

SSER

Task: Allegation A-141

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

Characterization: It has been alleged that a listing of discrepancy notices (DNs) written during a review of 70 out of 1200 concrete placement packages were listed on a log. It was also alleged that the log was required to be maintained by instruction QA 9-IA. The allegor has expressed concern as to whether these DNs (written during March through May of 1983) were considered in the quality review.

Assessment of Allegation: The NRC staff determined that no Ebasco procedure on instruction designated QA 9-IA existed. The staff found that Ebasco procedure QAI-9A, issued on September 21, 1982 and the supplement, known as QAIRGs No. 48-1, QAI-9A, issued on November 5, 1982 were probably the documents referred to in the allegation. In addition the NRC staff found that these documents were voided and replaced by QAI-9, Revision 2 on April 20, 1983. These instructions were in existence during the time of the review of the 70 concrete placement packages of the J. A. Jones Construction Company by the Ebasco Quality Assurance Installation Review Group (QAIRG).

Both of these instructions contained a form known as the QAI 9.2 form which basically provided for the creation of a log wherein each document and item number would be identified the results of the review conducted for completeness, accuracy and legibility. The form file was "Quality Assurance Engineering, Construction-Installation Records, Deficiency Report." [Note that the log is for deficiency reports (DRs) and not deficiency notices (DNs) as alleged.]

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PDR ADOCK 05000382
E PDR

Based on this information the NRC staff attempted to locate, not Deficiency Notices, but Deficiency Reports, issued under the QAIRG. From the records, the NRC staff determined that as of the date of these allegations two QAIRG reviews in the area of Civil Quality Assurance Concrete Documentation had been performed.

For the first review by QAIRG, a search of records, including contacts with personnel identified by the allegor as having knowledge of the logs resulted in the discovery of no such logs or deficiency report. The former Ebasco project quality assurance manager indicated that the QAIRG effort had been to perform a preliminary review of the concrete placement packages under the QAI-9 procedure. Since that effort resulted in the decision to complete a 100% review, the NRC staff was told that the record generated by the QAIRG were nullified. Additionally, a quality assurance engineer from Ebasco stated that he had contacted two former Ebasco employees who were part of the QAIRG effort. They stated that to the best of their recollection there had not been any deficiency reports written under QAI-9.2 (apparently meaning on form QAI-9.2).

For the second review by QAIRG which was stated to have addressed the fuel handling building and was to have been documented on Form QAI 9.2 in accordance with QAI-9, the NRC staff was only able to locate a log entitled, Construction Installation Records Review Transmittal log. This listed activities such as concrete placement numbers and a check off column labelled 9.2, yes or no. The NRC staff does not believe this is the specific log described in the allegation, but the log did link some of the allegor's areas of concern between concrete placement packages and the 9.2 form (assumed to be QAI 9.2). When the references for this log to three sample concrete placement packages were checked, no information, data sheets, logs, etc., were found in the placement packages related to QAI-9A or QAI-9.

In summary, the NRC staff was unable to identify the 70 specific concrete placement packages which the QAIRG had reviewed, was unable to locate any log of deficiencies under a QAI-9 or -9A procedure or instruction, and was unable to identify any deficiency reports (referred to as deficiency notices by the allegor).

The NRC staff confirmed, however, that Ebasco performed a complete re-review of the concrete placement after the allegor reviewed the first 70 packages. This re-evaluation included review of all the DNs as well as original placement packages. As a result, NCRs were generated and they were resolved according to the procedure. At the time of allegation, the allegor was not aware of Ebasco's re-evaluation of the packages. The NRC staff also reviewed a sample of concrete placement packages. The review included a review of the disposition of DN and NCRs.

As a result of these facts it would appear that the consideration of any deficiencies noted by the QAIRG effort were utilized only to determine if the review sample indicated satisfactory quality records or not, and in this case the decision was that it was determined that the records were not adequate and the subsequent 100% review began.

Based on the above, the NRC staff concludes that there is no safety significance or generic implications arising from this allegation based on the current information available to the technical staff. The NRC staff review of a series of concrete placement packages indicated only minor discrepancies and represented acceptable records (see Allegations A-109, A-112, A-131, and A-269).

