

Pg 2
Pg 8

SSER

Task: Allegation A-33; A-55; A-56; A-61b; A-61c; A-61d; A-61e; A-67;
A-68; A-69; A-70; A-71; A-73; A-74; A-75; A-221; A-306 v&w; A-309; A-310;
A-329

Reference No.: 4-83-A-81/B7; 4-83-A-88/7, 8, 13; 4-84-A-06/109, 185v, 185w;
4-84-A-12/1, 2, 19, 185v, 185w; 4-84-A-06

Characterization: The allegation is that EBASCO nonconformance reports (NCR) were not entered into the NCR system, were improperly dispositioned and closed without substantiating evidence, and that a questionable trending problem was being utilized.

Assessment of Allegation: The implied safety significance is that improperly dispositioned NCRs could place the quality of installation in question, and a questionable trending program could cause uncorrected problems in the QA program to continue undetected.

The NRC staff conducting a review of selected EBASCO quality assurance (QA) vault and the NCR tracking system. The selected NCRs were reviewed for content, compliance to procedures, accuracy, completeness of the disposition and final closure. The staff disclosed that 34 of 89 NCRs (38.2 percent) reviewed were improperly dispositioned.

The NRC staff evaluated EBASCO's NCR trending program. It was found to be adequate and was performing its intended functions.

The issue of NCRs not being properly entered into the EBASCO NCR system was addressed in detail in Allegations A-18, A-53, and A-283.

The following is a summary of the NRC staff review of EBASCO NCRs that contained questionable dispositions:

EBASCO W3 NCRs

NCR 7139 - This NCR involved field inspection for the horizontal seismic supports for Radiation Monitors RE-HV 5028S, RE-HV 5028S, RE-HV 5031S, and RE-HV 0200.65. Only the data for the RE-HV 5031S support was the correct attachment (see Attachment No. 2 of NCR). LP&L reopened NCR and corrected seismic support identification problem (see Attachment No. 4 of NCR). The NRC staff identified this problem and LP&L took action which was acceptable to the staff.

NCR-3912 - Involved no 23J-2 type supports discovered during walkdown for which the fit-up inspection was by-passed. The original NCR disposition failed to address the actions required to prevent the reuse of the items. Attachment No. 14 of this NCR identified this issue which was resolved by stating "it was not required for the disposition of this NRC..." No other NCR was reopened or referenced to resolve the issue.

NCR-5565 - Identified that a QA inspector trainee signed off on the fuel handling building (FHB) crane quality verification (QV) inspections. the NCR called for a complete reinspection. There are no documents attached to this NCR showing a reinspection was performed. The NCR states "...corrective action per Attachment #4..." but there was no Attachment No. 4 to the NCR package.

NCR-5563 - Identified that a QA inspector trainee dispositioned NCR No. W3-1728 for J. A. Jones QV Department. This in violation of the requirements of ANSI N45.2.6. The inspections in question were signed off on August 27, August 28, and November 6, 1979, and then by a co-signature on February 4, 1983, by a QA inspector who claimed to be present at the first inspection. This co-signature of the inspections in question eliminated the requirement for a reinspection called for in the recommended disposition. The co-signature was applied 3 years and 5 months later. The NRC staff found this to be a questionable disposition of the NCR.

NCR-6159 - A sample inspection of Tubetrack welding identified that prior to July 1982 an unknown quantity of welding was performed using WPS-"B" procedure without backing plates. This NCR raises the question of traceability problems that were not identified and addressed by the NCR. The NRC staff also found that the sample used when tensile testing the welds was questionable. The sample should have been representative of the weakest weld joint in lieu of the strongest (i.e., worst case example should have been used to conduct tests).

NCR-3919 - Was initiated due to a tubing crack discovered during a system hydrostatic test of instrument line PT-RC-0173, system 52A2, Reactor Coolant. This NCR also resulted in Significant Construction Deficiency (SCD) No. 61 being issued. It was determined that the tubing failure was a result of a manufacturing defect (process not metallurgical), and an attempt was made to ascertain that all tubing of this specific heat number was reinspected. Due to the problem associated with traceability (being lost), the corrective action was to reinspect all tubing installations to locate this heat of defective tubing. The reinspection reportedly located all installation locations. The NRC staff review of this NCR revealed that operational control record (OCR) installation packages indicated that approximately 530 ft. more tubing was installed than was received on site. This was also verified by a review of warehouse issuance records. The "Requisition on Warehouse" form had been changed using liquid paper and a subsequent entry had been crossed out with ink.

SCD 61 states that the tubing in question, Heat No. 466023, $\frac{1}{2}$ tubing, was installed in 89 instrument locations. A sample of nine OCR packages for fuel handling building (FHB), reactor containment building (RCB) and reactor auxiliary building (RAB) systems were reviewed to verify where the tubing was in fact installed. The nine packages (10 percent) were randomly selected from the list used to disposition the NCR. Only one OCR package actually reflected that the tubing in question was installed. This was also verified by an NRC staff walkdown. The walkdown on the eight remaining OCRs revealed different heat numbers installed; however, the OCRs were in agreement with these heat numbers.

Therefore, the list used for dispositioning this NCR was invalid; this NCR and SCD 61 were also invalid, as was the testing and disposition.

NCR-6514 * - The problem of traceability for the weld being performed was still in question; not addressed. The NCR also questioned use of some Bergen-Patterson designed supports installed by Mercury without traceability. This problem was also not addressed by referenced attachment.

NCR-3941-RI * - Identified that support number one fit-up inspection was by-passed and the support had been completely welded out with only the welder's ID.

NCR-5819 * - Identified the problem of instrumentation supports being painted prior to final welded visual inspection. Disposition had been to inspect the welds through paint which was unacceptable.

NCR-6221 - Identified that Weld Control records were signed off by an individual who was not a certified Level II inspector. Sign-off was based on Letter of Designation. The NCR disposition referred to the Tompkins-Beckwith (T-B) (April 1, 1980) Quality Manual that was not in effect at the time the Letter of Designation was written (January 8, 1979). Also, a reference given in the Letter of Designation did not allow designee sign-offs and was in effect as of March 15, 1983; the Letter of Designation also failed to meet the requirements of ANSI N45.2.6.

NRC-6511 (Mercury-3336) - Stated that "during final inspection of installed I-Beam for support 1117-114, weld to existing beam 1A was rejected." The NCR only addressed the fact that the maximum gap was violated, but the weld was rejected for: (1) undersize, (2) lack of Fusion, (3) arc strikes, and (4) undercut. Mercury NCR 3336 recommended weld removal and rework. This recommendation was crossed out and only the nonconforming fit-up gap was addressed. There were not records of rework or reinspection, and only copies of Mercury's NCR were attached to EBASCO's NCR.

