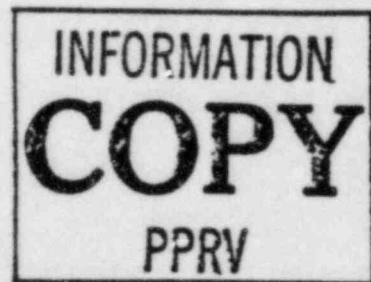
DISPOSITION/VERIFICATION & CLOSURE: [Signature] DATE: 10.28.83

COMMENTS: R.1 TO FULLY EXPLAIN FOREMAN'S POSITION AND DOCUMENTATION INVOLVED
HOLD TAG REMOVED. In Jcynt 10.26.83

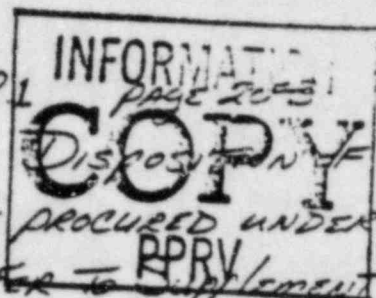
Disposition of NCR E-83-02194S R-1

USE AS IS XXX

1. The disposition of NCR E-83-02194S not referring to the Supplement Number and Item Number for the Craft to "draw" the terminal block is acceptable and not a nonconforming item. Use as is.
2. Non-Q Buchanan 0211 Terminal Blocks have not been purchased from Reliance Electric Company. Use as is.
3. The only Buchanan 0211 Terminal Blocks stored in the Control Room are the Reliance Electric Company furnished ones. The Buchanan 0211 Terminal Blocks are readily identifiable and cannot be confused with a terminal block by "various Manufacturers, Types, and styles". Use as is.
4. The inspection being conducted for NCR E-83-02194S is one of verification. These can be considered bulk items therefore, specified intended use (i.e. CP1-EIPRCI-10 damaged terminal block replacement) is not required. Use as is.



NCR E83-023885 R1

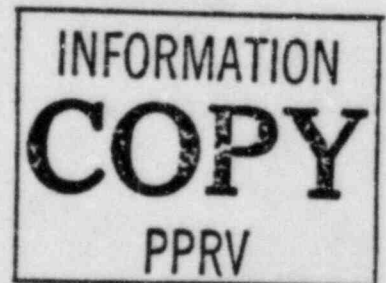


While working NCR E83-021945. NCR SAYS TO INSTALL TERMINAL Block PROCURED UNDER CP-605, DISPOSITION DOES NOT REFER TO SUPPLEMENT NUMBER, ITEM NUMBER, IN WHICH TERMINAL Block WAS TO BE DRAWN. FOREMAN'S DOCUMENTATION WAS NOT SATISFACTORY TO IDENTIFY IF TERMINAL Block WAS IN FACT PROCURED UNDER CP-605. AS Q MATERIAL. MR 140957 FOR MATERIAL ON MRR CP-9453 AND RIR 16320 WAS FOR INITIAL RECEIPT OF MATERIAL FOR RELIANCE EQUIPMENT DATED 6-11-81. MANY PURCHASE ORDERS HAVE BEEN PROCESSED FOR CP-605 SINCE CP-9453, PROCURING Q AND NON-Q MATERIAL. THERE IS NO MEANS TO DETERMINE IF IN FACT TERMINAL Block INSTALLED IS Q-MATERIAL OR IF IN FACT TERMINAL Block WAS ORIGINALLY RECEIVED ON MR 140957. TERMINAL Blocks ARE NOT IDENTIFIED TO REFLECT Q OR NON-Q QUALIFICATION. PER CP-CPMB.1 REV.-1 PARA 3.4 THE APPLICABLE INFORMATION REQUIRED ON THE MATERIAL REQUISITION IS SELF-EXPLANATORY. AS A MINIMUM, IT SHOULD INCLUDE ENOUGH INFORMATION TO PROVIDE TRACEABILITY OF THE ITEM AND SHOULD INCLUDE THE PURCHASE ORDER NUMBER EXCEPT WHEN REQUISITIONING EXPENDABLE CONSTRUCTION MATERIAL AND BULK ITEMS. SUCH AS PIPE, PIPE FITTINGS, PIPE HANGERS, PIPE SPOOLS, FLOOR DRAINS, GASKETS, NUTS, BOLT STUDS, WASHERS, LEAD, ETC... TYPICAL INFORMATION REQUIRED IS (A) ITEM DESCRIPTION, (B) ITEM IDENTIFICATION, (C) QUANTITY, (D) INTENDED USE. THE LISTED INFORMATION WILL BE