This technical conclusion is contingent on the results of investigations being conducted 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. Interoffice Correspondence of Ebasco from J. D. Davis to M. Burgard, "Evaluation of Civil/Structural Documentation stored in the QA Record Vault," dated December 9, 1982 (A-113).
2. Letter from R. S. Leddick of LP&L to D. G. Eisenhut of NRC (Response to Question 2), dated 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, dated October 31, 1979; and Revision 2, dated April 20, 1983.
5. Extracts from QAI-9A, Revision 0, dated 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, dated June 6, 1983.
10. QAI-9, Revision 2, April 20, 1983.

Statement Prepared By: _____
S. Kim _____
Date _____

Reviewed By: _____
Team Leader _____
Date _____

Reviewed By: _____
Site Team Leader(s) _____
Date _____

Approved By: _____
Task Management _____
Date _____

WATERFORD OPEN ISSUE

Task: A-141

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

Characterization: It has been alleged that a listing of discrepancy notices (DNs) written during a review of 70 out of 1200 concrete placement packages were listed on a log. It was also alleged that the log was required to be maintained by instruction QAI-9. The alleged has expressed concern as to whether these DNs were considered in the quality review.

Initial Assessment of Significance: It is not possible to evaluate the significance of the allegation without knowledge of the types of discrepancies which are noted.

Source: Allegor A, Transcript pages 86-92.

Approach to Resolution:

1. Attempt to locate DN logs made during QAIRP on concrete reviews from November 15, 1982 - July 31, 1983.
2. Interview Robin Shepard, secretary/clerk who had logs on her desk.
3. Interview Peggy Burgard, in whose work trailer the logs were kept.
4. Locate DN's and ascertain their disposition/consideration in the subsequent review and generation of NCR s.
5. Provide an evaluation of the significance of the DN's.

Status:

Review Lead: L. Shao

Support:

Estimated Resources: 2 man days

Estimated Completion: May 25, 1984

CLOSURE:

Document Name:
A-141

Requestor's ID:
CONNIE

Author's Name:

Document Comments:

016
6-14-84
J

Document Name:
SSER A-141

Requestor's ID:
CONNIE

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 has been alleged that a listing of discrepancy notices (DNs) written during a review of 70 out of 1200 concrete placement packages were listed on a log. It was also alleged that the log was required to be maintained by instruction QA 9-IA. The alleger has expressed concern as to whether these DNs (written during March through May of 1983) were considered in the quality review.

Assessment of Allegation: The NRC staff determined that no Ebasco procedure on instruction designated QA 9-IA existed. The staff found that Ebasco procedure QAI-9A, issued on September 21, 1982 and the supplement, known as QAIRGs No. 48-1, QAI-9A, issued on November 5, 1982 were probably the documents referred to in the allegation. In addition the NRC staff found that these documents were voided and replaced by QAI-9, Revision 2 on April 20, 1983. These instructions were in existence during the time of the review of the 70 concrete placement packages of the J. A. Jones Construction Company by the Ebasco Quality Assurance Installation Review Group (QAIRG).

Both of these instructions contained a form known as the QAI 9.2 form which basically provided for the creation of a log wherein each document and item number would be identified the results of the review conducted for completeness, accuracy and legibility. The form file was "Quality Assurance Engineering, Construction-Installation Records, Deficiency Report." [Note that the log is for deficiency reports (DRs) and not deficiency notices (DNs) as alleged.]

Based on this information the NRC staff attempted to locate, not Deficiency Notices, but Deficiency Reports, issued under the QAIRG. From the records, the NRC staff determined that as of the date of these allegations two QAIRG reviews in the area of Civil Quality Assurance Concrete Documentation had been performed.

For the first review by QAIRG, a search of records, including contacts with personnel identified by the allegor as having knowledge of the logs resulted in the discovery of no such logs or deficiency report. The former Ebasco project quality assurance manager indicated that the QAIRG effort had been to perform a preliminary review of the concrete placement packages under the QAI-9 procedure. Since that effort resulted in the decision to complete a 100% review, the NRC staff was told that the record generated by the QAIRG were nullified. Additionally, a quality assurance engineer from Ebasco stated that he had contacted two former Ebasco employees who were part of the QAIRG effort. They stated that to the best of their recollection there had not been any deficiency reports written under QAI-9.2 (apparently meaning on form QAI-9.2).