* These NCRs were closed out by referring to EBASCO letter F-61147E. The problem is that this letter did not close out these or other NCRs.

NCR-4219 (Mercury-614) - Identified a violation of QCP3110.4 paragraph 6. The nonconformance was that the sample system piping had been bent downward causing a low point in the piping. The piping was being forced down by support SLRR-188. QCP-3110.4 stated that "tubing must be properly routed." This disposition stated that "...tubing was re-evaluated after support SLRR-188 and sample line were installed, after completion of Penetration 29 work." There were no records for rework or reinspection to indicate satisfactory reinstallation of supports and sample lines.

NCR-7432 - Identified a problem with concrete preplacement and post-placement documentation. The documentation could not be matched because the identification of the various placements were on different quality control (QC) forms. Also, this NCR was dispositioned by stating "...this problem was addressed on other NCRs and therefore voided..." No specific references were used; therefore, this disposition is unacceptable. Also, a QA engineer approved the recommended disposition and then voided the NCR.

NCR-4137 - Identified material and weld problems on support SLRR-238. This NCR has been closed out but failed to have 3 of 4 required welds on "M" gusset plates completed. This problem was identified during a QA review and a discrepancy notice (DN) was issued for the missing welds. This is an example of improper NCR closure and reopening, and the use of an incorrect reporting system (DN in lieu of NCR).

NCR-4088 (Mercury-491) - This NCR identified numerous discrepancies found during a walkdown performed against drawing 160-T-035-A. There is no documentation that work was accomplished or completed. The only document attached to this NCR was a Quality Control (QC) Report which listed numerous references but none were attached. EBASCO could not locate the referenced documents.

NCR-5974 - Identified a problem with loss of heat number traceability for safety and non-safety grade related materials. This NCR was used to disposition approximately 150 to 200 DNs with "Q" prefix. NRC staff review indicated that in almost all cases loss of heat traceability was deemed acceptable. This NCR's disposition is questionable to the NRC staff. The problem still existed in that safety and non-safety grade material could have been mixed; i.e., there was questionable use of material with no pedigree or the material could have been the incorrect type and grade.

NCR-5564 - Identified the problem of performing the final weld inspection after the weld has been painted. This NCR was closed out referencing an EBASCO letter which stated "the inspection criteria will be without removing paint to inspect for undersize weld and lack of weld material where installation drawing calls for weld material to be deposited by the installer. This disposition is unacceptable because visual inspections also include an examination for welding defects, not just dimensions.

NCR-6786 - Identified that many Mercury NCRs were issued concerning the lack of heat numbers. These NCRs were closed by referencing a generic series of EBASCO NCRs. The EBASCO disposition stated that the possible heat numbers will be documented on the Mercury as-built drawings. This data is not recorded on the as-built drawings, however, the Mercury Company NCRs have been closed. The disposition of this NCR does not address where the required heat numbers were recorded or how traceability was maintained.

NCR-7177 - It was noted that Fischbach and Moore (F&M) violated Procedure QCP-309, 6.3.2.4, that is, they failed to test three additional expansion anchors for every anchor that failed. It was also identified that an uncalibrated pressure gauge was used on the tension tester and tension testers serial numbers were not recorded. The NCR disposition stated that "QCP-309 did not require recording of serial numbers;" this violates ANSI N45.2, Section 13, that requires the traceability of measuring and test equipment to point of usage. F&M should have written an NCR. Inspection Report (IR) 311-06-70 and IR 310-36-43 identified bolt failure due to excessive slippage. Dispositions prescribed by these IRs were in violation of QCP 309, Section 6.3.2.2(d) and 6.4.3.

NCR-7182, NCR-7180, NCR-7181, NCR-7184, NCR-6723 - These NCRs also involve a violation of ANSI N45.2, Section 13 requirements in that QCP 309 did not require the tension testing equipment's serial number, calibration date, and pressure gauge number to be recorded.

NCR-7547 - Noted discrepancies against OCR-1830 and Mercury NCR-0806. The disposition of this NCR is unsatisfactory do to the system passing a hydrostatic test is used as the basis for acceptability of fit-up discrepancy between the union and tubing. This does not take into account the effects of service conditions such as vibration and cyclic loads, and an engineering evaluation was not performed.

NCR-1650 - Ungraded DN No. MC 2128, which identified that the pressure gauge on the anchor bolt tension tester, was found to be out of tolerance reading (+450 psi higher than actual). The NCR disposition was to retest all anchor bolts installed subsequent to the date the tension test was determined to be out of calibration. The question is how was it determined which bolt(s) to retest when QCP 309 did not require the recording of tester serial number, on the previous tests? NCR 1803 also referred to gauges being out of calibration. Also see NCRs 7177, 7182, 7180, 7181, 7184, and 6723.

NCR-6623 - Identified a heat number and signature being falsified. The tubing in question was removed and replaced in accordance with Mercury NCR 3696. The question was what was done to assure that no other heat numbers were falsified by Mercury, and who forged the signature and entered the heat number on QC Material Verification Mechanical Inspection Report? The NCR's disposition did not address the falsification question and the reference to SCD-57 deals only with traceability.

NCR-5586 - Weld Testing Laboratory was not surveyed (audited) and placed on the Approved Vendors List by Mercury prior to welder performance qualification taking place. This item not addressed in the NCR disposition. Also, the statement provided by the test lab that "a Mercury inspector reviewed all tests," is not adequate. Mercury should have had the person(s) who performed this surveillance document this activity.

NCR-6165 - States "...welder R-1 is not qualified to this procedure..." The disposition states, "...Measures taken to preclude recurrence is required..." No objective evidence of this action could be located.

NCR-7099 - Identified improper weld on cabinets 48A and 48B. Numerous problems were noted with this NCR disposition. FCR-IC-P-416, Revision 1, Sk-1, called for a fillet weld where a flare bevel weld was required. There is no documentation to adequately support the NCR disposition. Also, the evaluation of disposition by EBASCO states, "Evaluation indicates that the stresses are low." There is no documentation indicating what stresses were being referred to. In addition, the recommended disposition "that ESSE (EBASCO Site Support Engineering) evaluate the cabinet base metal cracks" was not addressed. Improper weld length could not be achieved because the incorrect sized embed plates were installed and there were bolt holes that had been filled with grout in the areas required to be welded. Weld size and length were not adequately addressed.

NCR-4593 - Disposition inadequate. See A-232 for details.

