

SSER

Task: Allegation A-185

Reference Number: 4-84-A-06-80

Characterization: The allegation is that a written procedure does not exist for joint Mercury/Ebasco review of system turnover documentation.

Assessment of Allegation: The lack of a written procedure may cause an inadequate review of quality-related documentation which could have affected verification of the quality of safety-related systems.

Based upon Significant Construction Deficiency (SCD) No. 57, Ebasco instituted a joint Mercury/Ebasco review of contractor turnover packages. SCD 57 was issued to identify problems with Startup System's (SUS) No's. 59, 60A, B and C. Mercury QA records contained inadequate installation and turnover documentation.

The joint Mercury/Ebasco review of Mercury's turnover documentation was performed at the Mercury facility to eliminate excessive documentation deficiencies at this level rather than at Ebasco's level. Mercury performed turnover documentation review at their facility in accordance with Mercury QC Procedure 3010 (N49720 Suppl) - Quality Assurance Records Control. The review compared the turnover package QA records against project specifications and identified deficiencies and corresponding corrective actions to close these deficiencies. At this point, an Ebasco reviewer would evaluate Mercury's package review for adequacy. Ebasco would either agree, disagree, or add additional deficient-action items. Each action Mercury completed was documented on a Mercury checklist.

A specific, detailed Ebasco procedure was not written for joint Mercury/Ebasco turnover package reviews. However, Ebasco procedure QAI 9A, Rev. 0 dated September 21, 1982, Record Statusing to Support Startup System Turnover, was in effect during joint Ebasco/Mercury reviews. This procedure was generic in nature and provided instruction to delineate guidelines for in-process and status-checking of construction-installation QA records. The procedure included guidelines for responsibilities, for review of records for completeness, for accuracy of content, for proper form, for traceability, and for legibility and authenticity. It also provided forms to document record review with the status (accept/reject) of individual documents within the package, and noted that deficiencies detected during review were to be documented on Form QAI 9.2. On October 8, 1982, Ebasco issued a supplement to QAI 9A (QAIRG No. 15) for Ebasco QAIRG reviewers to evaluate Mercury's turnover packages for Contract W3-NY-15. This procedure delineated the specific documentation, by form number, that Mercury's package should include.

Even though no specific Ebasco/Mercury joint review procedure was in existence, by adhering to Ebasco procedure QAI 9A, and Mercury QC Procedure QCP-3010, joint Ebasco reviewers had adequate procedural guidance to perform and document review activities.

It should also be noted that the Ebasco joint review for other site contractors was performed using the same procedural mechanism as previously described for Mercury.

The NRC staff concludes that this allegation has no safety significance and is not indicative of any adverse generic or management implications.

Potential Violations: None.

Actions Required: None.

References

1. Significant Construction Deficiency 57
2. ASME Section VIII, Nuclear Power Plant Components
3. ANSI N45.2, QA Prog. Req's for Nuclear Facilities
4. Mercury: Mercury QA Manual
PCP-2010, Document Control Procedure
QCP-3010, Rev. 4, Quality Assurance Records Control
5. Ebasco: QAI 9A, Rev. 0, Record Statusing to Support Startup System
Turnover
QAIRGS No. 15, Rev. 0, Documentation Status Review (Mercury
Instrumentation and Controls for Contract No. W3-NY-15)
6. Staff Documentation of Interview with LP&L and Ebasco personnel regarding
Allegation A-185 subject matter.

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