USED AS A MEANS OF PROVIDING TRACEABILITY OF ITEMS, AND ENSURING THEIR USE WHERE INTENDED OR ACCEPTABLE. WHERE REQUIRED, THE QC-SIGNED MR SHALL BE PRESENTED TO THE QC FIELD INSPECTOR BEFORE THE ITEM IS INSTALLED SO THAT THE INSPECTOR MAY VERIFY THE ACCEPTABILITY OF THE ITEM FOR THE INTENDED USE. DEVIATIONS TO THE SPECIFIED INTENDED USE WILL BE PERMITTED IF VERIFIED AS ACCEPTABLE BY Q.C." TERMINAL BLOCKS ARE ISSUED FROM VARIOUS STORAGE AREAS ON SITE. NON-Q AND Q TERMINAL BLOCKS BY VARIOUS MANUFACTURERS, TYPES, AND STYLES ARE STORED IN SAME STORAGE AREAS ¹⁸⁹⁻¹⁸³ ~~(SOME)~~ WITH NO PHYSICAL IDENTIFICATION TO IDENTIFY PARTS AS Q OR NON-Q. PER ANSI N45.2. PARA 14 "SPECIAL ATTENTION SHALL BE GIVEN TO PROVIDING ADEQUATE INSTRUCTIONS FOR MARKING AND LABELING FOR PACKAGING, SHIPMENT, AND STORAGE OF ITEMS. MARKING SHALL BE ADEQUATE TO IDENTIFY, MAINTAIN, AND PRESERVE THE SHIPMENT, INCLUDING INDICATION OF THE PRESENCE OF SPECIAL ENVIRONMENTS OR THE NEED FOR SPECIAL CONTROL."

1 Hold Tag Applied

ALL OTHER UNRELATED WORK MAY CONTINUE.



TEXAS UTILITIES
GENERATING CO

COMANCHE PEAK STEAM ELECTRIC STATION
NONCONFORMANCE REPORT (NCR)

NCR No
E83-023555

PAGE 1 OF 3

UNIT	STRUCTURE/SYSTEM	ITEM/COMPONENT	TAG/ID NUMBER	LOCATION OR ELEVATION	RIR NO
1	Aut 74	Control Panel	CP1-FIPRCED	Room E30 135 E30	N/A

NONCONFORMING CONDITION

SEE ATTACHMENT

REFERENCE DOCUMENT: CP-CPM E.1 / ANSI 452 REV 1/1971 PARA 3.4/14

REPORTED BY: [Signature] DATE: 8/3/83

QE REVIEW/APPROVAL: [Signature] DATE: 9/8/83

ACTION ADDRESSEE: Popplewell DEPARTMENT: Engineering

DISPOSITION: REWORK _____ REPAIR _____ USE AS IS _____ SCRAP _____

INFORMATION
COPY
PPRV

ENG. REVIEW/APPROVAL _____ DATE: / /

QE REVIEW APPROVAL: _____ DATE: / /

DISPOSITION VERIFICATION & CLOSURE: _____ DATE: / /

COMMENTS: As 9-9-83
R.I To Fully explain Foreman's Position and Documentation involved

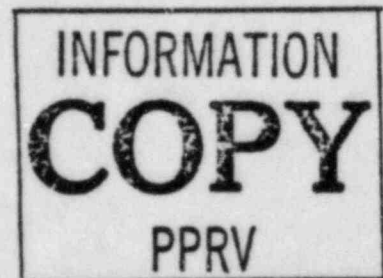
While working NCR E83-021945. Disposition of NCR SAYS TO INSTALL TERMINAL BLOCK PROCURED UNDER CP-605, Disposition Does NOT Refer To Supplement Number, Item Number, in which Terminal Block was to be drawn. Foreman would not supply proper documentation to identify Terminal Block was in fact procured under CP-605. CP-605 procurement is of Q and Non-Q material. Terminal blocks are not identified to reflect Q or Non-Q Qualification. Per CP-CPM E.1 Rev.1 Para 3.4. "The Applicable information required on the Material Requisition is self-explanatory. As a minimum, it should include enough information to provide traceability of the item and should include the purchase order number except when requisitioning expendable construction material and bulk items such as pipe pipe fittings, pipe hangers, pipe spools, floor drains, gaskets, nuts, bolts studs, washers, lead, etc. Typical information required is: (A) item description, (B) item identification, (C) quantity, (D) intended use. The listed information will be used as a means of providing traceability of items, and ensuring their use where intended or acceptable. Where required, the QC-Signed MR shall be presented to the QC Field Inspector before the item is installed so that the inspector may verify the acceptability of the item for the intended use. Deviations to the specified intended use will be permitted

