

SSER

Task: Allegations A-283; A-181

Reference No.: 4-84-A-06-165; 4-84-A-06/76

Characterization: The allegation is that the process for initiating NCRs was discouraging.

Assessment of Allegation: The implied significance of this allegation is that the lack of processing due to the impediments in the NCR process may have prevented adequate identification and timely corrective action on nonconformances and that consequently the installations may be questionable.

The NRC staff reviewed this allegation in conjunction with Allegations A-49 and A-123 using the following methodology: 1) Evaluated EBASCO procedures which were used to control nonconformances; and 2) Evaluated related correspondence and LP&L responses to that correspondence.

EBASCO Procedures

The NRC staff reviewed the EBASCO procedures that address NCRs and found that both the 1978 and subsequent 1984 revisions provided complex instructions for the initiation and processing of nonconformances and discrepancies. These instructions may by the nature of their complexity, discourage some individuals from going through the process of initiating nonconformances or discrepancies. The procedure although complex was found by the NRC staff to be an acceptable one.

Related Correspondence

Selected correspondence on this subject was reviewed but conclusive substantiation of this allegation could not be made.

Based on this assessment and other reviews on this subject, the NRC staff concludes that this allegation has neither safety significance nor generic implications.

Potential Violations: None.

Actions Required: None.

## References

1. EBASCO Procedures:  
ASP-III-7 "Corrective Action", "F" issue dated September 20, 1978.  
ASP-III-7 "Processing of Nonconformances", "K" issue dated March 7, 1984.
2. LP&L letter to EBASCO W3-K84-0962 dated April 27, 1984.

Statement Prepared By: J. Whittemore                      Date                     

Reviewed By: \_\_\_\_\_  
Team Leader \_\_\_\_\_ Date \_\_\_\_\_

Reviewed By: \_\_\_\_\_  
Site Team Leader(s) \_\_\_\_\_ Date \_\_\_\_\_

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Actions Required: None.

However, it should be noted that the NRC did identify several problems with the NCR system and its implementation (see allegations A-18, A-33, A-302, and A-232). Additionally, GP&L initiated an exit interview process to identify employee concerns in January 1984. Although this system was identified by the <sup>NRC</sup> ATASK Force to have some deficiencies (Eisenhart letter to Cain 6/13/84) the system when properly implemented, should help resolve ~~this~~ this type of an employee concern.

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