

!!!WITHDRAWN - DO NOT INCLUDE IN FINAL SSER - DO NOT DELETE!!!

REVISION 1  
07/01/84

SSER

Task: Allegation A-141

Reference No.: 4-84-A-06/36

Characterization: It is alleged that EBASCO discrepancy notices (DNs) written during a review of 70 out of 1200 J. A. Jones concrete placement packages were listed on a log, and that the log was required to be maintained by EBASCO instruction QA 9-IA. The alleged expressed concern as to whether these DNs were considered in the quality assurance (QA) review of the concrete placement packages.

Assessment of Allegation: The NRC staff determined that no EBASCO QA procedure or instruction designated QA 9-IA existed. The staff believed that EBASCO Procedure QAI-9A and its supplement, QAIRGs No. 48-1, QAI-9A, were the instructions referred to by the alleged. The NRC staff found that these instructions had been voided and replaced by QAI-9, Revision 2. Revision 2 was in existence when the 70 J. A. Jones concrete placement packages were reviewed by the EBASCO Quality Assurance Installation Review Group (QAIRG).

EBASCO Procedure QAI-9A and its supplement, both of which had been voided, contained a form denoted as QAI 9.2 (Form 9.2). QAI-9, Revision 2 also contained this form. Form 9.2 provided for creation of a log on which each document and item number was identified, and on which were recorded the results of QAIRG reviews conducted for completeness, accuracy, and legibility. The NRC staff noted that the log pertained to deficiency reports (DRs), not to deficiency notices (DNs) as alleged. Consequently, the NRC staff did not attempt to locate DNs, but instead attempted to locate DRs issued by EBASCO QAIRG which should have been in EBASCO's QA records.

In reviewing EBASCO QAIRG records, the NRC staff did not locate the DRs. However, the staff did discover internal correspondence indicating that, prior to the date of this allegation, two EBASCO QAIRG reviews in the area of Civil Quality Assurance Concrete Documentation had been performed. This correspondence in the records was the only indication that reviews of the 70 concrete placement packages had been performed as alleged; the staff searched EBASCO QA records but found no reference to the two EBASCO QAIRG reviews, and no documentation on which specific concrete placement packages had been reviewed.

Based on the reference in the EBASCO internal correspondence to the two QAIRG reviews, the NRC staff contacted personnel identified by the alleged as having knowledge of "the log." From these interviews, the staff still could not discover the whereabouts of the log or DRs. However a former EBASCO project quality assurance manager (PQAM) indicated that the first QAIRG review was a preliminary review of the J. A. Jones concrete placement packages under Procedure QAI-9. The PQAM related to the NRC staff that, because the preliminary

review resulted in the decision to perform a 100% re-review, the records initially generated by the QAIRG were "nullified." Additionally, an EBASCO QA engineer told the NRC staff that he had contacted two former EBASCO employees who had been part of QAIRG's preliminary review; they had told him that, "to the best of their recollection," there had not been any DRs "written under QAI-9.2" (apparently meaning on Form 9.2).

The NRC staff also learned during the interviews that a second review by QAIRG, which was to have addressed the fuel handling building, should have been documented on Form 9.2 in accordance with Procedure QAI-9, Revision 2. The NRC staff, reviewing EBASCO records, was able to locate only a transmittal log which listed activities such as concrete placement numbers and which included a check-off column with the heading, "9.2, Yes or No." The NRC staff did not believe this to be the specific log referred to by the alleged, but did note that the log linked some of the alleged's concerns with concrete placement packages and Form 9.2. The transmittal log referenced some concrete placement packages reviewed by QAIRG; the NRC staff sampled three of these packages but found no information, data sheets, or other logs related to Procedure QAI-9A or its supplement (both previously voided), or to the current QAI-9, Revision 2.

In assessing this allegation, which included a review of EBASCO records and interviews with EBASCO personnel, the staff was unable to identify the 70 J. A. Jones concrete placement packages which the QAIRG had reviewed (referred to by the alleged), was unable to locate any EBASCO "log" of deficiencies under EBASCO Procedure QAI-9 or QAI-9A (incorrectly referred to as QA 9-1A in the allegation), and was unable to locate any EBASCO DRs (referred to as DNs by the alleged).

The NRC staff did, however, confirm that EBASCO had performed a 100% re-review of concrete placement packages after the QAIRG review of the first 70 packages. The NRC staff learned that the alleged was not aware of EBASCO's 100% re-review. Also, EBASCO re-reviewed all the DNs. As a result, nonconformance reports (NCRs) were generated and were correctly dispositioned. The NRC staff also reviewed another sample of concrete placement packages, and reviewed EBASCO's disposition of the DNs and NCRs. The NRC staff's review of the concrete placement packages indicated only minor discrepancies (see Allegation A-109); EBASCO's records of their 100% re-review were found to be acceptable (see Allegation A-112/A-131/A-269).

Based on the NRC staff's own review of a sample of concrete placement packages, EBASCO records were found adequate. However, the staff cannot verify that the deficiencies found in the initial review of 70 concrete placement packages (referred to by the alleged) were included in the deficiencies resulting from the 100% re-review. The NRC staff believes this is an indication of missing QA records, and has referred this information to the NRC Office of Investigations (OI).

This specific allegation has neither safety significance nor generic implications.

[Potential Violations: None.]

Actions Required: None.

References:

1. EBASCO Interoffice Correspondence, J. D. Davis to M. Burgard, "Evaluation of Civil/Structural Documentation stored in the QA Record Vault," December 9, 1982 (A-113).
2. Letter from R. S. Leddick, LP&L, to D. G. Eisenhut, NRC (Response to Question 2), April 27, 1984.
3. EBASCO Interoffice Correspondence, Burgard to Stinson, March 28, 1983, File Reference W3-QAIRC-409.
4. Extracts from QAI-9, Revision 0, October 31, 1979; and Revision 2, April 20, 1983.
5. Extracts from QAI-9A, Revision 0, September 21, 1982.
6. QAI-9A, QAIRGS 48-1, EBASCO Force Account (Concrete Structures).
7. QAI-9A, QAIRGS 48-2, EBASCO Force Account (Steel Structures).
8. QAI-9, QAIRGS 48-3, QAIRC - Concrete Structures.
9. EBASCO Interoffice Correspondence, Hill to Czyrko, June 6, 1983.
10. QAI-9, Revision 2, April 20, 1983.
11. EBASCO Construction Installation Records Review Transmittal Log.

Statement Prepared By:

S. Kim

\_\_\_\_\_ Date

Reviewed By:

Team Leader

\_\_\_\_\_ Date

Reviewed By:

Site Team Leader(s)

\_\_\_\_\_ Date

A-141

- 4 -

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Task Management

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Characterization: It is alleged that EBASCO discrepancy notices (DNs) written during a review of 70 out of 1200 J. A. Jones concrete placement packages were listed on a log, and that the log was required to be maintained by EBASCO instruction QA 9-IA. The allegor expressed concern as to whether these DNs were considered in the quality assurance (QA) review of the concrete placement packages.