INFORMATION
COPY
PPRV

IF VERIFIED AS ACCEPTABLE BY QC. THESE ⁸⁸⁻³¹⁴³ ~~TERMINAL~~ BLOCKS ARE ISSUED FROM FIELD ELECTRICAL TOOL ROOM. NON-Q AND Q TERMINAL BLOCKS BY VARIOUS MANUFACTURERS, TYPES, AND STYLES ARE STORED IN SAME STORAGE AREA WITH NO PHYSICAL IDENTIFICATION TO IDENTIFY PARTS AS Q OR NON-Q. PER ANSI N45.2. PARA 14 "SPECIAL ATTENTION SHALL BE GIVEN TO PROVIDING ADEQUATE INSTRUCTIONS FOR MARKING AND LABELING FOR PACKAGING, SHIPMENT, AND STORAGE OF ITEMS. MARKING SHALL BE ADEQUATE TO IDENTIFY, MAINTAIN, AND PRESERVE THE SHIPMENT, INCLUDING INDICATION OF THE PRESENCE OF SPECIAL ENVIRONMENTS OR THE NEED FOR SPECIAL CONTROL."

1 Hold Tag Applied

ALL OTHER UNRELATED WORK MAY CONTINUE.



1 [REDACTED] The foreman's name was [REDACTED]

2 MR. WESSMAN: Does he still work out there?

3 [REDACTED] Yes, sir; he works for Tugco.

4 MR. WESSMAN: If we went and asked him about this, he'd
5 know who told us, of course.

6 [REDACTED] Yes, sir.

7 MR. WESSMAN: I'm not sure I want to do that.

8 [REDACTED] I don't know if he could tell you even
9 right now who it was that brought it over. I can picture
10 two people in my mind: One I can name; the other I can't
11 remember his name. He hasn't been out there in a little over
12 two years, and I really didn't know him that well at the time. 7a

13 MR. WESSMAN: If we went and asked this [REDACTED]
14 about repairs to the solenoid, would that be likely to reveal
15 your identity, or would you prefer that we not go ask him?

16 [REDACTED] It would reveal my identity; I don't really
17 have any problem with it.

18 MR. WESSMAN: Let us consider it. We'll consider this
19 one; we're going to consider the other two issues. I think
20 we have some additional evaluation, and we know we're going
21 to talk to you on that. Now, you said you had some other
22 comments on fuse blocks. Let's go briefly on those then. 7b

23 [REDACTED] My main issue was in the control room. We
24 have non-Q fuse blocks on site, and we also have Q fuse
25 blocks. Between the two, there's no way to identify them.

1 Per requirements of ES100, we are bound to have traceability
2 on all material installed in Q equipment. On-site fuse
3 blocks are--at that period of time we had a building we
4 called our non-Q shack. It had spare non-Q equipment in it,
5 inasmuch as fuse blocks, breakers, terminal blocks, just
6 various and sundry types of spare parts. We also had Q
7 shack which we stored all of our Q and safety-related
8 terminal blocks and fuse blocks in. We were in the process
9 of installing a fuse block in CIO 9 and 10 in the Control
10 Room--

11 MR. WESSMAN: I'm sorry; CI--?

12 [REDACTED] Yes, sir. It's the last numbers of the
13 actual spin number. I can't actually recall the whole spin
14 number.