For the second review by QAIRG which was stated to have addressed the fuel handling building and was to have been documented on Form QAI 9.2 in accordance with QAI-9, the NRC staff was only able to locate a log entitled, Construction Installation Records Review Transmittal log. This listed activities such as concrete placement numbers and a check off column labelled 9.2, yes or no. The NRC staff does not believe this is the specific log described in the allegation, but the log did link some of the allegor's areas of concern between concrete placement packages and the 9.2 form (assumed to be QAI 9.2). When the references for this log to three sample concrete placement packages were checked, no information, data sheets, logs, etc., were found in the placement packages related to QAI-9A or QAI-9.

In summary, the NRC staff was unable to identify the 70 specific concrete placement packages which the QAIRG had reviewed, was unable to locate any log of deficiencies under a QAI-9 or -9A procedure or instruction, and was unable to identify any deficiency reports (referred to as deficiency notices by the alleged).

The NRC staff confirmed, however, that Ebasco performed a complete re-review of the concrete placement after the alleged reviewed the first 70 packages. This re-evaluation included review of all the DNs as well as original placement packages. As a result, NCRs were generated and they were resolved according to the procedure. At the time of allegation, the alleged was not aware of Ebasco's re-evaluation of the packages. The NRC staff also reviewed a sample of concrete placement packages. The review included a review of the disposition of DN and NCRs.

As a result of these facts it would appear that the consideration of any deficiencies noted by the QAIRG effort were utilized only to determine if the review sample indicated satisfactory quality records or not, and in this case the decision was that it was determined that the records were not adequate and the subsequent 100% review began.

Based on the above, the NRC staff concludes that there is no safety significance or generic implications arising from this allegation based on the current information available to the technical staff. The NRC staff review of a series of concrete placement packages indicated only minor discrepancies and represented acceptable records (see Allegations A-109, A-112, A-131, and A-269).

This technical conclusion is contingent on the results of investigations being conducted by the NRC Office of Investigations and further technical evaluations by the NRC staff.

Potential Violations: None.

Actions Required: None.

References

1. Interoffice Correspondence of Ebasco from J. D. Davis to M. Burgard, "Evaluation of Civil/Structural Documentation stored in the QA Record Vault," dated December 9, 1982 (A-113).
2. Letter from R. S. Leddick of LP&L to D. G. Eisenhut of NRC (Response to Question 2), dated 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, dated October 31, 1979; and Revision 2, dated April 20, 1983.
5. Extracts from QAI-9A, Revision 0, dated 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, dated June 6, 1983.
10. QAI-9, Revision 2, April 20, 1983.

Statement Prepared By:

S. Kim

Date

Reviewed By:

Team Leader

Date

Reviewed By:

Site Team Leader(s)

Date

Approved By:

Task Management

Date

SSER

Task: Allegation A-141

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

EBASCO

Characterization: It has been alleged that a listing of discrepancy notices (DNs) written during a review of 70 out of 1200 concrete placement packages were listed on a log. *Q.A. Jones* It was also alleged that the log was required to be maintained by instruction QA 9-IA. The *EBASCO* ~~allegor~~ *found* expressed concern as to whether these DN's ~~written during March through May of 1983~~ were considered in the *QA* quality review.

QA

Assessment of Allegation: *found* The NRC staff *believed* determined that no Ebasco procedure on instruction designated QA 9-IA existed. The staff *found* that Ebasco procedure QAI-9A, ~~issued on September 21, 1982~~ and the supplement, known as QAIRGs No. 48-1, QAI-9A, ~~issued on November 5, 1982~~ were *instructions* ~~probably the documents referred to in the allegation.~~ In addition, the NRC staff *instructions* found that these documents *had been* were voided and replaced by QAI-9, Revision 2, on April 20, 1983. These *Revision 2 was* instructions were in existence *when* during the time of the review of the 70 concrete placement packages *Q.A. Jones* of the J. A. Jones Construction Company *were reviewed* by the Ebasco Quality Assurance Installation Review Group (QAIRG).