Assessment of Allegation: The NRC staff determined that no EBASCO QA procedure or instruction designated QA 9-IA existed. The staff believed that EBASCO Procedure QAI-9A and its supplement, QAIRGs No. 48-1, QAI-9A, were the instructions referred to by the allegor. The NRC staff found that these instructions had been voided and replaced by QAI-9, Revision 2. Revision 2 was in existence when the 70 J. A. Jones concrete placement packages were reviewed by the EBASCO Quality Assurance Installation Review Group (QAIRG).

EBASCO Procedure QAI-9A and its supplement, both of which had been voided, contained a form denoted as QAI 9.2 (Form 9.2). QAI-9, Revision 2 also contained this form. Form 9.2 provided for creation of a log on which each document and item number was identified, and on which were recorded the results of QAIRG reviews conducted for completeness, accuracy, and legibility. The NRC staff noted that the log pertained to deficiency reports (DRs), not to deficiency notices (DNs) as alleged. Consequently, the NRC staff did not attempt to locate DNs, but instead attempted to locate DRs issued by EBASCO QAIRG which should have been in EBASCO's QA records.

In reviewing EBASCO QAIRG records, the NRC staff did not locate the DRs. However, the staff did discover internal correspondence indicating that, prior to the date of this allegation, two EBASCO QAIRG reviews in the area of Civil Quality Assurance Concrete Documentation had been performed. This correspondence in the records was the only indication that reviews of the 70 concrete placement packages had been performed as alleged; the staff searched EBASCO QA records but found no reference to the two EBASCO QAIRG reviews, and no documentation on which specific concrete placement packages had been reviewed.

Based on the reference in the EBASCO internal correspondence to the two QAIRG reviews, the NRC staff contacted personnel identified by the allegor as having knowledge of "the log." From these interviews, the staff still could not discover the whereabouts of the log or DRs. However a former EBASCO project quality assurance manager (PQAM) indicated that the first QAIRG review was a preliminary review of the J. A. Jones concrete placement packages under Procedure QAI-9. The PQAM related to the NRC staff that, because the preliminary

review resulted in the decision to perform a 100% re-review, the records initially generated by the QAIRG were "nullified." Additionally, an EBASCO QA engineer told the NRC staff that he had contacted two former EBASCO employees who had been part of QAIRG's preliminary review; they had told him that, "to the best of their recollection," there had not been any DRs "written under QAI-9.2" (apparently meaning on Form 9.2).

The NRC staff also learned during the interviews that a second review by QAIRG, which was to have addressed the fuel handling building, should have been documented on Form 9.2 in accordance with Procedure QAI-9, Revision 2. The NRC staff, reviewing EBASCO records, was able to locate only a transmittal log which listed activities such as concrete placement numbers and which included a check-off column with the heading, "9.2, Yes or No." The NRC staff did not believe this to be the specific log referred to by the allegor, but did note that the log linked some of the allegor's concerns with concrete placement packages and Form 9.2. The transmittal log referenced some concrete placement packages reviewed by QAIRG; the NRC staff sampled three of these packages but found no information, data sheets, or other logs related to Procedure QAI-9A or its supplement (both previously voided), or to the current QAI-9, Revision 2.

In assessing this allegation, which included a review of EBASCO records and interviews with EBASCO personnel, the staff was unable to identify the 70 J. A. Jones concrete placement packages which the QAIRG had reviewed (referred to by the allegor), was unable to locate any EBASCO "log" of deficiencies under EBASCO Procedure QAI-9 or QAI-9A (incorrectly referred to as QA 9-IA in the allegation), and was unable to locate any EBASCO DRs (referred to as DN's by the allegor).

The NRC staff did, however, confirm that EBASCO had performed a 100% re-review of concrete placement packages after the QAIRG review of the first 70 packages. The NRC staff learned that the allegor was not aware of EBASCO's 100% re-review. Also, EBASCO re-reviewed all the DN's. As a result, nonconformance reports (NCR's) were generated and were correctly dispositioned. The NRC staff also reviewed another sample of concrete placement packages, and reviewed EBASCO's disposition of the DN's and NCR's. The NRC staff's review of the concrete placement packages indicated only minor discrepancies (see Allegation A-109); EBASCO's records of their 100% re-review were found to be acceptable (see Allegation A-112/A-131/A-269).

Based on the NRC staff's own review of a sample of concrete placement packages, EBASCO records were found adequate. However, the staff cannot verify that the deficiencies found in the initial review of 70 concrete placement packages (referred to by the allegor) were included in the deficiencies resulting from the 100% re-review. The NRC staff believes this is an indication of missing QA records, and has referred this information to the NRC Office of Investigations (OI).

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[Potential Violations: None.]

Actions Required: None.

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9. EBASCO Interoffice Correspondence, Hill to Czyrko, June 6, 1983.
10. QAI-9, Revision 2, April 20, 1983.
11. EBASCO Construction Installation Records Review Transmittal Log.

Statement Prepared By:

S. Kim

\_\_\_\_\_ Date

Reviewed By:

Team Leader

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Site Team Leader(s)

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Allegation A-141

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Approved By:

Task Management

Date

Document Name:

SSER A-141

Requestor's ID:

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Document Comments:

comm from displaywriter 5/29/84

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FINAL SSER ROUTING

*A-147 A-141*

Revision :	0	1	2	3
✓ Denny Crutchfield	<i>[Signature]</i>	<i>F</i>		
✓ Jim Gagliardo	<i>[Signature]</i>	<i>N</i> <i>AL</i>		

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SSER

Task: Allegation A-141

Reference No.: 4-84-A-06/36

Characterization: It is alleged that EBASCO discrepancy notices (DNs) written during a review of 70 out of 1200 J. A. Jones concrete placement packages were listed on a log, and that the log was required to be maintained by EBASCO instruction QA 9-IA. The alleged expressed concern as to whether these DNs were considered in the quality assurance (QA) review of the concrete placement packages.

Assessment of Allegation: The NRC staff determined that no EBASCO QA procedure or instruction designated QA 9-IA existed. The staff believed that EBASCO Procedure QAI-9A and its supplement, QAIRGs No. 48-1, QAI-9A, were the instructions referred to by the alleged. The NRC staff found that these instructions had been voided and replaced by QAI-9, Revision 2. Revision 2 was in existence when the 70 J. A. Jones concrete placement packages were reviewed by the EBASCO Quality Assurance Installation Review Group (QAIRG).

EBASCO Procedure QAI-9A and its supplement, both of which had been voided, contained a form denoted as QAI 9.2 (Form 9.2). QAI-9, Revision 2 also contained this form. Form 9.2 provided for creation of a log on which each document and item number was identified, and on which were recorded the results of QAIRG reviews conducted for completeness, accuracy, and legibility. The NRC staff noted that the log pertained to deficiency reports (DRs), not to deficiency notices (DNs) as alleged. Consequently, the NRC staff did not attempt to locate DNs, but instead attempted to locate DRs issued by EBASCO QAIRG which should have been in EBASCO's QA records.

In reviewing EBASCO QAIRG records, the NRC staff did not locate the DRs. However, the staff did discover internal correspondence indicating that, prior to the date of this allegation, two EBASCO QAIRG reviews in the area of Civil Quality Assurance Concrete Documentation had been performed. This

correspondence in the records was the only indication that reviews of the 70 concrete placement packages had been performed as alleged; the staff searched EBASCO QA records but found no reference to the two EBASCO QAIRG reviews, and no documentation on which specific concrete placement packages had been reviewed.

