

SSER

Task: Allegation A-170

Reference No.: 4-84-A-06-65

Characterization: It is alleged that an EBASCO discrepancy notice (DN) was not properly dispositioned for missing reinforcing steel in the fuel handling building (FHB) during an incident in which two EBASCO inspectors were told to leave the placement site, and that EBASCO may have lacked a procedure for upgrading engineering discrepancy notices (EDNs) to nonconformance reports (NCRs).

Assessment of Allegation: In assessing this allegation, the NRC staff found that an EBASCO QA inspector had noticed that reinforcing steel in the FHB was missing during a preplacement inspection and had issued a field change request prior to the placement of concrete to correct the deficiency. The allegor was apparently not aware of these corrective measures. Prior to this corrective action, the EBASCO field engineer mistakenly approved the pre-placement package and, because of this signature, J. A. Jones and EBASCO supervision informed the EBASCO inspector and area engineer (who wanted to re-inspect the missing reinforcing steel) that the placement had already been authorized and that no further inspection was necessary. As alleged, the inspectors were told to leave the site. However, the EBASCO QA engineer wrote a DN describing what happened, and it was this DN that finally resulted in the reinforcing steel being installed prior to concrete placement.

After examining the EBASCO procedure for handling EDNs, the NRC staff found that it does require that EDNs be upgraded to NCRs when an EDN is safety related. Furthermore, a staff review of 120 EDNs revealed that several were upgraded to NCRs. The staff therefore concluded that the use of the EDN had been adequate in the civil-structural discipline.

The implied significance of this allegation is that EBASCO DNs and EDNs were not receiving proper management evaluation and that EDNs were being used to avoid NCRs. The NRC staff found one instance of an initial oversight that was

subsequently corrected when the EBASCO QA engineer wrote a DN to ensure installation of the missing reinforcing steel. The staff found in the civil-structural discipline no examples of EDNs that should have been upgraded to NCRs and were not. Also found were examples of EDNs that had been properly upgraded to NCRs, thus indicating that EBASCO procedures were functioning as intended. Accordingly, this allegation has neither safety significance nor generic implications.

Potential Violation: None.

Action Required: None.

References

1. EBASCO procedure for handling of EDNs, ASP-IV-70, Issue D, March 5, 1984.
2. Waterford-3 DN Number EC-071, "Chipping of Concrete Beneath Base Plates," May 6, 1981.
3. Waterford-3 DN Number EC-1961 "Cable to Cable Separation," April 15, 1984.
4. Waterford-3 DN Number EC-371, "Exterior Concrete Wall Placement 593-S03-1A and 1AA," September 2, 1977.
5. Waterford 3 DN Number EC-372, "Missing Reinforcement Bars in Exterior Wall Placement 593-S03-1A and 1AA," September 2, 1977.
6. EBASCO FCR Number FCR-CH-761, September 2, 1977.
7. Waterford-3 Concrete Preplacement Checklist Record, Number 593-S03-1A and 1AA, September 6, 1977.

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