

REVISION 1  
07/10/84

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 alleged was apparently not aware of these corrective measures.~~ Prior to this corrective action, the EBASCO field engineer mistakenly approved the preplacement package and, because of this signature, J. A. Jones and EBASCO supervision informed the EBASCO inspector and area engineer (who wanted to reinspect 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.

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E PDR

I don't believe there was  
any major confrontation  
in this case, especially  
since [Cochran] went back  
and wrote to D.N. He was  
not going to be intimidated.  
Sherman 8/15/84

? missed the  
point!

Ret

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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Author's Name:  
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5/24 J. See Denny's Question  
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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. This NCR is also identified on Allegation A-250.
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 <sup>was</sup> 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 ~~has~~ determined that these records have ~~now~~ been returned to the site. Mercury provided all 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 <sup>23</sup> emphatically that inspectors working for him physically check tubing for

*available?*

heat number upon proper request from the document reviewers. There <sup>was</sup> ~~is~~ no objective 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 QA records were acceptable, *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~~ <sup>was</sup> on site at the time of this allegation, agreed they had ready access to Mercury ANIs. There ~~is~~ <sup>was</sup> 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-20, "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.

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 have 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 April 20, 1983.
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.

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Task No.: Allegation A-128d, A-212, A-275

Reference No.: 4-84-A-06/23d; 4-84-A-06/100; 4-84-A-06/157

Characterization: It is alleged in newspaper article of January 14, 1984 that there were undersized welds in work performed by the Mercury Construction Company.

Assessment of the Allegation: In its review of records, the NRC staff learned that undersized welds had been discovered by LP&L in Mercury socket weld fittings. Upon their discovery, LP&L issued Significant Construction Deficiency (SCD) ~~No.~~ 62, "Undersized welds on  $\frac{1}{2}$ " schedule 160 pipe." Resolution of this SCD was controlled by <sup>SAP</sup>EBASCO NCRs W3-4410, Revision 1; W3-4365; and W3-4366.

According to the ASME Code, the size of a weld is determined by the wall thickness of piping or tubing. The reason Mercury gave for the deficient welding and inspection was that both were based on criteria for  $\frac{1}{2}$ " stainless tubing with a thinner wall thickness of 0.065", rather than for the Schedule 160 piping installed, which has a wall thickness of 0.188". A large share of Mercury's work involved the installation of the thinner tubing. The tubing required a 1/8" fillet weld rather than the 1/4" fillet required for Schedule 160 pipe. The SCD and NCRs resulted in a reinspection and rewelding of doubtful welds by Mercury. The rewelds were reinspected by LP&L and found adequate. SCD ~~No.~~ 62 was reported to the NRC in accordance with 10 CFR 50.55(e) requirements. The NRC staff reviewed and concurred in the need for SCD ~~No.~~ 62.

In assessing this allegation, the NRC staff visually inspected portions of 20 systems welded by Mercury and found unacceptable welds in tubing or support welding. Based on its review of the records and on a visual inspection of accessible portions of 20 systems, the staff believe that the allegation has neither safety significance nor generic implications. It may have been a concern at some time prior to the issuance of Significant Construction

no  
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Deficiency Report No. 62. Normal QA controls wereadequate to recognize and correct the problem. The NRC staff have discussed their findings with the allegor and he agreed and expressed satisfaction with our efforts and conclusions.

[ Potential Violation: None. ]

Action Required: None.

References

1. Significant Construction Deficiency No. 62.
2. NCR W3-4410.
3. NCR W3-4365.
4. NCR W3-4366.
5. List of systems inspected.

Prepared by:

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