EBASCO Form

Procedure QAI-9A and its supplement, both voided, *Revision 2 also included Form 9.2.* Both of these instructions contained a form known as the QAI 9.2 form, which *Form 9.2* basically provided for the creation of a log *on which* wherein each document and item number would be identified, the results of the review conducted for completeness, accuracy, and legibility. The form file was "Quality Assurance Engineering, Construction-Installation Records, Deficiency Report." *The NRC staff* Note that the log *pertained to* for deficiency reports (DRs), *continued* and not deficiency notices (DNs) as alleged.

NO 9

Consequently, ^{attempted to} ~~Based on this information~~ ^{did not} the NRC staff ^{DNA} attempted to locate ^{not} ~~Deficiency~~ Notices, but ^{instead locate the} ~~Deficiency Reports~~, issued under the QAIRG. From the records, ^{from the review of QAIRG records} the NRC staff determined that, as of the date of these allegations, two QAIRG reviews in the area of Civil Quality Assurance Concrete Documentation had been performed. The NRC staff

^{which?} ^{REV 2.2} ^{INTERVIEW} ^{LOG + CALLS} ^{QAIRG records} ^{and big} ^{the staff} ^{and no DR} ^(PGAM) ^{to the NRC staff} ^{Gones} ^{because QAIRG's review} ^{perform} ^{am EBASCO} ^{QA} ^{told the NRC staff} For the first review by QAIRG, a search of records, including contacts with personnel identified by the allegor as having knowledge of the logs, resulted in the discovery of no such logs, or deficiency report. The former Ebasco project quality assurance manager indicated that the QAIRG effort had been to perform a preliminary review of the concrete placement packages under the QAI-9 procedure. Since that effort resulted in the decision to complete a 100% review, the NRC staff was told that the record generated by the QAIRG were "nullified." Additionally, a quality assurance engineer from Ebasco stated that he had contacted two former Ebasco employees who were part of the QAIRG effort; they stated that to the best of their recollection there had not been any deficiency reports written "under QAI-9.2" (apparently meaning on form QAI-9.2).

^{attempted to} ^{The NRC staff} ^{evaluate} For the second review by QAIRG which was stated to have addressed the fuel handling building and was to have been documented on Form QAI 9.2, in accordance with QAI-9, the NRC staff was only able to locate a log entitled, Construction Installation Records Review Transmittal log. This listed activities such as concrete placement numbers and a check-off column labelled "9.2, Yes or No." The NRC staff does not believe this is the specific log referred to described in the allegation, but the log did link some of the allegor's areas of concern between concrete placement packages and the 9.2 form (assumed to be QAI 9.2). When the references for this log to (three sample concrete placement packages) were checked, no information, data sheets, logs, etc., were found in the placement packages related to QAI-9A or QAI-9.

Records
In its initial assessment of the QAIRG reviews, *Q.A. Jones*
In summary, the NRC staff was unable to identify the 70 specific concrete
placement packages which the QAIRG had reviewed, was unable to locate any log
of deficiencies under a QAI-9 or *QAI*-9A procedure or instruction, and was unable
to identify any *EPASCO DRS* deficiency reports (referred to as *DNA* deficiency notices by the
allegor).

later
The NRC staff confirmed, however, that *EPASCO* performed a complete re-review
of the concrete placement *packages* after the *allegor* reviewed the first 70 packages.
EPASCO reviewed This re-evaluation included review of all the DNs as well as original placement
packages; As a result, *nonconformance reports* (NCRs) were generated and they were *correctly dispositioned*
to the procedure. At the time of allegation, the *allegor* was not aware of
EP Ebasco's re-evaluation of the packages. *in light of these facts* The NRC staff also reviewed a sample
of concrete placement packages, and the review included a review of the *EPASCO*
disposition of DN and NCRs.