15 MR. WESSMAN: Is it a cabinet number? Do you know--

16 MR. JOHNSON: Westinghouse? Or are we talking about
17 main control panels?

18 [REDACTED] They're not main control panels. These,
19 I believe, are in the detection panels. These are manu-
20 factured cabinets to process the microprocessors, to contain
21 the microprocessors in the Control Room. Those blocks
22 installed I had a question on inasmuch as whether they were
23 actually Q or non-Q per the requirements. We were not
24 provided paperwork other than the general CPO number or the
25 actual generalized sheet as far as the actual purchase order

AGE-35

1 sheet to justify the actual part. Like I say, there was
2 no physical way that you can identify the two between, yet
3 if we're bound to have traceability, why come up with the
4 same sheet and say it's off of this? There's no way I can
5 say it's definitely off of this. Since then, we've gone into
6 a material receipt-type form whereas we have material receipt
7 forms as they're issued from the Q shacks at this time, but--

8 MR. WESSMAN: So now there is traceability as far as
9 Q or non-Q--

10 [REDACTED] Right. But at that period of time there
11 was a question as far as--inasmuch as we're bound to require-
12 ments, yet when you try and force the issue as from the QC
13 standpoint or try to take a stand on it is--we were always
14 given a general decline or whatever, as far as electrical
15 engineering; well, it's on this CPO, yet we had no other
16 documentation to prove it. A person could have gone down
17 to the non-Q shack and gotten it out of there.

18 MR. WESSMAN: So there could be Q and non-Q blocks
19 mixed in these cabinets--what?--only in the Control Room,
20 as far as you know?

21 [REDACTED] That was only one possibility. It was
22 just the fact that they would not supply us with an MR.

23 MR. WESSMAN: I think when you raised this concern, you
24 tied it to Order MS605. Is this the only order that you're
25 aware of?

AQE-35

7a

1 [REDACTED] That was primarily the purchase order
2 utilized in the Control Room. It's under Reliance, as far
3 as Reliance-supplied equipment.

4 MR. JOHNSON: Did Reliance manufacture these detection
5 cabinets? Were they the vendor?

6 [REDACTED] The cabinets: I'm not for sure who they
7 were manufactured by. Now, what they had done is they
8 issued a DCA to say that these cabinets indeed filed up under
9 Purchase Order CPO605, as--there are several other cabinets
10 in the Control Room. This purchase order, I went back and
11 reviewed it at the Warehouse A in Records Receiving there.
12 I had identified it to where they had actually ordered non-
13 Q fuse blocks and Q fuse blocks of the same type on the same
14 purchase order. I was given the statement by Electrical
15 Engineering that all the fuse blocks were Q or safety related
16 to order.

7c
APE-35

17 MR. WESSMAN: Would you know that NCR number? Is that
18 one that you could find?

19 [REDACTED] Yes, sir, I can find that.

20 MR. WESSMAN: I want you to find that one for us. I
21 think we need to go back and look specifically at each of
22 these. As far as you know, we didn't look at any specific
23 NCR on that, Al?

24 MR. JOHNSON: We did look at a sample of NCR's for--

25 MR. WESSMAN: Okay, but we don't know whether our

1 sample included this particular--

2 MR. JOHNSON: I can't answer that question because I
3 don't know what the number is.

4 MR. WESSMAN: I understand. So we don't know; we need
5 that specific number from you. PQE-35

6 [REDACTED] Okay.

7 MR. WESSMAN: Anything else on those fuse blocks? Al,
8 do you have any other questions on the fuse blocks?

9 MR. JOHNSON: Just one question. I'd like to know when
10 you say that the Q and the non-Q fuse blocks--they were
11 stored together?

12 [REDACTED] No, sir, they were not stored together.
13 They were in different buildings. The non-Q storage build-
14 ing was accessible by all. The Q storage building was
15 through a window-type delivery system. At that period of
16 time there was no material receipts issued on the equipment
17 drawn from there. You could take a traveler or other
18 documentation as far as an NCR, and go up to the window and
19 say I need this particular part and they would give it to
20 you, no questions asked.

21 MR. JOHNSON: I see. I have no other questions. 7c

22 MR. WESSMAN: Do you have anything else you want to add
23 while we're on the record?

24 [REDACTED] Not really.

25 MR. WESSMAN: Let me share a couple of things with you

1/31/85

Allegation Task No. AQE-37

Allegation Category: Electrical and Instrumentation 5, Electrical Nonconformance Report (NCR) Activities

Allegation Number: AQE-1, AQE-2, AQE-3, AQE-4, AQE-5, AQE-25, AQE-33, AQE-34, AQE-35, AQE-37, AQE-38, AQE-40, AQE-41, AQE-42, AQE-45, AQE-47, AQE-48, AE-24, and parts of AE-22, AE-27, AQE-12, AQE-36 and AE-50.

