

SSER

Task: Allegations A-07; A-29

Reference No.: 4-83-A-65/3; 4-83-A-81-83

Characterization: The allegation is that EBASCO quality assurance (QA) reviewers are "grooming" paperwork; e.g., having individuals sign documents years after the fact, and not back-dating to indicate a late entry, and that alterations in QA documentation are unauthorized, with no substantiating evidence for changes.

Assessment of Allegation: The implied significance of this allegation is that records of safety-related systems may be inadequate.

The NRC staff evaluated EBASCO's QA records review system and the qualifications of record reviewers, and a sample of QA records was reviewed specifically for unauthorized changes, dates out of sequence, white-out, incorrect data, or appearance of falsification.

The NRC staff found that EBASCO procedures provided guidelines for changes or corrections to documents. Documents were reviewed prior to submittal to record storage. EBASCO records reviewers were trained and qualified, and although problems in training had been encountered, those problems had been corrected.

The NRC staff extensively reviewed documents submitted by various contractors and originally reviewed by EBASCO. One possible falsification of a signature on a nonconformance report (NCR) was observed. Otherwise, no deliberate or obvious falsification of records was noted.

The NRC staff considers the EBASCO records review system and qualifications of record reviewers adequate (see allegation A-06 and A-196). This allegation has neither safety significance nor generic implications.

Potential Violations: None.] 4

Actions Required: None.

References:

1. ANSI N45.2.9, "Requirements for Collection, Storage, and Maintenance of Quality Assurance Records for Nuclear Power Plants."
2. EBASCO Procedure QAI-9, "Review and Handling of Construction-Installation Records."

3. [ Confidential interoffice correspondence to file from H. J. Kunis  
dated April 14, 1983. Subject: Allegations of Document  
Falsification by Mercury Employees. ]<sub>2</sub>
4. Allegation A-33

Statement Prepared By:

David Ross

Date

Reviewed By:

Team Leader

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Approved By:

Task Management

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SSER

*9/2/84*  
Task: Allegations ~~A-007~~; A-029

Reference No.: 4-83-A-65/3; 4-83-A-81-83

Characterization: The allegation is that Ebasco quality assurance (QA) reviewers are "grooming" paperwork; e.g., having individuals sign documents years after the fact, and not back-dating to indicate a late entry, and that alterations in QA documentation are unauthorized, with no substantiating evidence for changes.

Assessment of Allegation: The implied significance of this allegation is that records of safety-related systems may be inadequate.

The NRC staff evaluated Ebasco's QA records review system and the qualifications of record reviewers, and a sample of QA records was reviewed specifically for unauthorized changes, dates out of sequence, white-out, incorrect data, or appearance of falsification.

The NRC staff found that Ebasco procedures provided guidelines for changes or corrections to documents. Documents were reviewed prior to submittal to record storage. Ebasco records reviewers were trained and qualified, and although problems in training had been encountered, those problems had been corrected.

The NRC staff extensively reviewed documents submitted by various contractors and originally reviewed by Ebasco. One possible falsification of a signature on a nonconformance report (NCR) was observed. Otherwise, no deliberate or obvious falsification of records was noted.

The NRC staff considers the Ebasco records review system and qualifications of record reviewers adequate. This allegation has neither safety significance nor generic implications. *(See allegation A-196)*

Potential Violations: None. ] 4

Actions Required: None.

References

1. ANSI N45.2.9, "Requirements for Collection, Storage, and Maintenance of Quality Assurance Records for Nuclear Power Plants."
2. Ebasco Procedure QAI-9, "Review and Handling of Construction-Installation Records."
3. [Confidential interoffice correspondence to file from H. J. Kunis dated April 14, 1983. Subject: Allegations of Document Falsification by Mercury Employees.] 2
4. Allegation A-033

Allegation *Le* A-007; A-029

- 2 -

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