Based on the reference in the EBASCO internal correspondence to the two QAIRG reviews, the NRC staff contacted personnel identified by the alleged as having knowledge of "the log." From these interviews, the staff still could not discover the whereabouts of the log or DRs. However a former EBASCO project quality assurance manager (PQAM) indicated that the first QAIRG review was a preliminary review of the J. A. Jones concrete placement packages under Procedure QAI-9. The PQAM related to the NRC staff that, because the preliminary review resulted in the decision to perform a 100% re-review, the records initially generated by the QAIRG were "nullified." Additionally, an EBASCO QA engineer told the NRC staff that he had contacted two former EBASCO employees who had been part of QAIRG's preliminary review; they had told him that, "to the best of their recollection," there had not been any DRs "written under QAI-9.2" (apparently meaning on Form 9.2).

The NRC staff also learned during the interviews that a second review by QAIRG, which was to have addressed the fuel handling building, should have been documented on Form 9.2 in accordance with Procedure QAI-9, Revision 2. The NRC staff, reviewing EBASCO records, was able to locate only a transmittal log which listed activities such as concrete placement numbers and which included a check-off column with the heading "9.2, Yes or No." The NRC staff did not believe this to be the specific log referred to by the alleged, but did note that the log linked some of the alleged's concerns with concrete placement packages and Form 9.2. The transmittal log referenced some concrete placement packages reviewed by QAIRG; the NRC staff sampled three of these packages but found no information, data sheets, or other logs related to Procedure QAI-9A or its supplement (both previously voided), or to the current QAI-9, Revision 2.



In assessing this allegation, which included a review of EBASCO records and interviews with EBASCO personnel, the staff was unable to identify the 70 J. A. Jones concrete placement packages which the QAIRG had reviewed (referred to by the allegor), was unable to locate any EBASCO "log" of deficiencies under EBASCO Procedure QAI-9 or QAI-9A (incorrectly referred to as QA 9-IA in the allegation), and was unable to locate any EBASCO DRs (referred to as DNs by the allegor).

The NRC staff did, however, confirm that EBASCO had performed a 100% re-review of concrete placement packages after the QAIRG review of the first 70 packages. The NRC staff learned that the allegor was not aware of EBASCO's 100% re-review. Also, EBASCO re-reviewed all the DNs. As a result, nonconformance reports (NCRs) were generated and were correctly dispositioned. The NRC staff also reviewed another sample of concrete placement packages, and reviewed EBASCO's disposition of the DNs and NCRs. The NRC staff's review of the concrete placement packages indicated only minor discrepancies (see Allegation A-109); EBASCO's records of their 100% re-review were found to be acceptable (see Allegation A-112/A-131/A-269).

Based on the NRC staff's own review of a sample of concrete placement packages, EBASCO records were found adequate. However, the staff cannot verify that the deficiencies found in the initial review of 70 concrete placement packages (referred to by the allegor) were included in the deficiencies resulting from the 100% re-review. The NRC staff believes this is an indication of missing QA records, and has referred this information to the NRC Office of Investigations (OI).

This specific allegation has neither safety significance nor generic implications.

Potential Violations: None.

Actions Required: None.

## References

1. EBASCO Interoffice Correspondence, J. D. Davis to M. Burgard, "Evaluation of Civil/Structural Documentation stored in the QA Record Vault," December 9, 1982 (A-113).
2. Letter from R. S. Leddick, LP&L, to D. G. Eisenhut, NRC (Response to Question 2), April 27, 1984.
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Statement Prepared By:

S. Kim

Date

Reviewed By:

Team Leader

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Task Management

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Document Name:  
SSER A-141

Requestor's ID:  
JOHNNIE

Author's Name:

Document Comments:  
comm from displaywriter 5/29/84

SSER

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Assessment of Allegation: The NRC staff determined that no EBASCO QA procedure or instruction designated QA 9-IA existed. The staff believed that EBASCO Procedure QAI-9A and its supplement, QAIRGs No. 48-1, QAI-9A, were the instructions referred to by the alleged. The NRC staff found that these instructions had been voided and replaced by QAI-9, Revision 2. Revision 2 was in existence when the 70 J. A. Jones concrete placement packages were reviewed by the EBASCO Quality Assurance Installation Review Group (QAIRG).

EBASCO Procedure QAI-9A and its supplement, both of which had been voided, contained a form denoted as QAI 9.2 (Form 9.2). QAI-9, Revision 2 also contained this form. Form 9.2 provided for creation of a log on which each document and item number was identified, and on which were recorded the results of QAIRG reviews conducted for completeness, accuracy, and legibility. The NRC staff noted that the log pertained to deficiency reports (DRs), not to deficiency notices (DNs) as alleged. Consequently, the NRC staff did not attempt to locate DNs, but instead attempted to locate DRs issued by EBASCO QAIRG which should have been in EBASCO's QA records.

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In assessing this allegation, which included a review of EBASCO records and interviews with EBASCO personnel, the staff was unable to identify the 70 J. A. Jones concrete placement packages which the QAIRG had reviewed (referred to by the alleged), was unable to locate any EBASCO "log" of deficiencies under EBASCO Procedure QAI-9 or QAI-9A (incorrectly referred to as QA 9-1A in the allegation), and was unable to locate any EBASCO DRs (referred to as DNs by the alleged).

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Potential Violations: None.

Actions Required: None.

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1. EBASCO Interoffice Correspondence, J. D. Davis to M. Burgard, "Evaluation of Civil/Structural Documentation stored in the QA Record Vault," December 9, 1982 (A-113).
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In reviewing EBASCO QAIRG records, the NRC staff did not locate the DRs. However, the staff did discover internal correspondence indicating that, prior to the date of this allegation, two EBASCO QAIRG reviews in the area of Civil Quality Assurance Concrete Documentation had been performed. This

correspondence in the records was the only indication that reviews of the 70 concrete placement packages had been performed as alleged; the staff searched EBASCO QA records but found no reference to the two EBASCO QAIRG reviews, and no documentation on which specific concrete placement packages had been reviewed.

Based on the reference in the EBASCO internal correspondence to the two QAIRG reviews, the NRC staff contacted personnel identified by the allegor as having knowledge of "the log." From these interviews, the staff still could not discover the whereabouts of the log or DRs. However a former EBASCO project quality assurance manager (PQAM) indicated that the first QAIRG review was a preliminary review of the J. A. Jones concrete placement packages under Procedure QAI-9. The PQAM related to the NRC staff that, because the preliminary review resulted in the decision to perform a 100% re-review, the records initially generated by the QAIRG were "nullified." Additionally, an EBASCO QA engineer told the NRC staff that he had contacted two former EBASCO employees who had been part of QAIRG's preliminary review; they had told him that, "to the best of their recollection," there had not been any DRs "written under QAI-9.2" (apparently meaning on Form 9.2).