Characterization: It is alleged that the validity of the generation and disposition of electrical nonconformance reports (NCRs) was suspect.

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J49

Assessment of Safety Significance: The implied safety significance of these allegations is that the quality of the electrical installation could be indeterminate.

In addition to these general concerns, several allegations contained specific information about questionable NCR dispositions, which includes:

- Disposition of NCR on terminal block rework was questionable (AQE-37).

SSER-7
J50

To address the specific technical concerns raised in the above allegations, the TRT examined the NCR log books, interviewed alleged, and selected a random sample of NCRs pertaining to specific items of concern. The TRT determined that:

- The allegations of improper documentation of cable removal (AQE-1 and AQE-2); repair rather than replacement of flex conduit (AQE-3); damaged cable as a result of a fallen cable tray (AQ-24); failure to follow procedures and specifications (AQE-25 and AQE-40); damaged cable due to inadequate thread engagement on a conduit (AQE-45); and rework of terminal blocks (AQE-37) could not be substantiated, since in its review of a random sample of 75 NCRs on these issues the TRT could not identify any inconsistencies or deficiencies that would raise a safety question. These findings were discussed with some of the individuals responsible for raising these concerns, one of whom disagreed with the TRT determination concerning AQE-37 and provided additional information. The TRT is currently evaluating this new information and will report the results in a supplement to this SSER.

SSER-7
J52

FOIA-85-59

D/396

1/31/85

AQE-37 (continued)

Conclusions and Staff Positions: Based on the reviews of the pertinent documentation, examination of NCRs, and the information obtained from the interviews, the TRT concludes that adequate procedures, controls, and process checks exist for the generation and disposition of reported items of nonconformance as related to the concerns raised by the above allegations. The TRT also concludes that of the allegations identified at the outset of this section, only a few specific instances were found which raised questions concerning the adequacy of safety-related items. These are discussed above and are discussed further in other sections of the report.

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J 52

The results of this evaluation will be further assessed as part of the overall programmatic review of all NCRs addressed under QA/QC Category 5, "Nonconformance Reports," and under QA/QC Category 6, "QC Inspection." Therefore, the final acceptability of this evaluation will be predicated on the satisfactory result of the overall programmatic review on these subjects. Any adjustments to these conclusions will be reported in a supplement to this SSER. The results of the TRT review of new information concerning allegations AQE-34, AQE-35 and AQE-37 will also be reported in a supplement to this SSER.

REFERENCE DOCUMENTS:

1. NCR No. E83-03239, 12/14/83 — Attached 7c
2. Testimony: Allegor [REDACTED], Oct 30, 1984
Grassbury, TX — Pages 26-30 — Attached
3. Startup Administrative Procedure CP-SAP-6,
Rev 9, Page 3 and 4. — Attached

1/31/85

AQE-37 (continued)

REVIEWERS COMMENTS:

The allegor in his testimony maintained that conflict of procedures existed governing the replacement and repair of a broken terminal block at a motor control center in the auxiliary building Unit 1. The allegor maintained that this work activity should have been controlled under BER procedure no. CP-CPM 6.10 which requires an Item Removal Notice (IRM) irrespective whether verification by subsequent startup testing by personnel occurs. No IRM was issued at the time as the work activity was governed under ^{startup} procedure CP-SAP-6 under paragraphs 3.1 in which a startup work Permit (SWP) was authorized.

1/31/85

AQE-37 (continued)

4 The two NCRs, and six page RFIC, and startup procedure CP-SAP-6, concerning the original allegation, were examined and by a TRT reviewer and reported in the SSER-7 (Page J58), in that disposition of NCRs regarding terminal logic rework that were questionable, could not be substantiated. The additional information submitted (NCR EB3-03239 and the alleged's testimony - attached) is what is ~~to be~~ evaluated in this SSER as follows:

4 NCR EB3-03239 has been dispositioned properly in that the work activity concerned by the alleged is appropriately governed under startup procedure CP-SAP-6 paragraphs 3.1 and 4.1.2 in particular. Procedure CP-SAP-6 directs an IRN to be issued, in accordance with B&R procedure CP-CPM 6.10-1, only if a subsequent verification is not to be performed by startup testing personnel, to ensure reinspection.

1/31/95

AQE-37 (continued)

The TRT concludes, after examination of the pertinent NCR, CPSES startup administrative procedures, SAR construction procedures, documentation, and all others, testimony, that adequate controls, and process checks existed for the disposition of reported items of nonconformance as related to the concerns raised by the above allegation.