As a result of these facts it would appear that the consideration of any
deficiencies noted by the QAIRG effort were utilized only to determine if the
review sample indicated satisfactory quality records or not, and in this case
the decision was that it was determined that the records were not adequate and
the subsequent 100% review began.

specific
Based on the above, the NRC staff concludes that there is no safety significance
or generic implications arising from this allegation based on the current
information available to the technical staff. The NRC staff's review of
series of concrete placement packages indicated only minor discrepancies, and
represented acceptable records (see Allegations A-109, A-112, A-131, and A-269).
the staff found the to be acceptable

This technical conclusion is contingent on the results of investigations being
conducted 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.

orig 70, and new info from OI may change results

References

- EPASCO*
1. [^]Interoffice Correspondence, ~~of Ebasco from~~ J. D. Davis to M. Burgard, "Evaluation of Civil/Structural Documentation stored in the QA Record Vault," ~~dated~~ December 9, 1982 (A-113).
 2. Letter from R. S. Leddick, ~~of~~ LP&L, to D. G. Eisenhut, ~~of~~ NRC (Response to Question 2), ~~dated~~ April 27, 1984.
 3. *copy* Ebasco Interoffice Correspondence, Burgard to Stinson, March 28, 1983, File Reference W3-QAIRC-409.
 4. Extracts from QAI-9, Revision 0, ~~date~~ October 31, 1979; and Revision 2, ~~dated~~ April 20, 1983.
 5. Extracts from QAI-9A, Revision 0, ~~dated~~ 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, ~~dated~~ June 6, 1983.
 10. QAI-9, Revision 2, April 20, 1983.
 11. *EPASCO Construction Installation Records Review Transmittal Log*

Statement Prepared By:

S. Kim

Date

Reviewed By:

Team Leader

Date

Reviewed By:

Site Team Leader(s)

Date

Approved By:

Task Management

Date

SSER

Task: Allegation A-141

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

Characterization: It ~~has been~~ alleged that a ~~listing of~~ discrepancy notices (DNs) written during a review of 70 out of 1200 concrete placement packages were listed on a log, ~~It was also alleged~~ that the log was required to be maintained by instruction QA 9-IA. The ~~allegor~~ ^{EPASCO} ~~has~~ expressed concern as to whether these DNs ~~(written during March through May of 1983)~~ were considered in the quality ^{assurance (QA)} review of the concrete placement packages.

Assessment of Allegation: The NRC staff determined that no Ebasco procedure or instruction designated QA 9-IA existed. The staff ^{believed} found that Ebasco [↑] procedure QAI-9A³ ~~issued on September 21, 1982 and~~ ^{its} the supplement, known as QAIRGs No. 48-1, QAI-9A, ~~issued on November 5, 1982~~ ^{instructions} were probably the documents referred to ^{by} in the allegation. In addition ^{the} the NRC staff found that these ^{instructions} documents ^{had been} were voided and replaced by QAI-9, Revision 2, ^{Revision 2 was} on April 20, 1983. These instructions ^{wherein} were in existence during the time of the review of the 70 ^{Q.A. Jones} concrete placement packages of the J. A. Jones Construction Company ^{where furnished} by the Ebasco ^{QPS} Quality Assurance Installation Review Group (QAIRG). QAI-9

Both of these instructions contained a form known as the QAI 9.2 (form which also contained this form). Form 9.2 basically provided for the creation of a log wherein each document and item number was identified and on which were recorded the results of the review conducted for completeness, accuracy and legibility. The form file was "Quality Assurance Engineering, Construction-Installation Records, Deficiency Report." [Note that the log is The NRC staff noted maintained for deficiency reports (DRs) and not deficiency notices (DNs) as alleged.]

CONTINUE Φ

REDRAFT (3) FOR REVIEW.

By TL

INSERT (A) on p. 2

- ⑦ In reviewing EPASCO 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 EPASCO 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; the staff searched EPASCO QA records — but found no reference to the two EPASCO QAIRG reviews, and no documentation on which ^{specific} concrete placement packages had been reviewed.
- as alleged

↓ CONTINUE WITH NEXT ⑧

- ⑧ Based on the reference in the EPASCO internal correspondence to the two QAIRG reviews, the NRC staff

CONTINUE

which should have been on EPASCO's QA records.