The NRC staff also discovered that the EBASCO requirement for having the NCR closed within a 20-day period or having an extension granted was consistently violated. The following table is an example of NCRs found to exceed the closure time requirements of ASP-III-7, Section 6.1.3.a:

TABLE OF NCRs NOT MEETING THE 20-DAY ACTION LIMIT

<u>NCR No.</u>	<u>Issue Date</u>	<u>Verification of Disposition Date</u>	<u>Extension Letter Attached (See Notes for Explanation)</u>
W3-6597	07/06/83	11/28/83	No
W3-6950	07/03/83	10/18/83	No
W3-6615	07/27/83	10/25/83	1
W3-6032	04/06/83	10/21/83	2
W3-5713	02/17/83	11/04/83	3
W3-4504/R3	07/08/83	12/03/83	No
W3-5124	11/06/83	09/13/83	4
W3-5063	10/22/82	10/19/83	4
W3-5071	10/22/82	10/19/83	4
W3-5070	10/22/82	02/09/84	4
W3-5074	11/04/82	10/19/83	4
W3-5232	11/08/82	10/13/83	4
W3-5231	11/08/82	03/19/84	4
W3-5398	12/13/82	02/01/84	4

Notes

1. Extension requested on October 6, 1983. Extension granted to October 20, 1983.
2. Extension requested on October 11, 1983, again on October 21, 1983. Extension granted to October 24, 1983.
3. Extension requested September 2, 1983, granted to September 30, 1983.
4. Extension requested on September 2, 1983, granted to September 30, 1983, but NCRs have no indication of this extension or any others.

This 20-day working requirement was removed from the ASP-III-7 procedure with the issuance of change issue "K." Issue "K," Section 6.3.1.a. now states "Monitor the status and required corrective action to assure timely completion." The definition of timely completion needs to be addressed.

The NRC staff also found that the 10 CFR 50.55(e) for evaluation for reportability did not include the proper engineering involvement. The evaluation was generally accomplished by a QA engineer only. ESSE apparently was not involved in the required engineering input.

W3-6530 - Identified a specific problem with EBASCO Letter No. W3-QAIRC-569 dated June 24, 1983, supplied by the alleged. This letter identified a T-B welding processing violation of EBASCO Specification 884-75, General Welding Requirements, Section II 6.04, which requires that the first weld pass in nuclear piping service shall be a gas tungsten arc weld (GTAM) process.

shielded

Contrary to this requirement, T-B performed socket welds in carbon steel nuclear piping with a metal arch weld (SMAW) process. NCR No. W3-6530 was issued on July 12, 1983, and was subsequently accepted by EBASCO engineering based upon the welds passing hydrostatic test and liquid penetrant or magnetic particle testing. Based upon this action and the fact that the ASME Code was not violated, the NRC staff concluded that the disposition was satisfactory.

W3-7241 and W3-7218 - The NRC staff reviewed these EBASCO NCRs and found them to be adequately dispositioned and properly closed.

The NRC staff believes NCRs were improperly dispositioned and closed out without corrective action being completed. This allegation has safety significance and generic implications and is indicative improper management controls.

Potential Violations: The lack of proper disposition of NCRs and completion of the corrective action is a violation of 10 CFR 50, Appendix B, Criterion XVI.] 4

Action Required: See Item No. 6 in the enclosure to D. Eisenhut letter of June 13, 1984, to J. M. Cain (LP&L).

References:

1. EBASCO Procedure ASP-III-7, Processing of Nonconformances Procedures.
2. Interviews with Mr. L. Stinson.
3. Interview with Mr. Pertuit.
4. NCR Card Index.
5. NCR Master Tracking System.
6. EBASCO Interoffice Correspondence W3-CO-017.
7. EBASCO NCRs against N-5 data reports.
8. NCR W3-7170.

Statement Prepared By:

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Reviewed By:

Team Leader
Date

Reviewed By:

Site Team Leader(s)
Date

Approved By:

Task Management
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SSER

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Concrete

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NCR-7182, NCR-7180, NCR-7181, NCR-7184, NCR-6723 - These NCRs also involve a violation of ANSI N45.2, Section 13 requirements in that QCP 309 did not require the tension testing equipment's serial number, calibration date, and pressure gauge number to be recorded.

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NCR-1650 - Ungraded DN No. MC 2128, which identified that the pressure gauge on the anchor bolt tension tester, was found to be out of tolerance reading (+450 psi higher than actual). The NCR disposition was to retest all anchor bolts installed subsequent to the date the tension test was determined to be out of calibration. The question is how was it determined which bolt(s) to retest when QCP 309 did not require the recording of tester serial number, on the previous tests? NCR 1803 also referred to gauges being out of calibration. Also see NCRs 7177, 7182, 7180, 7181, 7184, and 6723.

NCR-6623 - Identified a heat number and signature being falsified. The tubing in question was removed and replaced in accordance with Mercury NCR 3696. The question was what was done to assure that no other heat numbers were falsified by Mercury, and who forged the signature and entered the heat number on QC Material Verification Mechanical Inspection Report? The NCR's disposition did not address the falsification question and the reference to SCD-57 deals only with traceability.

NCR-5586 - Weld Testing Laboratory was not surveyed (audited) and placed on the Approved Vendors List by Mercury prior to welder performance qualification taking place. This item not addressed in disposition. Also, the statement provided by the test lab that "a Mercury inspector reviewed all tests," is not adequate. Mercury should have had the person(s) who performed this surveillance document the activity.

NCR-6165 - States " . . . welder R-1 is not qualified to this procedure" The disposition states, " . . . Measures taken to preclude recurrence is required" No objective evidence of this action could be located.

NCR-7099 - Identified improper weld on cabinets 48A and 48B. Numerous problems were noted with this NCR disposition. FCR-IC-P-416, Revision 1, Sk-1, called for a fillet weld where a flare bevel weld was required. There is no documentation to adequately support the NCR disposition. Also, the evaluation of

disposition by EBASCO states, "Evaluation indicates that the stresses are low." There is no documentation indicating what stresses were being referred to. In addition, the recommended disposition "that ESSE (EBASCO Site Support Engineering) evaluate the cabinet base metal cracks" was not addressed. Improper weld length could not be achieved because the incorrect sized embed plates were installed and there were bolt holes that had been filled with grout in the areas required to be welded. Weld size and length were not adequately addressed.

NCR-4593 - Disposition inadequate. See A-232 for details.