Action Required : None

PAGE 1 OF 2

UNIT	STRUCTURE SYSTEM	ITEM/COMPONENT	TAG/ID NUMBER	LOCATION OR ELEVATION	RIR NO.
1	Aux	CONFLICTING DOCUMENTATION	CP-CPM 6.10 CP-SAP-6	N/A	N/A

NONCONFORMING CONDITION

CP-CPM 6.10 "Item Removal Notice Procedure"
CP-SAP-6 "Control of Work on Station Components after
release from Construction to TUGCO"

SEE ATTACHED

INFORMATION
COPY
PPRV

REFERENCE DOCUMENT: CP-CPM-6.10 / CP-SAP 6 REV 10/9 PARA SEE ATTACHED

REPORTED BY: Jim CREEK DATE: 12/13/83

QE REVIEW/APPROVAL: [Signature] DATE: 12/13/83
ACTION ADDRESSEE: Pat Clark DEPARTMENT:

DISPOSITION: REWORK _____ REPAIR _____ USE AS IS XX SCRAP _____

No procedure violation exists as the work was performed under the direction of Startup, and Startup is not responsible for the implementation of B&R procedures. CPM 6.10 does not apply to work performed under Startup's direction.

ARMS
INDEXED

QA RECORD

RTN.	QA REVIEW
L	CH 12/14/83
FILE NO.	15.1
SUBFILE NO.	E-83-03239

DATE:

ENG. REVIEW/APPROVAL: [Signature] DATE: 12/14/83

QE REVIEW/APPROVAL: [Signature] DATE: 12/14/83

DISPOSITION VERIFICATION & CLOSURE: [Signature] DATE: 12/14/83

COMMENTS: Jim Creek: Hold TAG REMOVED 12-14-83
HQ117

REPORTING PERSONNEL

QE

ACTION ADDRESSEE

JE

CP-SAP-6 REV 9 PARA 3.1 "STARTUP WORK

PERMIT - DOCUMENT ORIGINATED BY TUGLO
STARTUP THAT SPECIFY STEP-BY-STEP INSTRUCTION
FOR IMPLEMENTING WORK AND IDENTIFY INSPECTION,
RETEST AND SAFETY REQUIREMENTS. ISSUANCE OF A
SWP AUTHORIZES THE SPECIFIC WORK TO BE PERFORMED

CP-SAP-6 REV 9 PARA 4.1.2 - "IF A QUALITY
CHARACTERISTIC OF A COMPONENT OR SYSTEM
WILL BE BREACHED BY WORK TO BE PERFORMED
AND THE QUALITY CHARACTERISTIC WILL NOT BE
VERIFIED BY SUBSEQUENT STARTUP TESTING,
REINSPECTION WILL BE ENSURED BY ISSUING AN
INSPECTED ITEM REMOVAL NOTICE (IRN) PER
B&R PROCEDURE CP-CPM 6.10-1, A SWP
OR MAR IN ACCORDANCE WITH THIS PROCEDURE."

CP-CPM 6.10 REV 10 PARA 2.2.d (NOTE)

"AN IRN IS REQUIRED EVEN WHEN
A SWA OR SWP HAS BEEN ISSUED.

A CONFLICT EXIST BETWEEN CP-SAP-6 REV 9
AND CP-CPM-6.10 REV 10. CP-SAP 6 DOES
NOT REQUIRE AN IRN TO BE ISSUED IF SYSTEM
RETEST WILL BE ACCOMPLISHED. CP-CPM STATES
THAT AN IRN IS REQUIRED EVEN IF INFORMATION SWP
OR SWA.

INFORMATION SWP
COPY
PPRV

CONTROL OF WORK ON STATION COMPONENTS
AFTER RELEASE FROM CONSTRUCTION TO TUGCO

1.0 PURPOSE

The purpose of this procedure is to establish the methods to be used by TUGCO to;

- 1.1 Authorize work to be performed on structures, systems and/or components after custody has been transferred to TUGCO per CP-SAP-3;
- 1.2 Ensure that adequate safety precautions have been taken prior to work being performed;
- 1.3 Identify required retesting; and
- 1.4 Document satisfactory completion of work authorized and associated retesting.