The NRC staff also learned during the interviews that a second review by QAIRG, which was to have addressed the fuel handling building, should have been documented on Form 9.2 in accordance with Procedure QAI-9, Revision 2. The NRC staff, reviewing EBASCO records, was able to locate only a transmittal log which listed activities such as concrete placement numbers and which included a check-off column with the heading "9.2, Yes or No." The NRC staff did not believe this to be the specific log referred to by the allegor, but did note that the log linked some of the allegor's concerns with concrete placement packages and Form 9.2. The transmittal log referenced some concrete placement packages reviewed by QAIRG; the NRC staff sampled three of these packages but found no information, data sheets, or other logs related to Procedure QAI-9A or its supplement (both previously voided), or to the current QAI-9, Revision 2.

- 3 -

In assessing this allegation, which included a review of EBASCO records and interviews with EBASCO personnel, the staff was unable to identify the 70 J. A. Jones concrete placement packages which the QAIRG had reviewed (referred to by the allegor), was unable to locate any EBASCO "log" of deficiencies under EBASCO Procedure QAI-9 or QAI-9A (incorrectly referred to as QA 9-IA in the allegation), and was unable to locate any EBASCO DRs (referred to as DNS by the allegor).

The NRC staff did, however, confirm that EBASCO had performed a 100% re-review of concrete placement packages after the QAIRG review of the first 70 packages. The NRC staff learned that the allegor was not aware of EBASCO's 100% re-review. Also, EBASCO re-reviewed all the DNS. As a result, nonconformance reports (NCRs) were generated and were correctly dispositioned. The NRC staff also reviewed another sample of concrete placement packages, and reviewed EBASCO's disposition of the DNS and NCRs. The NRC staff's review of the concrete placement packages indicated only minor discrepancies (see Allegation A-109); EBASCO's records of their 100% re-review were found to be acceptable (see Allegation A-112/A-131/A-269).

Based on the NRC staff's own review of a sample of concrete placement packages, EBASCO records were found adequate. However, the staff cannot verify that the deficiencies found in the initial review of 70 concrete placement packages (referred to by the allegor) were included in the deficiencies resulting from the 100% re-review. The NRC staff believes this is an indication of missing QA records, and has referred this information to the NRC Office of Investigations (OI).

This specific allegation has neither safety significance nor generic implications.

[Potential Violations: None.]

Actions Required: None.

References

1. EBASCO Interoffice Correspondence, J. D. Davis to M. Burgard, "Evaluation of Civil/Structural Documentation stored in the QA Record Vault," December 9, 1982 (A-113).
2. Letter from R. S. Leddick, LP&L, to D. G. Eisenhut, NRC (Response to Question 2), April 27, 1984.
3. EBASCO Interoffice Correspondence, Burgard to Stinson, March 28, 1983, File Reference W3-QAIRG-409.
4. Extracts from QAI-9, Revision 0, October 31, 1979; and Revision 2, April 20, 1983.
5. Extracts from QAI-9A, Revision 0, September 21, 1982.
6. QAI-9A, QAIRGS 48-1, EBASCO Force Account (Concrete Structures).
7. QAI-9A, QAIRGS 48-2, EBASCO Force Account (Steel Structures).
8. QAI-9, QAIRGS 48-3, QAIRG - Concrete Structures.
9. EBASCO Interoffice Correspondence, Hill to Czyako, June 6, 1983.
10. QAI-9, Revision 2, April 20, 1983.
11. EBASCO Construction Installation Records Review Transmittal Log.

Statement Prepared By:

S. Kim

Date

Reviewed By:

Team Leader

Date

Reviewed By:

Site Team Leader(s)

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Approved By:

Task Management

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Document Name:

SSER A-141

Requestor's ID:

CONNIE

Author's Name:

Document Comments:

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SSER

Task: Allegation A-141

Reference No.: 4-84-A-06/36

Characterization: It is alleged that EBASCO discrepancy notices (DNs) written during a review of 70 out of 1200 J. A. Jones concrete placement packages were listed on a log, and that the log was required to be maintained by EBASCO instruction QA 9-IA. The allegor expressed concern as to whether these DNs were considered in the quality assurance (QA) review of the concrete placement packages.

Assessment of Allegation: The NRC staff determined that no EBASCO QA procedure or instruction designated QA 9-IA existed. The staff believed that EBASCO Procedure QAI-9A and its supplement, QAIRGs No. 48-1, QAI-9A, were the instructions referred to by the allegor. The NRC staff found that these instructions had been voided and replaced by QAI-9, Revision 2. Revision 2 was in existence when the 70 J. A. Jones concrete placement packages were reviewed by the EBASCO Quality Assurance Installation Review Group (QAIRG).

EBASCO Procedure QAI-9A and its supplement, both of which had been voided, contained a form denoted as QAI 9.2 (Form 9.2). QAI-9, Revision 2 also contained this form. Form 9.2 provided for creation of a log on which each document and item number was identified, and on which were recorded the results of QAIRG reviews conducted for completeness, accuracy, and legibility. The NRC staff noted that the log pertained to deficiency reports (DRs), not to deficiency notices (DNs) as alleged. Consequently, the NRC staff did not attempt to locate DNs, but instead attempted to locate DRs issued by EBASCO QAIRG which should have been in EBASCO's QA records.

In reviewing EBASCO QAIRG records, the NRC staff did not locate the DRs. However, the staff did discover internal correspondence indicating that, prior to the date of this allegation, two EBASCO QAIRG reviews in the area of Civil Quality Assurance Concrete Documentation had been performed. This

correspondence in the records was the only indication that reviews of the 70 concrete placement packages had been performed as alleged; the staff searched EBASCO QA records but found no reference to the two EBASCO QAIRG reviews, and no documentation on which specific concrete placement packages had been reviewed.

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The NRC staff also learned during the interviews that a second review by QAIRG, which was to have addressed the fuel handling building, should have been documented on Form 9.2 in accordance with Procedure QAI-9, Revision 2. The NRC staff, reviewing EBASCO records, was able to locate only a transmittal log which listed activities such as concrete placement numbers and which included a check-off column with the heading "9.2, Yes or No." The NRC staff did not believe this to be the specific log referred to by the alleged, but did note that the log linked some of the alleged's concerns with concrete placement packages and Form 9.2. The transmittal log referenced some concrete placement packages reviewed by QAIRG; the NRC staff sampled three of these packages but found no information, data sheets, or other logs related to Procedure QAI-9A or its supplement (both previously voided), or to the current QAI-9, Revision 2.



In assessing this allegation, which included a review of EBASCO records and interviews with EBASCO personnel, the staff was unable to identify the 70 J. A. Jones concrete placement packages which the QAIRG had reviewed (referred to by the allegor), was unable to locate any EBASCO "log" of deficiencies under EBASCO Procedure QAI-9 or QAI-9A (incorrectly referred to as QA 9-IA in the allegation), and was unable to locate any EBASCO DRs (referred to as DNs by the allegor).

The NRC staff did, however, confirm that EBASCO had performed a 100% re-review of concrete placement packages after the QAIRG review of the first 70 packages. The NRC staff learned that the allegor was not aware of EBASCO's 100% re-review. Also, EBASCO re-reviewed all the DNs, as a result, nonconformance reports (NCRs) were generated and were correctly dispositioned. The NRC staff also reviewed another sample of concrete placement packages, and reviewed EBASCO's disposition of the DNs and NCRs. The NRC staff's review of the concrete placement packages indicated only minor discrepancies (see Allegation A-109); EBASCO's records of their 100% re-review were found to be acceptable (see Allegation A-112/A-131/A-269).