The NRC staff also discovered that the EBASCO requirement for having the NCR closed within a 20-day period or having an extension granted was consistently violated. The following table is an example of NCRs found to exceed the closure time requirements of ASP-III-7, Section 6.1.3.a:

TABLE OF NCRs NOT MEETING THE 20-DAY ACTION LIMIT

<u>NCR No.</u>	<u>Issue Date</u>	<u>Verification of Disposition Date</u>	<u>Extension Letter Attached (See Notes for Explanation)</u>
W3-6597	7/6/83	11/28/83	No
W3-6950	7/3/83	10/18/83	No
W3-6615	07/27/83	10/25/83	1
W3-6032	04/06/83	10/21/83	2
W3-5713	02/17/83	11/04/83	3
W3-4504/R3	07/08/83	12/03/83	No
W3-5124	11/06/83	09/13/83	4
W3-5063	10/22/82	10/19/83	4
W3-5071	10/22/82	10/19/83	4
W3-5070	10/22/82	02/09/84	4
W3-5074	11/04/82	10/19/83	4
W3-5232	11/08/82	10/13/83	4
W3-5231	11/08/82	03/19/84	4
W3-5398	12/13/82	02/01/84	4

Notes

1. Extension requested on October 6, 1983. Extension granted to October 20, 1983.
2. Extension requested on October 11, 1983, again on October 21, 1983. Extension granted to October 24, 1983.
3. Extension requested September 2, 1983, granted to September 30, 1983.
4. Extension requested on September 2, 1983, granted to September 30, 1983, but NCRs have no indication of this extension or any others.

This 20-day working requirement was removed from the ASP-III-7 procedure with the issuance of change issue "K." Issue "K," Section 6.3.1.a. now states "Monitor the status and required corrective action to assure timely completion." The definition of timely completion needs to be addressed.

The NRC staff also found that the 10 CFR 50.55(e) for evaluation for reportability did not include the proper engineering involvement. The evaluation was generally accomplished by a QA engineer only. ESSE apparently was not involved in the required engineering input.

W3-6530 - Identified a specific problem with EBASCO Letter No. W3-QAIRC-569 dated June 24, 1983, supplied by the allegor. This letter identified a T-B welding processing violation of EBASCO Specification 884-75, General Welding Requirements, Section II 6.04, which requires that the first weld pass in nuclear piping service shall be a gas tungsten arc weld (GTAW) process. Contrary to this requirement, T-B performed socket welds in carbon steel nuclear piping with a metal arch weld (SAW) process. NCR No. W3-6530 was issued on July 12, 1983, and was subsequently accepted by EBASCO engineering based upon the welds passing hydrostatic test and liquid penetrant or magnetic particle testing. Based upon this action and the fact that the ASME Code was not violated, the NRC staff concluded that the disposition was satisfactory.

W3-7241 and W3-7218 - The NRC staff reviewed these EBASCO NCRs and found them to be adequately dispositioned and properly closed.

The NRC staff believes NCRs were improperly dispositioned and closed out without corrective action being completed. This allegation has safety significance and generic implications and is indicative improper management controls.

[Potential Violations: The lack of proper disposition of NCRs and completion of the corrective action is a violation of 10 CFR 50, Appendix B, Criterion XVI.] 4

Action Required: See Item No. 6 in the enclosure to D. Eisenhut letter of June 13, 1984, to J. M. Cain (LP&L).

References:

1. EBASCO Procedure ASP-III-7, Processing of Nonconformances Procedures.
2. Interviews with Mr. L. Stinson.
3. Interview with Mr. Pertuit.
4. NCR Card Index.
5. NCR Master Tracking System.
6. EBASCO Interoffice Correspondence W3-CO-017.

7. EBASCO NCRs against N-5 data reports.
8. NCR W3-7170.

Statement Prepared By:

E. Fox

Date

T. Morgan

Date

J. Whittmore

Date

Reviewed By:

Team Leader

Date

Reviewed By:

Site Team Leader(s)

Date

Approved By:

Task Management

Date

SSER

Task: Allegation A-33; A-55; A-56; A-61b,⁶/_c,⁶/_d, & ⁶/_e; A-67; A-68; A-69; A-70; A-71; A-73; A-74; A-75; A-221; A-306 v&w; A-309; A-310; A-329

Reference No.: 4-83-A-81/B7; 4-83-A-88/7, 8, 13; 4-84-A-06/109, 185v, 185w; 4-84-A-12/1, 2, 19, 185v, 185w; 4-84-A-06

Characterization: The allegation is that EBASCO nonconformance reports (NCR) were not entered into the NCR system, were improperly dispositioned and closed without substantiating evidence, and that a questionable trending problem was being utilized.

Assessment of Allegation: The implied safety significance is that improperly dispositioned NCRs could place the quality of installation in question, and a questionable trending program could cause uncorrected problems in the QA program to continue undetected.

The NRC staff conducting a review of selected EBASCO quality assurance (QA) vault and the NCR tracking system. The selected NCRs were reviewed for content, compliance to procedures, accuracy, completeness of the disposition and final closure. The staff disclosed that 34 of 89 NCRs (38.2 percent) reviewed were improperly dispositioned.

The NRC staff evaluated EBASCO's NCR trending program. It was found to be adequate and was performing its intended functions.

The issue of NCRs not being properly entered into the EBASCO NCR system was addressed in detail in Allegations A-18, A-53, and A-283.

The following is a summary of the NRC staff review of EBASCO NCRs that contained questionable dispositions:

EBASCO W3 NCRs

NCR 7139 - This NCR involved field inspection for the horizontal seismic supports for Radiation Monitors RE-HV 5028S, RE-HV 5028S, RE-HV 5031S, and RE-HV 0200.65. Only the data for the RE-HV 5031S support was the correct attachment (see Attachment No. 2 of NCR). LP&L reopened NCR and corrected seismic support identification problem (see Attachment No. 4 of NCR). The NRC staff identified this problem and LP&L took action which was acceptable to the staff.

NCR-3912 - Involved no 23J-2 type supports discovered during walkdown for which the fit-up inspection was by-passed. The original NCR disposition failed to address the actions required to prevent the reuse of the items. Attachment

FINAL SSER ROUTING

Revision :	0	1	2	3
Denny Crutchfield				
✓ Jim Gagliardo	<i>YK 6/24</i>			

*all comments incorporated
JJA
6/25*

FINAL SSER ROUTING

Revision :	0	1	2	3
✓ Denny Crutchfield	<i>DMC 6/1</i>			
Jim Gagliardo			<i>YK 7/18</i>	

A-33

No. 14 of this NCR identified this issue which was resolved by stating "it was not required for the disposition of this NCR" No other NCR was reopened or referenced to resolve the issue.