2.0 APPLICABILITY

The requirements of this procedure apply to work performed on station components after custody has been transferred from construction to TUGCO Startup. If custody of components or systems is to be returned to a contractor for performance of work, the requirements of CP-SAP-3 shall apply in lieu of this procedure.

3.0 DEFINITIONS

- 3.1 Startup Work Permit (SWP) - Document originated by TUGCO Startup that specify step-by-step instruction for implementing work and identify inspection, retest and safety requirements. Issuance of a SWP authorizes the specified work to be performed.
- 3.2 Startup Work Authorization (SWA) - Document that may be originated by B&R to request authorization to perform work or by TUGCO Startup to authorize work.
- 3.3 Maintenance Action Request (MAR) - A standard TUGCO document used to initiate, control and document maintenance work and inspections which must be performed on station equipment by TUGCO personnel.

4.0 PROCEDURE

4.1 GENERAL REQUIREMENTS

- 4.1.1 The System Test Engineer (STE) will be responsible for processing SWP's, SWA's and MAR's in accordance with this procedure and to monitor and coordinate the associated work activities, including requests for vendor assistance, equipment operation and placement of safety tags to get the work completed.

FOR INFORMATION ONLY

Notes

- (1) A SWP should generally be used when the work activity is initiated by startup personnel and there are no existing Engineering/Construction procedures that can be used to implement the work.
- (2) A SWA should generally be used when a system/component clearance (safety tag) and retesting is required after the work is complete. All work authorized to be performed by a SWA will be performed in accordance with normal construction and inspection procedures.

4.1.2 If a quality characteristic of a component or system will be breached by work to be performed and the quality characteristic will not be verified by subsequent startup testing, reinspection will be ensured by issuing an Inspected Item Removal Notice (IRN) per B&R procedure CP-CPM 6.10-1, a SWP or MAR in accordance with this procedure.

4.1.3 To assure adequate work control and material traceability, a SWP or a MAR will be processed in accordance with this procedure when the following types of work are initiated by TUGCO Startup:

Notes

- (1) The instructions on the back of the traveler form are not applicable.
- (2) If the work can be performed and documented in accordance with normal engineering or construction procedures it is NOT mandatory for a SWP or a MAR to be issued also. However, a SWA may be required to authorize the work and/or document required retests.

FOR INFORMATION ONLY

1 [REDACTED] I would imagine the Bisco seal is back in.

2 MR. JOHNSON: Is this an area where the post-construction
3 procedure has been implemented and the building management
4 organization having turned this over? AQE-3A

5 [REDACTED] Yes, sir.

6 MR. WESSMAN: Let's go off the record for a moment.

7 (A discussion was held off the record.)

8 MR. WESSMAN: While we were off the record, we explored
9 a little more fully the details of IE Notice No. 84-47. It
10 turns out we were in error when we said earlier that this
11 IE Notice was in part contributed to one of the concerns
12 raised by [REDACTED] Though the IE Notice concerns
13 terminal blocks, there is no relationship between this par-
14 ticular IE Notice and any of the concerns on the terminal
15 blocks that were raised by [REDACTED] While we were off the
16 record, we also discussed AQE 37 which concerns a paperwork
17 conflict regarding rework of terminal blocks. So we have
18 our notes correct, would you tell us a little bit more about
19 that one, if you could, [REDACTED] and what you found, so we can
20 explore that one a little more fully. AQE-37

21 [REDACTED] What we had was a case where we had a
22 broken terminal block in the motor control center. There
23 was an NCR that was written on the terminal block and what
24 we were going to do in actuality to correct the problem.
25 The start-up engineer had issued a Z series traveler. It's

1 a traveler produced by Start-up, not Electrical Engineering.
2 In accordance with the regular electrical procedures, we had
3 to have an IRN issued in order to remove fuel-landed cables
4 off the terminal block in order to replace it. It wound up
5 being a forced issue as far as the Start-up did not have to
6 comply with the regular procedures inasmuch as they did not
7 require an IRN to perform their work. SAP 6, which is their
8 procedure as far as related to this type operation actually
9 states that an IRN is required. We were told that this was
10 related only to mechanical problems, not electrical, but yet
11 an example actually given in the SAP 6 is directly--even
12 gives the example as a terminal block which was kind of
13 ironic. We wrote two NCR's and one six- to seven-page RFIC
14 over this incident.