Based on the NRC staff's own review of a sample of concrete placement packages, EBASCO records were found adequate. However, the staff cannot verify that the deficiencies found in the initial review of 70 concrete placement packages (referred to by the allegor) were included in the deficiencies resulting from the 100% re-review. The NRC staff believes this is an indication of missing QA records, and has referred this information to the NRC Office of Investigations (OI).

This specific allegation has neither safety significance nor generic implications.

[Potential Violations: None.]

Actions Required: None.

## References

1. EBASCO Interoffice Correspondence, J. D. Davis to M. Burgard, "Evaluation of Civil/Structural Documentation stored in the QA Record Vault," December 9, 1982 (A-113).
2. Letter from R. S. Leddick, LP&L, to D. G. Eisenhut, NRC (Response to Question 2), April 27, 1984.
3. EBASCO Interoffice Correspondence, Burgard to Stinson, March 28, 1983, File Reference W3-QAIRG-409.
4. Extracts from QAI-9, Revision 0, October 31, 1979; and Revision 2, April 20, 1983.
5. Extracts from QAI-9A, Revision 0, September 21, 1982.
6. QAI-9A, QAIRGS 48-1, EBASCO Force Account (Concrete Structures).
7. QAI-9A, QAIRGS 48-2, EBASCO Force Account (Steel Structures).
8. QAI-9, QAIRGS 48-3, QAIRG - Concrete Structures.
9. EBASCO Interoffice Correspondence, Hill to Czyako, June 6, 1983.
10. QAI-9, Revision 2, April 20, 1983.
11. EBASCO Construction Installation Records Review Transmittal Log.

Statement Prepared By:

S. Kim

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Document Name: *file*  
SSER A-141

Requestor's ID:  
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Author's Name:

Document Comments:  
comm from displaywriter 5/29/84

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Task: Allegation A-141

Reference No.: 4-84-A-06-36

Characterization: It is alleged that EBASCO discrepancy notices (DNs) written during a review of 70 out of 1200 J. A. Jones concrete placement packages were listed on a log, and that the log was required to be maintained by EBASCO instruction QA 9-IA. The alleged expressed concern as to whether these DNs were considered in the quality assurance (QA) review of the concrete placement packages.

Assessment of Allegation: The NRC staff determined that no EBASCO QA procedure or instruction designated QA 9-IA existed. The staff believed that EBASCO Procedure QAI-9A and its supplement, QAIRGs No. 48-1, QAI-9A, were the instructions referred to by the alleged. The NRC staff found that these instructions had been voided and replaced by QAI-9, Revision 2. Revision 2 was in existence when the 70 J. A. Jones concrete placement packages were reviewed by the EBASCO Quality Assurance Installation Review Group (QAIRG).

EBASCO Procedure QAI-9A and its supplement, both of which had been voided, contained a form denoted as QAI 9.2 (Form 9.2). QAI-9, Revision 2 also contained this form. Form 9.2 provided for creation of a log on which each document and item number was identified, and on which were recorded the results of QAIRG reviews conducted for completeness, accuracy, and legibility. The NRC staff noted that the log pertained to deficiency reports (DRs), not to deficiency notices (DNs) as alleged. Consequently, the NRC staff did not attempt to locate DNs, but instead attempted to locate DRs issued by EBASCO QAIRG which should have been in EBASCO's QA records.

In reviewing EBASCO QAIRG records, the NRC staff did not locate the DRs. However, the staff did discover internal correspondence indicating that, prior to the date of this allegation, two EBASCO QAIRG reviews in the area of Civil Quality Assurance Concrete Documentation had been performed. This

correspondence in the records was the only indication that reviews of the 70 concrete placement packages had been performed as alleged; the staff searched EBASCO QA records but found no reference to the two EBASCO QAIRG reviews, and no documentation on which specific concrete placement packages had been reviewed.

Based on the reference in the EBASCO internal correspondence to the two QAIRG reviews, the NRC staff contacted personnel identified by the alleged as having knowledge of "the log." From these interviews, the staff still could not discover the whereabouts of the log or DRs. However a former EBASCO project quality assurance manager (PQAM) indicated that the first QAIRG review was a preliminary review of the J. A. Jones concrete placement packages under Procedure QAI-9. The PQAM related to the NRC staff that, because the preliminary review resulted in the decision to perform a 100% re-review, the records initially generated by the QAIRG were "nullified." Additionally, an EBASCO QA engineer told the NRC staff that he had contacted two former EBASCO employees who had been part of QAIRG's preliminary review; they had told him that, "to the best of their recollection," there had not been any DRs "written under QAI-9.2" (apparently meaning on Form 9.2).

The NRC staff also learned during the interviews that a second review by QAIRG, which was to have addressed the fuel handling building, should have been documented on Form 9.2 in accordance with Procedure QAI-9, Revision 2. The NRC staff, reviewing EBASCO records, was able to locate only a transmittal log which listed activities such as concrete placement numbers and which included a check-off column with the heading "9.2, Yes or No." The NRC staff did not believe this to be the specific log referred to by the alleged, but did note that the log linked some of the alleged's concerns with concrete placement packages and Form 9.2. The transmittal log referenced some concrete placement packages reviewed by QAIRG; the NRC staff sampled three of these packages but found no information, data sheets, or other logs related to Procedure QAI-9A or its supplement (both previously voided), or to the current QAI-9, Revision 2.

In assessing this allegation, which included a review of EBASCO records and interviews with EBASCO personnel, the staff was unable to identify the 70 J. A. Jones concrete placement packages which the QAIRG had reviewed (referred to by the allegor), was unable to locate any EBASCO "log" of deficiencies under EBASCO Procedure QAI-9 or QAI-9A (incorrectly referred to as QA 9-IA in the allegation), and was unable to locate any EBASCO DRs (referred to as DNs by the allegor).

The NRC staff did, however, confirm that EBASCO had performed a 100% re-review of concrete placement packages after the QAIRG review of the first 70 packages. The NRC staff learned that the allegor was not aware of EBASCO's 100% re-review. Also, EBASCO re-reviewed all the DNs; as a result, nonconformance reports (NCRs) were generated and were correctly dispositioned. The NRC staff also reviewed another sample of concrete placement packages, and reviewed EBASCO's disposition of the DNs and NCRs. The NRC staff's review of the concrete placement packages indicated only minor discrepancies (see Allegation A-109); EBASCO's records of their 100% re-review were found to be acceptable (see Allegation A-112/A-131/A-269).

Based on the NRC staff's own review of a sample of concrete placement packages, EBASCO records were found adequate. However, the staff cannot verify that the deficiencies found in the initial review of 70 concrete placement packages (referred to by the allegor) were included in the deficiencies resulting from the 100% re-review. The NRC staff believes this is an indication of missing QA records, and has referred this information to the NRC Office of Investigations (OI).

This specific allegation has neither safety significance nor generic implications.