NCR-5565 - Identified that a QA inspector trainee signed off on the fuel handling building (FHB) crane quality verification (QV) inspections. the NCR called for a complete reinspection. There are no documents attached to this NCR showing a reinspection was performed. The NCR states " . . . corrective action per Attachment #4 . . . ," but there was no Attachment No. 4 to the NCR package.

NCR-5563 - Identified that a QA inspector trainee dispositioned NCR No. W3-1728 for J. A. Jones QV Department. This in violation of the requirements of ANSI N45.2.6. The inspections in question were signed off on August 27, August 28, and November 6, 1979, and then by a co-signature on February 4, 1982, by a QA inspector who claimed to be present at the first inspection. This co-signature of the inspections in question eliminated the requirement for a reinspection called for in the recommended disposition. The co-signature was applied 3 years and 5 months later. The NRC staff found this to be a questionable disposition of the NCR.

NCR-6159 - A sample inspection of Tubetrack welding identified that prior to July 1982 an unknown quantity of welding was performed using WPS-"B" procedure without backing plates. This NCR raises the question of traceability problems that were not identified and addressed by the NCR. The NRC staff also found that the sample used when tensile testing the welds was questionable. The sample should have been representative of the weakest weld joint in lieu of the strongest (i.e., worst case example should have been used to conduct tests).

NCR-3919 - Was initiated due to a tubing crack discovered during a system hydrostatic test of instrument line PT-RC-0173, system 52A2, Reactor Coolant. This NCR also resulted in Significant Construction Deficiency (SCD) No. 61 being issued. It was determined that the tubing failure was a result of a manufacturing defect (process not metallurgical), and an attempt was made to ascertain that all tubing of this specific heat number was reinspected. Due to the problem associated with traceability (being lost), the corrective action was to reinspect all tubing installations to locate this heat of defective tubing. The reinspection reportedly located all installation locations. The NRC staff review of this NCR revealed that operational control record (OCR) installation packages indicated that approximately 530 ft. more tubing was installed than was received on site. This was also verified by a review of warehouse issuance records. The "Requisition on Warehouse" form had been changed using liquid paper and a subsequent entry had been crossed out with ink.

SCD 61 states that the tubing in question, Heat No. 466023, $\frac{1}{2}$ tubing, was installed in 89 instrument locations. A sample of nine OCR packages for fuel handling building (FHB), reactor containment building (RCB) and reactor auxiliary building (RAB) systems were reviewed to verify where the tubing was in fact installed. The nine packages (10 percent) were randomly selected from the list used to disposition the NCR. Only one OCR package actually reflected that the

tubing in question was installed. This was also verified by an NRC staff walkdown. The walkdown on the eight remaining OCRs revealed different heat numbers installed; however, the OCRs were in agreement with these heat numbers.

Therefore, the list used for dispositioning this NCR was invalid; this NCR and SCD 61 were also invalid, as was the testing and disposition.

NCR-6514 * - The problem of traceability for the weld being performed was still in question; not addressed. The NCR also questioned use of some Bergen-Patterson designed supports installed by Mercury without traceability. This problem was also not addressed by referenced attachment.

NCR-3941-RI * - Identified that support number one that fit-up inspection was by-passed and the support had been completely welded out with only the welder's ID.

NCR-5819 * - Identified the problem of instrumentation supports being painted prior to final welded visual inspection. Disposition had been to inspect the welds through paint which was unacceptable.

NCR-6221 - Identified that Weld Control records were signed off by an individual who was not a certified Level II inspector. Sign-off was based on Letter of Designation. The NCR disposition referred to the Tompkins-Beckwith (T-B) (April 1, 1980) Quality Manual that was not in effect at the time the Letter of Designation was written (January 8, 1979). Also, a reference given in the Letter of Designation did not allow designee sign-offs and was in effect as of March 15, 1983; the Letter of Designation also failed to meet the requirements of ANSI N45.2.6.

NCR-6511 (Mercury-3336) - Stated that "during final inspection of installed T-Beam for support 1117-114, weld to existing beam 1A was rejected." The NCR only addressed the fact that the maximum gap was violated, but the weld was rejected for: (1) undersize, (2) lack of Fusion, (3) arc strikes, and (4) undercut. Mercury NCR 3336 recommended weld removal and rework. This recommendation was crossed out and only the nonconforming fit-up gap was addressed. There were not records of rework or reinspection, and only copies of Mercury's NCR were attached to EBASCO's NCR.

NCR-4219 (Mercury-614) - Identified a violation of QCP3110.4 paragraph 6. The nonconformance was that the sample system piping had been bent downward causing a low point in the piping. The piping was being forced down by support SLRR-188. QCP-3110.4 stated that "tubing must be properly routed." This disposition stated that "... tubing was re-evaluated after support SLRR-188 and sample line were installed, after completion of Penetration 29 work." There were no records for rework or reinspection to indicate satisfactory reinstallation of supports and sample lines.

* These NCRs were closed out by referring to EBASCO letter F-61147E. The problem is that this letter did not close out these or other NCRs.

NCR-7432 - Identified a problem with preplacement and postplacement documentation. The documentation could not be matched because the identification of the various placements were on different quality control (QC) forms. Also, this NCR was dispositioned by stating "... this problem was addressed on other NCRs and therefore voided ..." No specific references were used; therefore, this disposition is unacceptable. Also, a QA engineer approved the recommended disposition and then voided the NCR.

NCR-4137 - Identified material and weld problems on support SLRR-238. This NCR has been closed out but failed to have 3 of 4 required welds on "M" gusset plates completed. This problem was identified during a QA review and a discrepancy notice (DN) was issued for the missing welds. This is an example of improper NCR closure and reopening, and of the use of an incorrect reporting system (DN in lieu of NCR).

NCR-4088 (Mercury-491) - This NCR identified numerous discrepancies found during a walkdown performed against drawing 160-T-035-A. There is no documentation that work was accomplished or completed. The only document attached to this NCR was a Quality Control (QC) Report which listed numerous references but none were attached. EBASCO could not locate the referenced documents.

NCR-5974 - Identified a problem work loss of heat number traceability for safety and non-safety grade related materials. This NCR was used to disposition approximately 150 to 200 DNs with "Q" prefix. NRC staff review indicated that in almost all cases loss of heat traceability was deemed acceptable. This NCR's disposition is questionable to the NRC staff. The problem still existed in that safety and non-safety grade material could have been mixed; i.e., there was questionable use of material with no pedigree or the material could have been the incorrect type and grade.