15 MR. WESSMAN: What is an RFIC?

16 [REDACTED] It's a Request for Information Clarification.
17 This was sent to Quality Engineering, based on as far as
18 does Start-up actually abide by our procedures and if not,
19 what other procedures do we inspect by other than the ones
20 we have. The RFIC was answered. I went through and I
21 annotated as far as what actually--just for my own reference--
22 annotated what actually occurred, and the way the thing was
23 answered was pretty erroneous as far as what took place.

24 MR. WESSMAN: Is this RFIC available, or do you know
25 where it is, or is there a serial number or something on it

AOE-37

7c

RECEIVED IN BIRMINGHAM N.Y. 87001 JUNE 1964

1 to where we could get access to it?

2 [REDACTED] Yes, it is. I can also provide you with
3 that.

4 MR. WESSMAN: If you could find out that information or
5 get us a copy and the serial numbers of the two NCR's, that
6 would allow us to look at the entire trail of this activity. AQE-37
7 Would there be other information besides what's in those two
8 documents that we should look at?

9 [REDACTED] I tried to obtain the Z traveler number
10 itself. I was not able to obtain that number as far as on
11 general research. 7c

12 MR. WESSMAN: Do you know how we might find it or who
13 we would ask or--

14 [REDACTED] The only way is possibly tracking back to
15 the terminal block itself and then trying to trace it back
16 from there. I can identify what compartment and what block
17 it is.

18 MR. WESSMAN: Okay. If we have that much, let's see
19 what we can find; and the two NCR's and RFIC; we'll see if
20 we can examine the whole story.

21 [REDACTED] So up to date right now, to my knowledge,
22 the documentation shows that those cables had never been
23 lifted, yet you have a new terminal block there to where you
24 just have a complete blatant violation of procedures. This
25 was a problem, a long-time problem, that we had had with

1 Start-up. This was just on one of the issues that we tried
2 to force with them. We fought it, and we won in a way; we
3 lost in a lot. [REDACTED] at that time had also stated--now,
4 this was through [REDACTED] they worked together on this
5 problem; we went to meetings on this thing for almost a week.
6 [REDACTED] was going to revise SAP 6 to clarify this conflict
7 of documentation we had between the Start-up procedures and
8 the actual construction-quality control procedures. It
9 never was clarified. At that time the NRC agent that we had
10 on site--I forget his name; it was right before [REDACTED]

11 MR. WESSMAN: There were two gentlemen named [REDACTED]
12 and [REDACTED]
13 [REDACTED] [REDACTED] [REDACTED] was also involved on
14 this. After [REDACTED] left the site, this whole subject
15 was dropped.

16 MR. WESSMAN: About what time did this all take place?
17 [REDACTED] That was around November, December of '83.

18 MR. JOHNSON: I was going to ask you if SAP 6 even
19 gives an example of a terminal block which requires an IRN,
20 Item Removal Notice. What did they substitute in lieu of an
21 IRN?

22 [MR. BIELSS:] Nothing.

23 MR. JOHNSON: Okay. You indicated that the broken
24 terminal block was in an NCC. Could you identify which NCC
25 that was? Or a train green or orange?

AQE-37
70

1 [REDACTED] At this time I couldn't honestly say.

2 MR. WESSMAN: But the NCR's would tell us that.

3 [REDACTED] Yes, they will.

4 MR. JOHNSON: I'm just looking for a clue for where to
5 start.

6 MR. WESSMAN: Let's wait until [REDACTED] calls us with the
7 NCR numbers. If you get a chance in the next couple of days
8 to go back, then call us either later this week or the first
9 of next week. We'll give you some phone numbers. You can
10 call us collect and tell us what you're able to find on that,
11 and then we'll quietly go in and do some more inspecting.

12 [REDACTED] Okay.

13 MR. WESSMAN: I think that's the best way to go about it.
14 Okay. Anything else on this issue?

15 MR. JOHNSON: On this particular issue, no.

16 MR. WESSMAN: I think we've covered the concerns that
17 you raised for us back last April and clearly, [REDACTED] we've
18 got two out of the six where you've helped us discover
19 there's some more we can look at.

20 [REDACTED] There's one more.

21 MR. WESSMAN: Okay.

22 [REDACTED] On your solenoid: I'm not really for
23 sure what you have on your writeup for that, as far as what
24 I stated.

25 MR. WESSMAN: We didn't have a lot of detail on that,

AQE-37

7c

AQE-38