

SSER

Task: Allegation A-136

Reference No.: 4-84-A-06-31

Characterization: The allegation is that it was difficult for EBASCO quality assurance (QA) personnel to get approval to initiate a formal nonconformance report between 1975 and 1977 in the civil-structural area.

Assessment of Allegation: The NRC staff reviewed the procedure for civil-structural nonconformances between 1975-1977. The EBASCO procedure required a nonconformance report (NCR) when, for example, there were physical defects, test failures, incorrect documentation, or deviations from prescribed inspection or test procedures. An NCR was usually created from upgrading a discrepancy notice (DN). Unlike a DN, the NCR required a separate evaluation by a QA engineer to ascertain if it should be upgraded to a reportable item under 10 CFR 50.55(e). The allegor stated that, in the early days of construction, QA reviewers were discouraged from writing NCRs to avoid further independent evaluation of discrepancies or safety violations.

The NRC staff reviewed the allegation and found the following:

1. The EBASCO procedure for writing NCRs has been in existence since September 1975. The first DN was generated in October 1975 by EBASCO civil-structural QA personnel. Therefore, the procedure was available by the time the first DN was written. NCRs were also written in 1975 and 1976, for example, on concrete work associated with the basemat.
2. LP&L has re-evaluated all the concrete packages, soils packages, and structural steel construction packages and found that there is no significant violation of procedures and construction requirements. The NRC staff found no issues in the civil-structural discipline during this period which clearly indicated an NCR should have been written but was not.
3. The NRC staff reviewed sample DNs written between 1975 and 1977 and found none that addressed significant safety issues which were not upgraded to NCRs.

Based on the staff's review of typical DNs and NCRs written in the civil-structural discipline in the 1975-1977 time frame, it appeared that all significant issues were considered against the in-place QA procedures. The difficulty of initiating an NCR was not directly assessed, since the

emphasis was to determine if unresolved safety issues exist. Allegation A-49, A-53, and A-283 address the issue of individuals not being free to write NCR's.

This item had no direct safety significance and there were no facts to suggest a generic problem.

Potential Violations: None.]

Actions Required: None.

References:

1. NCR 5594 and attachments.
2. NCR 6263 (see Allegation A-141).
3. Letter from R. S. Leddick, LP&L to D. G. Eisenhut, NRC, "Docket No. 50-382, Waterford Unit 3 Allegations," April 27, 1984, Item 2.
4. EBASCO Services Inc., Waterford-3 Procedure for Nonconformance Report ASP-III-6, March 5, 1975.
5. J. A. Jones Discrepancy Report, Number 0079 "Concrete Void," June 30, 1976.

Statement Prepared By:

S. B. Kim

_____ Date

Reviewed By:

Team Leader

_____ Date

Reviewed By:

Site Team Leader(s)

_____ Date

Approved By:

Task Management

_____ Date

Document Name:
SSER A-136

Requestor's ID:
CONNIE

Author's Name:

Document Comments:

SSER

Task: Allegation A-136

Reference No.: 4-84-A-06-31

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8/28

Make deletion on page 2
and change to Revision 4.

This item had no direct safety significance and there were no facts to suggest a generic problem.

~~This issue has been referred to the NRC Office of Investigations (OI) for determination of any wrongdoing.~~

Potential Violations: None.]

Actions Required: None.

References:

1. NCR 5594 and attachments.
2. NCR 6263 (see Allegation A-141).
3. Letter from R. S. Leddick, LP&L to D. G. Eisenhut, NRC, "Docket No. 50-382, Waterford Unit 3 Allegations," April 27, 1984, Item 2.
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Statement Prepared By:

S. B. Kim

Date

Reviewed By:

Team Leader

Date

Reviewed By:

Site Team Leader(s)

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Approved By:

Task Management

Date

SSER

Original in File

Task: Allegation A-136

Reference No.: 4-84-A-06-31

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*A-53 and A-283
Allegation A-49
address the issue of individuals
not being free to write NCR's.*

*Let's refer to
Harrison's writeup dealing
with "discouraged from
writing NCR's?"*

FINAL SSER ROUTING

Revision :	0	1	2	3
Denny Crutchfield				<i>[Signature]</i>
Jim Gagliardo				<i>[Signature]</i> 11/8/17

Make Change as indicated

[Handwritten mark]

This item had no direct safety significance and there were no facts to suggest a generic problem.