NCR-5564 - Identified the problem of performing the final weld inspection after the weld has been painted. This NCR was closed out referencing an EBASCO letter which stated "the inspection criteria will be without removing paint to inspect for undersize weld and lack of weld material where installation drawing calls for weld material to be deposited by the installer. This disposition is unacceptable because visual inspections also include an examination for welding defects, not just dimensions.

NCR-6786 - Identified that many Mercury NCRs were issued concerning the lack of heat numbers. These NCRs were closed by referencing a generic series of EBASCO NCRs. The EBASCO disposition stated that the possible heat numbers will be documented on the Mercury as-built drawings. This data is not recorded on the as-built drawings, however, the Mercury Company NCRs have been closed. The disposition of this NCR does not address where the required heat numbers were recorded or how traceability was maintained.

NCR-7177 - It was noted that Fischbach and Moore (F&M) violated Procedure QCP-309, 6.3.2.4, that is, they failed to test three additional expansion anchors for every anchor that failed. It was also identified that an uncalibrated pressure gauge was used on the tension tester and tension testers serial numbers were not recorded. The NCR disposition stated that "QCP-309 did

not require recording serial numbers;" this violates ANSI N45.2, Section 13, that requires the traceability of measuring and test equipment to point of usage. F&M should have written an NCR. Inspection Report (IR) 311-06-70 and IR 310-36-43 identified bolt failure due to excessive slippage. Dispositions prescribed by these IRs were in violation of QCP 309, Section 6.3.2.2(d) and 6.4.3.

NCR-7182, NCR-7180, NCR-7181, NCR-7184, NCR-6723 - These NCRs also involve a violation of ANSI N45.2, Section 13 requirements in that QCP 309 did not require the tension testing equipment's serial number, calibration date, and pressure gauge number to be recorded.

NCR-7547 - Noted discrepancies against OCR-1830 and Mercury NCR-0806. The disposition of this NCR is unsatisfactory do to the system passing a hydrostatic test is used as the basis for acceptability of fit-up discrepancy between the union and tubing. This does not take into account the effects of service conditions such as vibration and cyclic loads, and an engineering evaluation was not performed.

NCR-1650 - Ungraded DN No. MC 2128, which identified that the pressure gauge on the anchor bolt tension tester, was found to be out of tolerance reading (+450 psi higher than actual). The NCR disposition was to retest all anchor bolts installed subsequent to the date the tension test was determined to be out of calibration. The question is how was it determined which bolt(s) to retest when QCP 309 did not require the recording of tester serial number, on the previous tests? NCR 1803 also referred to gauges being out of calibration. Also see NCRs 7177, 7182, 7180, 7181, 7184, and 6723.

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disposition by EBASCO states, "Evaluation indicates that the stresses are low." There is no documentation indicating what stresses were being referred to. In addition, the recommended disposition "that ESSE (EBASCO Site Support Engineering) evaluate the cabinet base metal cracks" was not addressed. Improper weld length could not be achieved because the incorrect sized embed plates were installed and there were bolt holes that had been filled with grout in the areas required to be welded. Weld size and length were not adequately addressed.

NCR-4593 - Disposition inadequate. See A-232 for details.

The NRC staff also discovered that the EBASCO requirement for having the NCR closed within a 20-day period or having an extension granted was consistently violated. The following table is an example of NCRs found to exceed the closure time requirements of ASP-III-7, Section 6.1.3.a:

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1. Extension requested on October 6, 1983. Extension granted to October 20, 1983.
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The NRC staff also found that the 10 CFR 50.55(e) for evaluation for reportability did not include the proper engineering involvement. The evaluation was generally accomplished by a QA engineer only. ESSE apparently was not involved in the required engineering input.

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W3-7241 and W3-7218 - The NRC staff reviewed these EBASCO NCRs and found them to be adequately dispositioned and properly closed.

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Potential Violations: The lack of proper disposition of NCRs and completion of the corrective action is a violation of 10 CFR 50, Appendix B, Criterion XVI.] 4

Action Required: See Item No. 6 in the enclosure to D. Eisenhower letter of June 13, 1984, to J. M. Cain (LP&L).

References:

1. EBASCO Procedure ASP-III-7, Processing of Nonconformances Procedures.
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Statement Prepared By:

E. Fox

Date

T. Morgan

Date

J. Whittmore _____ Date _____

Reviewed By:

Team Leader _____ Date _____

Reviewed By:

Site Team Leader(s) _____ Date _____

Approved By:

Task Management _____ Date _____

Document Name:
SSER A-33

Requestor's ID:
JOYCE

Author's Name:

Document Comments:

Call Harrison

→ see references,

AG/b-e Did you review All NCR's against N-5
W3 7170 → ~~STILL Looking~~ SEE reference.
W3 4593 → ~~SEE SSER's *160 pg 2, *232 pg 7~~
SEE page 10.
W3 5819 → SEE SSER *33 pg 3

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Did you review L P & L's Response to SRI Yes

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7/3 acknowledges
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Does Denny C.
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Jim

Revision 1

6/27/84

SSER

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Task: Allegation A-33; A-55, A-56; A-61; A-67; A-68; A-69; A-70; A-71; A-73;
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Characterization: The allegation is that EBASCO nonconformance reports (NCR) were not entered into the NCR system, were improperly dispositioned and closed without substantiating evidence, and that a questionable trending problem was being utilized.

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Ebasco W3 NCRs

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NCR-3912 - Involved none 23J-2 type supports discovered during walkdown for which the fit-up inspection was by-passed. The original NCR disposition failed to address the actions required to prevent the reuse of the items. Attachment #14 of this NCR identified this issue which was resolved by stating "it was not required for the disposition of this NCR" No other NCR was reopened or referenced to resolve the issue.

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NCR-6159 - A sample inspection of Tubetrack welding identified that prior to July 1982 an unknown quantity of welding was performed using WPS-"B" procedure without backing plates. This NCR raises the question of traceability problems that were not identified and addressed by the NCR. The NRC staff also found that the sample used when tensile testing the welds was questionable. The sample should have been representative of the weakest weld joint in lieu of the strongest (i.e., worst case example should have been used to conduct tests).

NCR-3919 - Was initiated due to a tubing crack discovered during a system hydrostatic test of instrument line PT-RC-0173, system 52A2, Reactor Coolant.

This NCR also resulted in Significant Construction Deficiency (SCD) No. 61 being issued. It was determined that the tubing failure was a result of a manufacturing defect (process not metallurgical), and an attempt was made to ascertain that all tubing of this specific heat number was reinspected. Due to the problem associated with traceability (being lost), the corrective action was to reinspected² all tubing installations to locate this heat of defective tubing. The reinspection reportedly located all installation locations. The NRC staff review of this NCR revealed that operational control record (OCR) installation packages indicated that approximately 530 ft. more tubing was installed than was received on site. This was also verified by a review of warehouse issuance records. The "Requisition on Warehouse" form had been changed using liquid paper and a subsequent entry had been crossed out with ink.