Potential Violations: None.]

Actions Required: None.

References

1. EBASCO Interoffice Correspondence, J. D. Davis to M. Burgard, "Evaluation of Civil/Structural Documentation stored in the QA Record Vault," December 9, 1982 (A-113).
2. Letter from R. S. Leddick, LP&L, to D. G. Eisenhut, NRC (Response to Question 2), April 27, 1984.
3. EBASCO Interoffice Correspondence, Burgard to Stinson, March 28, 1983, File Reference W3-QAIRC-409.
4. Extracts from QAI-9, Revision 0, October 31, 1979; and Revision 2, April 20, 1983.
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7. QAI-9A, QAIRGS 48-2, EBASCO Force Account (Steel Structures).
8. QAI-9, QAIRGS 48-3, QAIRC - Concrete Structures.
9. EBASCO Interoffice Correspondence, Hill to Czyako, June 6, 1983.
10. QAI-9, Revision 2, April 20, 1983.
11. EBASCO Construction Installation Records Review Transmittal Log.

Statement Prepared By:

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S. Kim

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Date

Reviewed By:

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Team Leader

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Reviewed By:

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Date

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Task Management

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Document Name:  
SSER A-141

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Requestor's ID:  
CONNIE

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Author's Name:

Document Comments:  
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Task: Allegation A-141

Reference No.: 4-84-A-06-36

Characterization: It is alleged that EBASCO discrepancy notices (DNs) written during a review of 70 out of 1200 J. A. Jones concrete placement packages were listed on a log, and that the log was required to be maintained by EBASCO instruction QA 9-IA. The allegor expressed concern as to whether these DNs were considered in the quality assurance (QA) review of the concrete placement packages.

Assessment of Allegation: The NRC staff determined that no EBASCO QA procedure or instruction designated QA 9-IA existed. The staff believed that EBASCO Procedure QAI-9A and its supplement, QAIRGs No. 48-1, QAI-9A, were the instructions referred to by the allegor. The NRC staff found that these instructions had been voided and replaced by QAI-9, Revision 2. Revision 2 was in existence when the 70 J. A. Jones concrete placement packages were reviewed by the EBASCO Quality Assurance Installation Review Group (QAIRG).

EBASCO Procedure QAI-9A and its supplement, both of which had been voided, contained a form denoted as QAI 9.2 (Form 9.2). QAI-9, Revision 2 also contained this form. Form 9.2 provided for creation of a log on which each document and item number was identified, and on which were recorded the results of QAIRG reviews conducted for completeness, accuracy, and legibility. The NRC staff noted that the log pertained to deficiency reports (DRs), not to deficiency notices (DNs) as alleged. Consequently, the NRC staff did not attempt to locate DNs, but instead attempted to locate DRs issued by EBASCO QAIRG which should have been in EBASCO's QA records.

In reviewing EBASCO QAIRG records, the NRC staff did not locate the DRs. However, the staff did discover internal correspondence indicating that, prior to the date of this allegation, two EBASCO QAIRG reviews in the area of Civil Quality Assurance Concrete Documentation had been performed. This

correspondence in the records was the only indication that reviews of the 70 concrete placement packages had been performed as alleged; the staff searched EBASCO QA records but found no reference to the two EBASCO QAIRG reviews, and no documentation on which specific concrete placement packages had been reviewed.

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The NRC staff also learned during the interviews that a second review by QAIRG, which was to have addressed the fuel handling building, should have been documented on Form 9.2 in accordance with Procedure QAI-9, Revision 2. The NRC staff, reviewing EBASCO records, was able to locate only a transmittal log which listed activities such as concrete placement numbers and which included a check-off column with the heading "9.2, Yes or No." The NRC staff did not believe this to be the specific log referred to by the alleged, but did note that the log linked some of the alleged's concerns with concrete placement packages and Form 9.2. The transmittal log referenced some concrete placement packages reviewed by QAIRG; the NRC staff sampled three of these packages but found no information, data sheets, or other logs related to Procedure QAI-9A or its supplement (both previously voided), or to the current QAI-9, Revision 2.

In assessing this allegation, which included a review of EBASCO records and interviews with EBASCO personnel, the staff was unable to identify the 70 J. A. Jones concrete placement packages which the QAIRG had reviewed (referred to by the allegor), was unable to locate any EBASCO "log" of deficiencies under EBASCO Procedure QAI-9 or QAI-9A (incorrectly referred to as QA 9-IA in the allegation), and was unable to locate any EBASCO DRs (referred to as DNs by the allegor).

The NRC staff did, however, confirm that EBASCO had performed a 100% re-review of concrete placement packages after the QAIRG review of the first 70 packages. The NRC staff learned that the allegor was not aware of EBASCO's 100% re-review. Also, EBASCO re-reviewed all the DNs; as a result, nonconformance reports (NCRs) were generated and were correctly dispositioned. The NRC staff also reviewed another sample of concrete placement packages, and reviewed EBASCO's disposition of the DNs and NCRs. The NRC staff's review of the concrete placement packages indicated only minor discrepancies (see Allegation A-109); EBASCO's records of their 100% re-review were found to be acceptable (see Allegation A-112/A-131/A-269).

Based on the NRC staff's own review of a sample of concrete placement packages, EBASCO records were found adequate. However, the staff cannot verify that the deficiencies found in the initial review of 70 concrete placement packages (referred to by the allegor) were included in the deficiencies resulting from the 100% re-review. The NRC staff believes this is an indication of missing QA records, and has referred this information to the NRC Office of Investigations (OI).

This specific allegation has neither safety significance nor generic implications.

Potential Violations: None.

Actions Required: None.

### References

1. EBASCO Interoffice Correspondence, J. D. Davis to M. Burgard, "Evaluation of Civil/Structural Documentation stored in the QA Record Vault," December 9, 1982 (A-113).
2. Letter from R. S. Leddick, LP&L, to D. G. Eisenhut, NRC (Response to Question 2), April 27, 1984.
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11. EBASCO Construction Installation Records Review Transmittal Log.

Statement Prepared By:

S. Kim

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Reviewed By:

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Document Name:  
SSER A-141

FILE

Requestor's ID:  
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Document Comments:  
comm from displaywriter 5/29/84

SSER

Task: Allegation A-141

Reference No.: 4-84-A-06-36

Characterization: It is alleged that EBASCO discrepancy notices (DNs) written during a review of 70 out of 1200 J. A. Jones concrete placement packages were listed on a log, and that the log was required to be maintained by EBASCO instruction QA 9-IA. The alleged expressed concern as to whether these DNs were considered in the quality assurance (QA) review of the concrete placement packages.

Assessment of Allegation: The NRC staff determined that no EBASCO QA procedure or instruction designated QA 9-IA existed. The staff believed that EBASCO Procedure QAI-9A and its supplement, QAIRGs No. 48-1, QAI-9A, were the instructions referred to by the alleged. The NRC staff found that these instructions had been voided and replaced by QAI-9, Revision 2. Revision 2 was in existence when the 70 J. A. Jones concrete placement packages were reviewed by the EBASCO Quality Assurance Installation Review Group (QAIRG).

