

SSER

Task: Allegation A-23b

Reference No.: 4-83-A-81 (A4b)

Characterization: It is alleged that the piping installation procedures of Tompkins-Beckwith, Inc. (T-B) did not contain provisions to assure that supports and hangers were maintained in the design-verified condition, and that as a consequence, hanger removals or modifications may have been made without conformance to an approved procedure. It is also alleged that T-B audits were not planned.

Assessment of Allegation: In evaluating this allegation, the NRC staff reviewed applicable documents and inspected samples of piping installations. Piping systems involved included ASME Code Classes 1, 2, and 3, which are all seismic Category I systems.

In May 1982, LP&L piping system audit reports identified discrepancies between actual hanger installations and design requirements. As a result, LP&L issued Nonconformance Report (NCR) W3-4010 on June 28, 1982, and Potentially Reportable Deficiency (PRD) 84 on July 1, 1982, notifying NRC on July 1, 1982. On August 2, 1982, PRD 84 was final-evaluated and upgraded to Significant Construction Deficiency (SCD) 60, and NRC was so notified. Interim reports have been submitted by LP&L to NRC, apprising them of progress leading to a planned closeout of the issue in the second quarter of 1984.

NRC Inspection Report 50-382/82-14 (December 6, 1982) identified the deficiencies involving SCD 60 as representing a partial breakdown in LP&L's quality assurance (QA) program as it relates to QA/QC reviews of T-B supports and hangers by EBASCO and T-B QA/QC. The NRC subsequently issued a civil penalty related to this issue.

LP&L took prompt and extensive action to identify and correct these problems. Key steps in LP&L's corrective actions include:

1. Training T-B hanger engineering personnel.
2. Training T-B QC inspectors.
3. Having T-B QC and Engineering reinspect 4,400± hangers installed prior to July 6, 1982.
4. Having T-B QA audit reinspections and inspections.
5. Having T-B document deficiencies under NCR W3-4010.
6. Training EBASCO QA support and restraint documentation package reviewers.
7. Having T-B, with EBASCO support, review documentation packages prior to submittal to EBASCO.

8. Having EBASCO QA review and approve documentation packages prior to transferring them to LP&L.
9. Having LP&L QA review documentation packages.

With the identification of discrepancies between as-built piping hanger conditions and the associated design drawings, LP&L instituted a corrective action program. The NRC staff believes that the allegation may have been based on the limited knowledge available to the alleged at the time of the 1982 LP&L audit of piping documentation packages.

LP&L has taken corrective action to close out identified discrepancies associated with the allegation.

Requirements for and accomplishment of LP&L audits were reviewed by the NRC staff, LP&L, EBASCO, and T-B. QA manuals and their implementing procedures for each of these organizations have continually required the performance of scheduled and unannounced audits since the commencement of their Waterford activities. Both onsite and offsite audit teams have been utilized over the years to perform the required audits of QA programmatic and hardware-oriented requirements. The implementation of audit programs at the Waterford Site is addressed in Allegation A-48.

This issue has neither safety significance nor generic implications.

Potential Violations: None.] 4

Actions Required: None.

References:

Tompkins-Beckwith
 QA Manual (March 15, 1983)
 Procedure TBP-8, QA Audits
 Procedure TBP-24, Hanger and Support Installation
 Procedure TBP-41, NDE
 Records Packages SIRR-1246
 CHRR-437
 SISH-1150

LP&L
 SAR Table 3.2-1
 Significant Construction Deficiency 60 (August 6, 1982)
 Interim Reports on SCD 60
 Audit Reports 82-38, -39, and -40 (Toups)
 April 8, 1983 LP&L response letter to Civil Penalty, enclosing payment

EBASCO
 Contract W3-NY-11
 QA Manual

NCR W3-4010 (June 28, 1982 - February 28, 1984)
NCR W3-4504 (September 10, 1982 - December 13, 1983)

January 18, 1984, Letter LW3-80-84 to LP&L Re Bulletin 79-14

NRC
Region IV Inspection Report 82-14 (December 6, 1984)
Civil Penalty Notifications to LP&L (December 6, 1982, and March 16, 1983)

Statement Prepared By: James D. Lenardson
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Denny Crutchfield		<i>[Signature]</i>		
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NRC ~~issued~~ Inspection Report 50-382/82-14 on (December 6, 1982) to LP&L, covering the period May 16 to July 15, 1982. This report identified the deficiencies involving SCD 60 as representing a partial breakdown in LP&L's quality assurance (QA) program as it relates to QA/QC reviews of T-B supports and hangers by EBASCO and T-B QA/QC. LP&L took prompt and extensive action to identify and correct these problems.

The NRC subsequently issued a civil penalty related to this issue

Coincident with the NRC inspection report, the NRC issued on December 6, 1982 a Notice of Violation and Proposed Civil Penalty to LP&L. The Notice evaluated the deficiencies as a Severity Level III violation. The NRC Order Imposing a Civil Monetary Penalty was issued to LP&L on March 16, 1983; LP&L paid the civil penalty in April 1983.

Key steps in LP&L's corrective actions include:

1. Training T-B hanger engineering personnel.
2. Training T-B QC inspectors.
3. Having T-B QC and Engineering reinspect 4,400± hangers installed prior to July 6, 1982.
4. Having T-B QA audit reinspections and inspections.
5. Having T-B document deficiencies under NCR W3-4010.
6. Training EBASCO QA support and restraint documentation package reviewers.
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This issue has neither safety significance nor generic implications.

[Potential Violations: None.] 4

Actions Required: None.

References

Tompkins-Beckwith

QA Manual (March 15, 1983)
Procedure TBP-8, QA Audits
Procedure TBP-24, Hanger and Support Installation
Procedure TBP-41, NDE
Records Packages SIRR-1246
CHRR-437
SISH-1150

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EBASCO

Contract W3-NY-11

QA Manual

NCR W3-4010 (June 28, 1982 - February 28, 1984)

NCR W3-4504 (September 10, 1982 - December 13, 1983)

January 18, 1984 Letter LW3-80-84 to LP&L Re Bulletin 79-14

NRC

Region IV Inspection Report 82-14 (December 6, 1984)

Civil Penalty Notifications to LP&L (December 6, 1982 and March 16, 1983)

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