SCD 61 states that the tubing in question, heat # 466023, $\frac{1}{2}$ tubing, was installed in 89 instrument locations. A sample of nine OCR packages for fuel handling building (FHB), reactor containment building (RCB) and reactor auxiliary building (RAB) systems were reviewed to verify where the tubing was in fact installed. The nine packages (10%) were randomly selected from the list used to disposition the NCR. Only one OCR package actually reflected that the tubing in question was installed. This was also verified by an NRC staff walkdown. The walkdown on the eight remaining OCRs revealed different heat numbers installed; however, the OCRs were in agreement with these heat numbers.

Therefore, the list used for dispositioning this NCR was invalid; this NCR and SCD 61 were also invalid, as was the testing and disposition.

NCR-6514 *- The problem of traceability for the weld being performed was still in question; not addressed. The NCR also questioned use of some Bergen-Patterson designed supports installed by Mercury without traceability. This problem was also not addressed by referenced attachment.

NCR-3941-RI *- Identified that support number one that fit-up inspection was by-passed and the support had been completely welded out with only the welder's ID.

NCR-5819 *-Identified the problem of instrumentation supports being painted prior to final welded visual inspection. Disposition had been to inspect the welds through paint which was unacceptable.

NCR-6221 - Identified that Weld Control records were signed off by an individual who was not a certified Level II inspector. Sign-off was based on Letter of Designation. The NCR disposition referred to the Tompkins-Beckwith (T-B) (April 1, 1980) Quality Manual that was not in effect at the time the Letter of Designation was written (January 8, 1979). Also, a reference given in the Letter of Designation did not allow designee sign-offs and was in effect as of March 15, 1983; the Letter of Designation also failed to meet the requirements of ANSI N45.2.6.

*These NCRs were closed out by referring to EBASCO letter F-61147E. The problem is that this letter did not close out these or other NCRs.

NRC-6511 (Mercury-3336) - Stated that "during final inspection of installed I-Beam for support 1117-114, weld to existing beam 1A was rejected." The NCR only addressed the fact that the maximum gap was violated, but the weld was rejected for: (1) undersize, (2) lack of Fusion, (3) arc strikes, and (4) undercut. Mercury NCR 3336 recommended weld removal and rework. This recommendation was crossed out and only the nonconforming fit-up gap was addressed. There were not records of rework or reinspection, and only copies of Mercury's NCR were attached to EBASCO's NCR.

NCR-4219 (Mercury-614) - Identified a violation of QCP3110.4 paragraph 6. The nonconformance was that the sample system piping had been bent downward causing a low point in the piping. The piping was being forced down by support SLRR-188. QCP-3110.4 stated that "tubing must be properly routed." This disposition stated that "... tubing was re-evaluated after support SLRR-188 and sample line were installed, after completion of Penetration 29 work." There were no records for rework or reinspection to indicate satisfactory reinstallation of supports and sample lines.

NCR-7432 - Identified a problem with preplacement and postplacement documentation. The documentation could not be matched because the identification of the various placements were on different quality control (QC) forms. Also, this NCR was dispositioned by stating "... this problem was addressed on other NCRs and therefore voided" No specific references were used; therefore, this disposition is unacceptable. Also, a QA engineer approved the recommended disposition and then voided the NCR.

NCR-4137 - Identified material and weld problems on support SLRR-238. This NCR has been closed out but failed to have 3 of 4 required welds on "M" gusset

plates completed. This problem was identified during a QA review and a discrepancy notice (DN) was issued for the missing welds. This is an example of improper NCR closure and reopening, and of the use of an incorrect reporting system (DN in lieu of NCR).

NCR-4088 (Mercury-491) - This NCR identified numerous discrepancies found during a walkdown performed against drawing 160-T-035-A. There is no documentation that work was accomplished or completed. The only document attached to this NCR was a Quality Control (QC) Report which listed numerous references but none were attached. EBASCO could not locate the referenced documents.

NCR-5974 - Identified a problem with loss of heat number traceability for safety and non-safety grade related materials. This NCR was used to disposition approximately 150 to 200 DNs with "Q" prefix. NRC staff review indicated that in almost all cases loss of heat traceability was deemed acceptable. This NCR's disposition is questionable to the NRC staff. The problem still existed in that safety and non-safety grade material could have been mixed, i.e., there was questionable use of material with no pedigree or the material could have been the incorrect type and grade.

NCR-5564 - Identified the problem of performing the final weld inspection after the weld has been painted. This NCR was closed out referencing an EBASCO letter which stated "the inspection criteria will be without removing paint to inspect for undersize weld and lack of weld material where installation drawing calls for weld material to be deposited by the installer. This disposition is unacceptable because visual inspections also include an examination for welding defects, not just dimensions.

NCR-6786 - Identified that many Mercury NCRs were issued concerning the lack of heat numbers. These NCRs were closed by referencing a generic series of EBASCO NCRs. The EBASCO disposition stated that the possible heat numbers will be documented on the Mercury as-built drawings. This data is not recorded on the as-built drawings, however, the Mercury Company NCRs have been closed. The disposition of this NCR does not address where the required heat numbers were recorded or how traceability was maintained.

NCR-7177 - It was noted that Fischbach and Moore (F&M) violated Procedure QCP-309, 6.3.2.4, that is, they failed to test three additional expansion anchors for every anchor that failed. It was also identified that an uncalibrated pressure gauge was used on the tension tester and tension testers serial numbers were not recorded. The NCR disposition stated that "QCP-309 did not require recording serial numbers;" this violates ANSI N45.2 Section 13, that requires the traceability of measuring and test equipment to point of usage. F&M should have written an NCR. Inspection Report (IR) 311-06-70 and IR 310-36-43 identified bolt failure due to excessive slippage. Dispositions prescribed by these IRs were in violation of QCP 309, Section 6.3.2.2(d) and 6.4.3.

NCR-7182, NCR-7180, NCR7181, NCR-7184, NCR-6723 - These NCRs also involve a violation of ANSI-N45.2, Section 13 requirements in that QCP-309 did not require the tension testing equipment's serial number, calibration date, and pressure gauge number to be recorded.

