

SSER

Task: Allegation A-265

Reference Number: 4-84-A-06/147

Characterization: This allegation details a concern that data entries made on instrument tubing support documentation have been altered to reflect the as-built condition in the field.

Assessment of Allegation: Ten Mercury nonconformance reports (NCRs), as supplied by the allegor, were reviewed. Each of the NCRs details discrepancies between the documented heat numbers of instrument tubing supports and the actual support member heat numbers installed in the field.

The disposition of these reports resulted in the inspection documentation being changed to reflect the as-built condition of the support. A review of the hanger/support inspection records, Form 262, confirmed that this had been accomplished. Field examination of the support members verified that heat numbers were as-identified on the inspection records as changed. It was determined that this method of documenting and correcting hardware/document discrepancies was in accordance with program requirements.

The walkdown of Instrument Support Systems revealed installations in which certain attributes did not match those indicated on inspection records. To document this deficiency, nonconformance reports were initiated, identifying specific hardware/documentation discrepancies. For the nonconformances examined, these discrepancies consisted of heat numbers, stamped on the material which did not match the heat numbers shown on the original inspection document. In determining appropriate corrective action, all of the applicable material heat numbers were verified to assure proper material certification and traceability. No problems were identified during this check.

It could not be determined why the original inspection data did not agree with the field installation; however, it was observed that all of the supports identified on the NCRs reviewed had been inspected on approximately the same date, it is therefore considered possible that these discrepancies were a result of an inspector error in transposing data from field notes to the actual inspection report. No additional evidence was found which would indicate that the actual support had been moved or relocated.

The Mercury nonconformance reports reviewed do detail a requirement to change quality assurance records to reflect the as-built condition of instrument tubing supports. However, these changes appear to have been made to assure accuracy of quality assurance documentation which previously contained erroneous data.

This allegation has neither safety significance nor generic implications.

Potential Violations: Violation of Criterion XVII of Appendix B to 10 CFR 50 in that the initial inspection records did not provide evidence of as-built conditions.

Actions Required: None.

References

<u>Support No.</u>	<u>Form 262 HT#</u>	<u>Actual HT#</u>	<u>NCR No.</u>
1305-20	75440	87287	1154
1305-30	811N05270	83438	1156
1305-04	75440	87287	1153
1305-06	87287	75440	1155
1305-07	87287	75440	1157
1305-10	75440	87287	1158
1305-12	75440	87287	1159
1110-10	75440	87287	1162
1269-02	Detail Changes		1163
1305-02	75440	87287	1179

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