EBASCO Procedure QAI-9A and its supplement, both of which had been voided, contained a form denoted as QAI 9.2 (Form 9.2). QAI-9, Revision 2 also contained this form. Form 9.2 provided for creation of a log on which each document and item number was identified, and on which were recorded the results of QAIRG reviews conducted for completeness, accuracy, and legibility. The NRC staff noted that the log pertained to deficiency reports (DRs), not to deficiency notices (DNs) as alleged. Consequently, the NRC staff did not attempt to locate DNs, but instead attempted to locate DRs issued by EBASCO QAIRG which should have been in EBASCO's QA records.

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Based on the reference in the EBASCO internal correspondence to the two QAIRG reviews, the NRC staff contacted personnel identified by the alleged as having knowledge of "the log." From these interviews, the staff still could not discover the whereabouts of the log or DRs. However a former EBASCO project quality assurance manager (PQAM) indicated that the first QAIRG review was a preliminary review of the J. A. Jones concrete placement packages under Procedure QAI-9. The PQAM related to the NRC staff that, because the preliminary review resulted in the decision to perform a 100% re-review, the records initially generated by the QAIRG were "nullified." Additionally, an EBASCO QA engineer told the NRC staff that he had contacted two former EBASCO employees who had been part of QAIRG's preliminary review; they had told him that, "to the best of their recollection," there had not been any DRs "written under QAI-9.2" (apparently meaning on Form 9.2).

The NRC staff also learned during the interviews that a second review by QAIRG, which was to have addressed the fuel handling building, should have been documented on Form 9.2 in accordance with Procedure QAI-9, Revision 2. The NRC staff, reviewing EBASCO records, was able to locate only a transmittal log which listed activities such as concrete placement numbers and which included a check-off column with the heading "9.2, Yes or No." The NRC staff did not believe this to be the specific log referred to by the alleged, but did note that the log linked some of the alleged's concerns with concrete placement packages and Form 9.2. The transmittal log referenced some concrete placement packages reviewed by QAIRG; the NRC staff sampled three of these packages but found no information, data sheets, or other logs related to Procedure QAI-9A or its supplement (both previously voided), or to the current QAI-9, Revision 2.



In assessing this allegation, which included a review of EBASCO records and interviews with EBASCO personnel, the staff was unable to identify the 70 J. A. Jones concrete placement packages which the QAIRG had reviewed (referred to by the allegor), was unable to locate any EBASCO "log" of deficiencies under EBASCO Procedure QAI-9 or QAI-9A (incorrectly referred to as QA 9-IA in the allegation), and was unable to locate any EBASCO DRs (referred to as DNs by the allegor).

The NRC staff did, however, confirm that EBASCO had performed a 100% re-review of concrete placement packages after the QAIRG review of the first 70 packages. The NRC staff learned that the allegor was not aware of EBASCO's 100% re-review. Also, EBASCO re-reviewed all the DNs; as a result, nonconformance reports (NCRs) were generated and were correctly dispositioned. The NRC staff also reviewed another sample of concrete placement packages, and reviewed EBASCO's disposition of the DNs and NCRs. The NRC staff's review of the concrete placement packages indicated only minor discrepancies (see Allegation A-109); EBASCO's records of their 100% re-review were found to be acceptable (see Allegation A-112/A-131/A-269).

Based on the NRC staff's own review of a sample of concrete placement packages, EBASCO records were found adequate. However, the staff cannot verify that the deficiencies found in the initial review of 70 concrete placement packages (referred to by the allegor) were included in the deficiencies resulting from the 100% re-review. The NRC staff believes this is an indication of missing QA records, and has referred this information to the NRC Office of Investigations (OI).

This specific allegation has neither safety significance nor generic implications.

Potential Violations: None.

Actions Required: None.

## References

1. EBASCO Interoffice Correspondence, J. D. Davis to M. Burgard, "Evaluation of Civil/Structural Documentation stored in the QA Record Vault," December 9, 1982 (A-113).
2. Letter from R. S. Leddick, LP&L, to D. G. Eisenhut, NRC (Response to Question 2), April 27, 1984.
3. EBASCO Interoffice Correspondence, Burgard to Stinson, March 28, 1983, File Reference W3-QAIRC-409.
4. Extracts from QAI-9, Revision 0, October 31, 1979; and Revision 2, April 20, 1983.
5. Extracts from QAI-9A, Revision 0, September 21, 1982.
6. QAI-9A, QAIRGS 48-1, EBASCO Force Account (Concrete Structures).
7. QAI-9A, QAIRGS 48-2, EBASCO Force Account (Steel Structures).
8. QAI-9, QAIRGS 48-3, QAIRC - Concrete Structures.
9. EBASCO Interoffice Correspondence, Hill to Czyako, June 6, 1983.
10. QAI-9, Revision 2, April 20, 1983.
11. EBASCO Construction Installation Records Review Transmittal Log.

Statement Prepared By:

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Team Leader

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Site Team Leader(s)

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Document Name:  
SSER A-141

Requestor's ID:  
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Author's Name:

Document Comments:  
comm from displaywriter 5/29/84

SSER

Task: Allegation A-141

Reference No.: 4-84-A-06-36

Characterization: It is alleged that EBASCO discrepancy notices (DNs) written during a review of 70 out of 1200 J. A. Jones concrete placement packages were listed on a log, and that the log was required to be maintained by EBASCO instruction QA 9-IA. The alleged expressed concern as to whether these DNs were considered in the quality assurance (QA) review of the concrete placement packages.

Assessment of Allegation: The NRC staff determined that no EBASCO QA procedure or instruction designated QA 9-IA existed. The staff believed that EBASCO Procedure QAI-9A and its supplement, QAIRGs No. 48-1, QAI-9A, were the instructions referred to by the alleged. The NRC staff found that these instructions had been voided and replaced by QAI-9, Revision 2. Revision 2 was in existence when the 70 J. A. Jones concrete placement packages were reviewed by the EBASCO Quality Assurance Installation Review Group (QAIRG).

EBASCO Procedure QAI-9A and its supplement, both of which had been voided, contained a form denoted as QAI 9.2 (Form 9.2). QAI-9, Revision 2 also contained this form. Form 9.2 provided for creation of a log on which each document and item number was identified, and on which were recorded the results of QAIRG reviews conducted for completeness, accuracy, and legibility. The NRC staff noted that the log pertained to deficiency reports (DRs), not to deficiency notices (DNs) as alleged. Consequently, the NRC staff did not attempt to locate DNs, but instead attempted to locate DRs issued by EBASCO QAIRG which should have been in EBASCO's QA records.

In reviewing EBASCO QAIRG records, the NRC staff did not locate the DRs. However, the staff did discover internal correspondence indicating that, prior to the date of this allegation, two EBASCO QAIRG reviews in the area of Civil Quality Assurance Concrete Documentation had been performed. This

correspondence in the records was the only indication that reviews of the 70 concrete placement packages had been performed as alleged; the staff searched EBASCO QA records but found no reference to the two EBASCO QAIRG reviews, and no documentation on which specific concrete placement packages had been reviewed.

