

SSER

Task: Allegations A-94 through A-99

Reference No.: 4-83-A-88-4A

Characterization: There are six miscellaneous allegations relating to an unidentified nonconformance report (NCR) dated September 9, 1983, which makes reference to various problems with stainless steel piping and tubing.

Assessment of Allegation: The implied significance of this allegation is that improper reporting and corrective action of NCRs, missing quality assurance (QA) records, lack of access to necessary documentation and key personnel, and the lack of procedures could cause the QA process to be compromised and place the quality of construction in question.

The NRC staff reviewed these six allegations as follows:

1. Allegation A-94 - It was alleged that an individual had on file an unnumbered NCR and complete documentation on how EBASCO would not allow people to report problems. A copy of the NCR was obtained from LP&L and was identified as EBASCO NCR No. W3-6943. This NCR therefore had been properly entered into the EBASCO system.
2. Allegation A-95 - It was alleged that Attachment 1 of the "unidentified" NCR (W3-6943) states that two heat numbers had been used for three different schedules of pipe tubing. The NCR disposition was to: (1) "...provide a listing of suspect pipe runs..."; (2) "...QC to take UT measurements on suspected runs..."; and (3) "...evaluate any deficiencies reported by QC..." The purpose of this inspection was to determine if the proper schedule of material had been installed. The results of the UT inspection revealed that schedule 160 piping had been installed in the appropriate systems. This corrective action was acceptable to the NRC staff.
3. Allegation A-96 - It was alleged that Mercury Construction Company took a trailer full of documents to their home office. The removal of the documents was contrary to LP&L's commitment to ANSI N 45.2.9; however, the NRC staff determined that these records had been returned to the site. LP&L provided all Mercury records requested by the NRC staff during this review, even though the records system was cumbersome and retrieval was not always timely.

4. Allegation A-97 - The allegation is that EBASCO reviewers were not allowed access to heat number records and could not research the extent of the problems. Six EBASCO document reviewers were interviewed and all of them stated they had no problem obtaining access to Mercury records. The site QC supervisor of the EBASCO Verification Group stated emphatically that inspectors working for him physically checked tubing for heat numbers upon proper request from the document reviewers. There was no evidence of EBASCO personnel being denied access to Mercury records. Although this allegation may have existed prior to and at the time of the allegation, access was not a current problem and all QA records requested by the NRC staff were available.
5. Allegation A-98 - The allegation is that Mercury Authorized Nuclear Inspectors (ANIs) were off limits to reviewers. The six EBASCO document reviewers interviewed, who were on site at the time of this allegation, agreed they had ready access to Mercury ANIs. There was no objective evidence that the reviewers were denied access to the ANIs, although this situation may have existed prior to or during the allegation. Mercury ANIs were not available on site to be interviewed by the NRC staff.
6. Allegation A-98 - The allegation is that there are no procedures for review of documents. The NRC staff reviewed the following procedures and found them to be adequate for review of documents: EBASCO Procedure QAI No. 9, "Review and Handling of Construction-Installation Records," original issue dated October 31, 1979, current revision issued April 20, 1983; EBASCO Procedure QAI No. 9A, "Documentation Statusing Review Instruction," dated December 13, 1982; Tompkins-Beckwith Procedure TBP-2C, "QA Records Turnover," dated February 7, 1983; and Mercury Company Procedure QPC-3010, "Quality Assurance Records Control," original issue dated September 7, 1978, current revision issued November 1, 1978. Although the use of supplemental procedures related to a particular contractor could be a improvement over the base procedure, the base procedure (QAI-9) was deemed adequate.

Additionally, contractors' documentation packages were reviewed by the NRC staff and generally found acceptable; see Allegations A-143, A-150, A-162, and A-163.

The NRC staff has determined that these six allegations had neither safety significance nor generic implications.

[Potential Violations: None.]

[Actions Required: None.]

References:

1. EBASCO Procedure QAI No. 9, "Review and Handling of Construction-Installation Records," dated October 29, 1979 and all subsequent revisions.
2. EBASCO Procedure QAI No. 9a, "Documentation Statusing Review Instructions," dated December 13, 1982.
3. Tompkins-Beckwith Procedure TBP-20, "QA Records Turnover," dated February 7, 1983.
4. Mercury Company Procedure No. QPC-3010, "Quality Assurance Records Control," dated November 1, 1978.
5. EBASCO NCR W3-6943.

Statement Prepared By:

D. L. Summers
Date

Reviewed By:

Team Leader
Date

Reviewed By:

Site Team Leader(s)
Date

Approved By:

Task Management
Date