

SSER

Task: Allegations A-18 and A-164

Reference No.: 4-83-A-74/6, 4-84-A-06/59

Characterization: It is alleged that, due to Ebasco's inadequate nonconformance control, six nonconformance reports (NCRs) were found with no numbers, e.g., not included in the NCR system.

Assessment of Allegation: The implied significance is that improper use of the NCR system could result in lack of reporting of nonconforming conditions, lack of timely corrective action, trending, and improper reportability review, as required by 10 CFR 50.55(e). Therefore, the quality of installed safety-related systems could be questionable. *correction of nonconforming conditions*

The NRC staff evaluated Ebasco's procedures for processing nonconformances to determine the control maintained and the methods used to generate NCRs. The staff also reviewed other, similar allegations and attempted to determine overall which unnumbered NCRs were not entered into the system. Regarding the unnumbered NCRs, the NRC staff attempted to determine if they had been entered into the system and if they had been properly dispositioned and closed. *side allegation A-53*

The allegation referred to six missing Ebasco NCRs without numbers (and not in the NCR system): These NCRs were related to Fischbach & Moore tension test problems related to expansion anchors. However, the NRC staff found seven unnumbered NCRs; the staff relayed this information to LP&L for their action, and on February 15, 1984, LP&L provided a response, which stated that the original six nonconformance conditions had been addressed on Ebasco NCR W3-7533. The NRC staff review of LP&L's response disclosed that only four of the seven unnumbered NCRs were actually captured in W3-7533; the three missing NCRs were found to have been previously documented on Ebasco NCRs W3-7183, W3-7179, and W3-7561. LP&L also informed the NRC staff that additional problems with tension testing had been entered as Ebasco NCRs W3-7184, W3-7182, W3-7180, W3-7140, W3-7138, W3-7177, and W3-7139. The NRC staff reviewed the status of all of these NCRs and found them closed except for W3-7533, W3-7179, and W3-7140.

Additionally, the NRC staff looked for other missing Ebasco NCRs and found that the following "voided" (missing) NCRs were not in the card index or in the QA vault: W3-27, W3-814, W3-859, W3-981, W3-1053, W3-1102, W3-1109, W3-1228, W3-1349, and W3-1438. The staff discovered that NCR W3-1215 was in the QA vault but was not in the NCR card index file.

Overall the NRC staff's review disclosed that there were open NCRs with incomplete corrective action, which could result in performance *signify* unacceptable status of safety-related systems. The staff could not review missing, "voided" NCRs; therefore, questions remain concerning acceptability of installed safety systems. Therefore, the safety significance of this allegation could not be determined, and the NRC staff believes this allegation has generic implications.

*problems identified with Ebasco and Fischbach & Moore. Additionally, allegation A-48 identifies the same problem with Merritt, Cushman, and other site contractors.*

*what's the basis for this?*

See  
question 13  
of June 13, 1984  
Letter from D. Eberhart  
to J. M. Cain LP&L.

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Potential Violations: The lack of proper and timely closure of NCRs is a violation of 10 CFR 50, Appendix B, Criterion XVI. Also, the destruction of QA records, deemed historical records, is a violation of 10 CFR 50, Appendix B, Criterion XVII.

Actions Required: LP&L shall, prior to fuel load, take the following action:

1. Assure that all existing NCR corrective action is complete, that QA reviews are adequate, and that final closure is accomplished.
2. Obtain all missing, voided NCRs and establish the basis for voiding; e.g., contact present or previous employees and attempt to locate or recreate the NCRs.
3. For NCRs found to still have problems, take appropriate corrective action.

See Item No. 13 of the 6 enclosure to the D Eberhart  
Letter of 6/13/84 to J M. Cain (LP&L).

References

1. 10 CFR 50, Appendix B, Criterion XVI.
2. 10 CFR 50, Appendix B, Criterion XVII.
3. ANSI N45.2, QA Program Requirements for Nuclear Facilities.
4. Ebasco Procedure ASP-III-7, Processing of Nonconformances.
5. Ebasco Quality Assurance Instruction (QAI) 31, Processing of Nonconformance Reports.
6. Ebasco Quality Assurance Instruction (QAI) 19, Processing of Discrepancy Notices (DNs) and Engineering Discrepancy Notices (EDNs).

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*Reviewed by Harrison 6/25*

*Re type & Re-write*

*I seriously question  
why these can't be  
tied together.*

*Agree [Signature] 6/22*

*OK  
Rev  
D. Christensen  
JH*