Based on the reference in the EBASCO internal correspondence to the two QAIRG reviews, the NRC staff contacted personnel identified by the alleged as having knowledge of "the log." From these interviews, the staff still could not discover the whereabouts of the log or DRs. However a former EBASCO project quality assurance manager (PQAM) indicated that the first QAIRG review was a preliminary review of the J. A. Jones concrete placement packages under Procedure QAI-9. The PQAM related to the NRC staff that, because the preliminary review resulted in the decision to perform a 100% re-review, the records initially generated by the QAIRG were "nullified." Additionally, an EBASCO QA engineer told the NRC staff that he had contacted two former EBASCO employees who had been part of QAIRG's preliminary review; they had told him that, "to the best of their recollection," there had not been any DRs "written under QAI-9.2" (apparently meaning on Form 9.2).

The NRC staff also learned during the interviews that a second review by QAIRG, which was to have addressed the fuel handling building, should have been documented on Form 9.2 in accordance with Procedure QAI-9, Revision 2. The NRC staff, reviewing EBASCO records, was able to locate only a transmittal log which listed activities such as concrete placement numbers and which included a check-off column with the heading "9.2, Yes or No." The NRC staff did not believe this to be the specific log referred to by the alleged, but did note that the log linked some of the alleged's concerns with concrete placement packages and Form 9.2. The transmittal log referenced some concrete placement packages reviewed by QAIRG; the NRC staff sampled three of these packages but found no information, data sheets, or other logs related to Procedure QAI-9A or its supplement (both previously voided), or to the current QAI-9, Revision 2.

In assessing this allegation, which included a review of EBASCO records and interviews with EBASCO personnel, the staff was unable to identify the 70 J. A. Jones concrete placement packages which the QAIRG had reviewed (referred to by the allegor), was unable to locate any EBASCO "log" of deficiencies under EBASCO Procedure QAI-9 or QAI-9A (incorrectly referred to as QA 9-IA in the allegation), and was unable to locate any EBASCO DRs (referred to as DNs by the allegor).

The NRC staff did, however, confirm that EBASCO had performed a 100% re-review of concrete placement packages after the QAIRG review of the first 70 packages. The NRC staff learned that the allegor was not aware of EBASCO's 100% re-review. Also, EBASCO re-reviewed all the DNs; as a result, nonconformance reports (NCRs) were generated and were correctly dispositioned. The NRC staff also reviewed another sample of concrete placement packages, and reviewed EBASCO's disposition of the DNs and NCRs. The NRC staff's review of the concrete placement packages indicated only minor discrepancies (see Allegation A-109); EBASCO's records of their 100% re-review were found to be acceptable (see Allegation A-112/A-131/A-269).

Based on the NRC staff's own review of a sample of concrete placement packages, EBASCO records were found adequate. However, the staff cannot verify that the deficiencies found in the initial review of 70 concrete placement packages (referred to by the allegor) were included in the deficiencies resulting from the 100% re-review. The NRC staff believes this is an indication of missing QA records, and has referred this information to the NRC Office of Investigations (OI).

This specific allegation has neither safety significance nor generic implications. However, this conclusion is contingent upon the results of investigations being conducted by OI, and further technical evaluations may be necessary depending on the outcome of these investigations.

[Potential Violations: None.]

Actions Required: None.

References

1. EBASCO Interoffice Correspondence, J. D. Davis to M. Burgard, "Evaluation of Civil/Structural Documentation stored in the QA Record Vault," December 9, 1982 (A-113).
2. Letter from R. S. Leddick, LP&L, to D. G. Eisenhut, NRC (Response to Question 2), April 27, 1984.
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8. QAI-9, QAIRGS 48-3, QAIRC - Concrete Structures.
9. EBASCO Interoffice Correspondence, Hill to Czyako, June 6, 1983.
10. QAI-9, Revision 2, April 20, 1983.
11. EBASCO Construction Installation Records Review Transmittal Log.

Statement Prepared By:	_____	_____
	S. Kim	Date
Reviewed By:	_____	_____
	Team Leader	Date
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Document Name:  
SSER A-141

Requestor's ID:  
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Author's Name:

Document Comments:  
comm from displaywriter 5/29/84

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4-84-A-06-36

Task: Allegation A-141

Reference No.: 4-84-A-06-36

Characterization: It is alleged that EBASCO discrepancy notices (DNs) written during a review of 70 out of 1200 J. A. Jones concrete placement packages were listed on a log, and that the log was required to be maintained by EBASCO instruction QA 9-IA. The allegor expressed concern as to whether these DNs were considered in the quality assurance (QA) review of the concrete placement packages.

Assessment of Allegation: The NRC staff determined that no EBASCO QA procedure or instruction designated QA 9-IA existed. The staff believed that EBASCO Procedure QAI-9A and its supplement, QAIRGs No. 48-1, QAI-9A, were the instructions referred to by the allegor. The NRC staff found that these instructions had been voided and replaced by QAI-9, Revision 2. Revision 2 was in existence when the 70 J. A. Jones concrete placement packages were reviewed by the EBASCO Quality Assurance Installation Review Group (QAIRG).

EBASCO Procedure QAI-9A and its supplement, both of which had been voided, contained a form denoted as QAI 9.2 (Form 9.2). QAI-9, Revision 2 also contained this form. Form 9.2 provided for creation of a log on which each document and item number was identified, and on which were recorded the results of QAIRG reviews conducted for completeness, accuracy, and legibility. The NRC staff noted that the log pertained to deficiency reports (DRs), not to deficiency notices (DNs) as alleged. Consequently, the NRC staff did not attempt to locate DNs, but instead attempted to locate DRs issued by EBASCO QAIRG which should have been in EBASCO's QA records.

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In assessing this allegation, which included a review of EBASCO records and interviews with EBASCO personnel, the staff was unable to identify the 70 J. A. Jones concrete placement packages which the QAIRG had reviewed (referred to by the allegor), was unable to locate any EBASCO "log" of deficiencies under EBASCO Procedure QAI-9 or QAI-9A (incorrectly referred to as QA 9-IA in the allegation), and was unable to locate any EBASCO DRs (referred to as DNs by the allegor).

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Based on the NRC staff's own review of a sample of concrete placement packages, EBASCO records were found adequate. However, the staff cannot verify that the deficiencies found in the initial review of 70 concrete placement packages (referred to by the allegor) were included in the deficiencies resulting from the 100% re-review. The NRC staff believes this is an indication of missing QA records, and has referred this information to the NRC Office of Investigations (OI).

This specific allegation has neither safety significance nor generic implications. ~~However, this conclusion is contingent upon the results of investigations being conducted by OI, and further technical evaluations may be necessary depending on the outcome of these investigations.~~

[Potential Violations: None.]

Actions Required: None.

References

1. EBASCO Interoffice Correspondence, J. D. Davis to M. Burgard, "Evaluation of Civil/Structural Documentation stored in the QA Record Vault," December 9, 1982 (A-113).
2. Letter from R. S. Leddick, LP&L, to D. G. Eisenhut, NRC (Response to Question 2), April 27, 1984.
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9. EBASCO Interoffice Correspondence, Hill to Czyako, June 6, 1983.
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11. EBASCO Construction Installation Records Review Transmittal Log.

Statement Prepared By:

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S. Kim

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