[This issue has been referred to the NRC Office of Investigations (OI) for determination of any wrongdoing.]

[Potential Violations: None.]

Actions Required: None.

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2. NCR 6263 (see Allegation A-141).
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Statement Prepared By:

S. B. Kim

Date

Reviewed By:

Team Leader

Date

Reviewed By:

Site Team Leader(s)

Date

Approved By:

Task Management

Date

Re type
Re route
4/15

Rec'd
8/8/84

SHAW M. COLE

Comments by
McCORKLE

REVISION 2³
~~6/28/84~~
08/15/84

SSER

Task: Allegation A-136

Reference No.: 4-84-A-06-31

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What has this got to do with the allegation. It only indicates procedures were in place!

H Based on the staff's review of typical DN's and NCR's written in the civil-structural discipline in the 1975-1977 time frame, it appeared that all significant issues were considered against the in-place QA procedures. The difficulty of

A-136

-2-

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H Potential Violations: None.

Actions Required: None.

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S. B. Kim

Date

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Team Leader

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Site Team Leader(s)

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Task Management

Date

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Document Name:
SSER A-136

Requestor's ID:
JOHNNIE

Author's Name:

Document Comments:

Document Name:

SSER A-136

Requestor's ID:

JOYCE

Author's Name:

Final

Document Comments:

FINAL SSER ROUTING

A 136

Revision :	0	1	2	3
✓ Denny Crutchfield	<i>DMC</i> <i>6/20</i>	<i>F</i> <i>4</i>	<i>F</i> <i>1</i>	
✓ Jim Gagliardo	<i>6/20</i>	<i>4</i>	<i>N</i> <i>A</i> <i>✓</i>	

SSER

Task: Allegation A-136

Reference No.: 4-84-A-06-31

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[This issue has been referred to the NRC Office of Investigations (OI) for determination of any wrongdoing.]

[Potential Violations: None.]

Actions Required: None.

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Statement Prepared By:

S. B. Kim

Date

Reviewed By:

Team Leader

Date

Reviewed By:

Site Team Leader(s)

Date

Approved By:

Task Management

Date

Document Name:

SSER A-136

FILE

Requestor's ID:

CONNIE

Author's Name:

Document Comments:

SSER

Task: Allegation A-136

Reference No.: 4-84-A-06-31

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3. The NRC staff reviewed sample DNS written between 1975 and 1977 and found none that addressed significant safety issues which were not upgraded to NCRs.

[This issue has been referred to the NRC Office of Investigations (OI) for determination of any wrongdoing.]

[Potential Violations: None.]

Actions Required: None.

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Statement Prepared By:

S. B. Kim

Date

Reviewed By:

Team Leader

Date

Reviewed By:

Site Team Leader(s)

Date

Approved By:

Task Management

Date

Document Name:

SSER A-136

Requestor's ID:

CONNIE

Author's Name:

Document Comments:

FINAC

SSER

Task: Allegation A-136

Reference No.: 4-84-A-06-31

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[This issue has been referred to the NRC Office of Investigations (OI) for determination of any wrongdoing.]

[Potential Violations: None.]

Actions Required: None.

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Statement Prepared By: _____
S. B. Kim Date

Reviewed By: _____
Team Leader Date

Reviewed By: _____
Site Team Leader(s) Date

Approved By: _____
Task Management Date

WATERFORD OPEN ISSUE

Task: A-136

Reference No.: 4-84-A-06/31

Characterization: It is alleged that it was difficult for EBASCO quality assurance personnel to get approval to initiate a formal nonconformance report between 1975 and 1977 in the civil-structural discipline.