- 2 -

attempted to locate DRA

Consequently, ^{did not} Based on this information, the NRC staff attempted to locate ^{DNA, but instead} ~~not~~ Deficiency Notices, but Deficiency Reports, ^{by EPASCO} issued under the QAIRG. From the records, the NRC staff determined that as of the date of these allegations two QAIRG reviews in the area of Civil Quality Assurance Concrete Documentation had been performed. INSERT # A (see back of pg. 1)

For the first review by QAIRG, a search of records, including ^{ed} contacts with personnel identified by the allegor as having knowledge of the logs, ^{From these} resulted in the discovery of no such logs or deficiency report. The former Ebasco project quality assurance manager ^{DRA. However, a} indicated that the QAIRG effort had been to perform a preliminary review of the concrete placement packages under the QAI-9 procedure. ^{the whereabouts of the (PQAM)} Since that effort, ^{first review was a} resulted in the decision to complete a 100% ^{G.A. Jones} review, the NRC staff was told that the record generated by the QAIRG were "nullified." Additionally, ^{an EPASCO QA} a quality assurance engineer ^{told the NRC staff} from Ebasco stated that he had contacted two former Ebasco employees who ^{had been} were part of the QAIRG effort. ^{had told him} They stated that, to the best of their recollection, there had not been any DRA deficiency reports "written under QAI-9.2" (apparently meaning on ^{initially} form ~~QAI-9.2~~ 9.2).

The NRC staff ^{also during their interviews} learned that a ^{Procedure} For the second review by QAIRG, which was ^{should} stated to have addressed the fuel handling building, ^{and was to} have been documented on Form ~~QAI~~ 9.2 in accordance with QAI-9. ^{transmitted} the NRC staff was only able to locate a log entitled, Construction Installation Records Review Transmittal log. This ^{which included} listed activities such as concrete placement numbers and a check-off column ^{with the heading} labelled "9.2, yes or no." The NRC staff ^{did} does not believe this ^{to be} is the specific log ^{referred to by} described in the allegation, but the log ^{did} did link some of the allegor's areas of concern ^{with} between concrete placement packages and the 9.2 form (assumed to be QAI-9.2). ^{The transmittal referenced a} When the references for this log to three sample concrete placement packages ^{the NRC staff sampled three packages but found no other} were checked, no information, data sheets, logs, etc., were found in the placement packages related to QAI-9A or QAI-9, ^{to the current} Revision 2.

reviewed by QAIRG;

Procedure

on its supplement (both previously voided),

transmitted EPASCO records

INSERT (B) on p. 3

- (F) Based on the NRC staff's ^{own} review of a sample of concrete placement packages, EPAS records ~~related to~~ ~~EPAS's 100% re-review of~~ ^{were found} ~~original~~ ^{adequate.} concrete placement packages, ~~the NRC staff~~ concludes that this allegation has neither safety significance nor generic implications. However, the staff cannot verify that the EPAS's 100% ~~re-review~~ ^{deficiencies found in the initial review of} ~~the 70 concrete placement packages (referred to by the allegor)~~ were included in the ~~issuance of the NRC's~~ 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).
- (F) This specific allegation has neither safety significance nor generic implications.

CONTINUE

In assessing this allegation, which included a review of EPASCO records and interviews with personnel,

In summary, the NRC staff was unable to identify the 70 specific concrete placement packages which the QAIRG had reviewed, was unable to locate any log of deficiencies under QAI-9 or -9A procedure or instruction, and was unable to identify any deficiency reports (referred to as deficiency notices by the alleged).

The NRC staff confirmed, however, that Ebasco performed a complete re-review of the concrete placement packages after the QAIRG reviewed the first 70 packages. This re-evaluation included review of all the DNSs as well as original placement packages. As a result, (NCRs) were generated and they were resolved according to the procedure. At the time of allegation, the alleged was not aware of Ebasco's re-evaluation of the packages. The NRC staff also reviewed a sample of concrete placement packages. The review included a review of the disposition of the DN and NCRs.

As a result of these facts it would appear that the consideration of any deficiencies noted by the QAIRG effort were utilized only to determine if the review sample indicated satisfactory quality records or not, and in this case the decision was that it was determined that the records were not adequate and the subsequent 100% review began.

Based on the above, the NRC staff concludes that there is no safety significance or generic implications arising from this allegation based on the current information available to the technical staff. The NRC staff's review of a series of concrete placement packages indicated only minor discrepancies and represented acceptable records (see Allegations A-109, A-112, A-131, and A-269).

This technical conclusion is contingent on the results of investigations being conducted 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

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

Approved By:

Task Management

Date

Document Name:
SSER A-141

REC'D
6/15/84

Requestor's ID:
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Author's Name:

Document Comments:
comm from displaywriter 5/29/84