Initial Assessment of Significance: If this allegation were to be substantiated, it could indicate that undue pressure was applied to individuals or that problems of safety significance were not formally identified, corrected, and utilized in a trending analysis.

Source: Allegor["A"] transcript, page 26.

Approach to Resolution:

1. "After Action Report," Phearson to Griggs, December 15, 1975, should be reviewed.
2. J. A. Jones and EBASCO procedures for NCRs should be reviewed including the project definitions for classifying events into the quality control system.
3. Review other documents which might contain information relative to nonconforming conditions.
4. Evaluate the results and prepare an SSER writes.

Status:

Review Lead: L. Shao, Civil-Structural

Support: None

Estimated Resources: 1 man-week

Estimated Completion: May 25, 1984

CLOSURE:

Document Name:
SSER A-136

Requestor's ID:
CONNIE

Author's Name:

Document Comments:

SSER

Task: Allegation A-136

Reference No.: 4-84-A-06-31

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3. The NRC staff reviewed sample DNs written between 1975 and 1977 and found none that addressed significant safety issues which were not upgraded to NCRs.

In view of the NRC staff's assessment, this allegation has neither safety significance nor generic implications. This conclusion is contingent upon the results of investigations being performed by the NRC Office of Investigations and further technical evaluations may be necessary depending on the outcome of these investigations.

Potential Violations: None.

Actions Required: None.

References

1. NCR 5594 and attachments.
2. NCR 6263 (see Allegation A-141).
3. Letter from R. S. Leddick, LP&L to D. G. Eisenhut, NRC, "Docket No. 50-382, Waterford Unit 3 Allegations," April 27, 1984, item 2.
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Statement Prepared By: _____
S. B. Kim Date

Reviewed By: _____
Team Leader Date

Reviewed By: _____
Site Team Leader(s) Date

Approved By: _____
Task Management Date

Document Name:
A-136

Requestor's ID:
JOHNNIE

Author's Name:
SHEWMAKER/jkh

Document Comments:
Waterford Open Issue - A-136

Retype Draft 2

shew.

DRAFT 1
7/17/84

WATERFORD OPEN ISSUE

Task: A-136

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Status:

Review Lead: L. Shao, Civil-Structural

Support: None

Estimated Resources: 1 man-week

Estimated Completion: May 25, 1984

CLOSURE:

Document Name:
SSER A-136 *file*

Requestor's ID:
PATTYN

Author's Name:

Document Comments:

SSER

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[This issue has been referred to the NRC Office of Investigations (OI) for determination of any wrongdoing.]

[Potential Violations: None.]

Actions Required: None.

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Statement Prepared By: _____
S. B. Kim Date

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2. LP&L has re-evaluated all the concrete packages, soils packages, and structural steel construction packages and found that there is no significant violation of procedures and construction requirements. The NRC staff found no issues during this period which clearly indicated an NCR should have been written in the civil-structural discipline but was not.

3. The NRC staff reviewed sample DNs written between 1975 and 1977 and found none that addressed significant safety issues which were not upgraded to NCRs.

~~In view of the NRC staff's assessment, this allegation has neither safety significance nor generic implications. This conclusion is contingent upon the results of investigations being performed by the NRC Office of Investigations and further technical evaluations may be necessary depending on the outcome of these investigations.~~ *issue been referred to*
(OI) *for determination of any wrongdoing*

Potential Violations: None.

Actions Required: None.

References

1. NCR 5594 and attachments.
2. NCR 6263 (see Allegation A-141).
3. Letter from R. S. Leddick, LP&L to D. G. Eisenhut, NRC, "Docket No. 50-382, Waterford Unit 3 Allegations," April 27, 1984, item 2.
4. EBASCO Services Inc., Waterford-3 Procedure for Nonconformance Report ASP-III-6, March 5, 1975.
5. J. A. Jones Discrepancy Report, Number 0079 "Concrete Void," June 30, 1976.

Statement Prepared By: _____
S. B. Kim Date

Reviewed By: _____
Team Leader Date

Reviewed By: _____
Site Team Leader(s) Date

Approved By: _____
Task Management Date