NCR-7547 - Noted discrepancies against OCR-1830 and Mercury NCR-0806. The disposition of this NCR is unsatisfactory do to the system passing a

hydrostatic test is used as the basis for acceptability of fit-up discrepancy between the union and tubing. This does not take into account the effects of service conditions such as vibration and cyclic loads, and an engineering evaluation was not performed.

NCR-1650 - Ungraded DN # MC 2128, which identified that the pressure gauge on the anchor bolt tension tester, was found to be out of tolerance reading +450 psi higher than actual). The NCR disposition was to retest all anchor bolts installed subsequent to the date the tension test was determined to be out of calibration. The question is how was it determined which bolt(s) to retest when QCP-309 did not require the recording of tester serial number, on the previous tests? NCR 1803 also referred to gauges being out of calibration. Also see NCRs 7177, 7182, 7180, 7181, 7184, and 6723.

NCR-6623 - Identified a heat number and signature being falsified. The tubing in question was removed and replaced in accordance with Mercury NCR 3696. The question was what was done to assure that no other heat numbers were falsified by Mercury, and who forged the signature and entered the heat number on QC Material Verification Mechanical Inspection Report? The NCR's disposition did not address the falsification question and the reference to SCD-57 deals only with traceability.

NCR-5586 - Weld Testing Laboratory was not surveyed (audited) and placed on the Approved Vendors List by Mercury prior to welder performance qualification taking place. This item not addressed in disposition. Also, the statement provided by the test lab that "a Mercury inspector reviewed all tests," is not

adequate. Mercury should have had the person(s) who performed this surveillance document the activity.

NCR-6165 - States "... welder R-1 is not qualified to this procedure. . . ." The disposition states, "... Measures taken to preclude recurrence is required. . . ." No objective evidence of this action could be located.

NCR-7099 - Identified improper weld on cabinets 48A and 48B. Numerous problems was noted with this NCR disposition. FCR-IC-P-416, Revision 1, Sk-1, called for a fillet weld where a flare bevel weld was required. There is no documentation to adequately support the NCR disposition. Also, the evaluation of disposition by EBASCO states, "Evaluation indicates that the stresses are low." There is no documentation indicating what stresses were being referred to. In addition, the recommended disposition "that ESSE (EBASCO Site Support Engineering) evaluate the cabinet base metal cracks" was not addressed. Improper weld length could not be achieved because the incorrect sized embed plates were installed and there were bolt holes that had been filled with grout in the areas required to be welded. Weld size and length were not adequately addressed.

NCR-4593 - Disposition inadequate. See A-232 for details.

The NRC staff also discovered that the EBASCO requirement for having the NCR closed within a 20-day period or having an extension granted was consistently violated. The following table is an example of NCRs found to exceed the closure time requirements of ASP-III-7, Section 6.1.3.a:

TABLE OF NCRs NOT MEETING THE 20 DAY ACTION LIMIT

<u>NCR #</u>	<u>Issue Date</u>	<u>Verification of Disposition Date</u>	<u>Extension letter attached (See notes for explanation)</u>
W3-6597	7/6/83	11/28/83	no
W3-6950	7/3/83	10/18/83	no
W3-6615	07/27/83	10/25/83	1
W3-6032	04/06/83	10/21/83	2
W3-5713	02/17/83	11/04/83	3
W3-4504/R3	07/08/83	12/03/83	no
W3-5124	11/06/83	09/13/83	4
W3-5063	10/22/82	10/19/83	4
W3-5071	10/22/82	10/19/83	4
W3-5070	10/22/82	02/09/84	4
W3-5074	11/04/82	10/19/83	4
W3-5232	11/08/82	10/13/83	4
W3-5231	11/08/82	03/19/84	4
W3-5398	12/13/82	02/01/84	4

Notes

1. Extension requested on October 6, 1983. Extension granted to October 20, 1983.

2. Extension requested on October 11, 1983, again on October 21, 1983.
Extension granted to October 24, 1983.
3. Extension requested September 2, 1983, granted to September 30, 1983.
4. Extension requested on September 2, 1983, granted to September 30, 1983,
but NCRs have no indication of this extension or any others.

This 20 day working requirement was removed from the ASP-III-7 procedure with the issuance of change issue "K". Issue "K", Section 6.3.1.a. now states "Monitor the status and required corrective action to assure timely completion." The definition of timely completion needs to be addressed.

The NRC staff also found that the 10 CFR 50.55(e) for evaluation for reportability did not include the proper engineering involvement. The evaluation was generally accomplished by a QA engineer only. ESSE apparently was not involved in the required engineering input.

W3-6530 - Identified a specific problem with EBASCO Letter No. W3-QAIRG-569 dated June 24, 1983, supplied by the allegor. This letter identified a T-B welding processing violation of EBASCO Specification 884-75, General Welding Requirements, Section II 6.04, which requires that the first weld pass in nuclear piping service shall be a gas tungsten arc weld (GTAW) process. Contrary to this requirement, T-B performed socket welds in carbon steel nuclear piping with a metal arch weld (SMAW) process. NCR No. W3-6530 was issued on July 12, 1983, and was subsequently accepted by EBASCO engineering based upon the welds passing hydrostatic test and liquid penetrant or magnetic

particle testing. Based upon this action and the fact that the ASME Code was not violated, the NRC staff concluded that the disposition was satisfactory.

W3-7241 and W3-7218 - The NRC staff reviewed these EBASCO NCRs and found them to be adequately dispositioned and properly closed.

The NRC staff believes NCRs were improperly dispositioned and closed out without corrective action being completed. This allegation has safety significance and generic implications and is indicative improper management controls.

Potential Violations: The lack of proper disposition of NCRs and completion of the corrective action is a violation of 10 CFR 50, Appendix B, Criterion XVI.] 4

Action Required: See Item No. 6 in the Enclosure to D. Eisenhower letter of 6/13/84 to J. M. Cain (LP&L).

References

1. Ebasco Procedure ASP-III-7, Processing of Nonconformances Procedures.
2. Interviews with Mr. L. Stinson.
3. Interview with Mr. Pertuit.
4. NCR Card Index.

5. NCR Master Tracking System.

6. EBASCO Interoffice Correspondence W3-CO-017.

7. EBASCO NCR's against N-5 data reports.

8. NCR W3-7170

Statement prepared by

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Date

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Date

J. Whittmore

Date

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Team Leader

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Site Team Leader(s)

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Task Management

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Document Name:
A-33

Requestor's ID:
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Waterford Open Issue - *A-33

WATERFORD OPEN ISSUE

Task: A-33; A-55; A-56; A-61b; A-61c, A-61d, A-61e; A-67 thru 71; A-73 thru A-75; A-329; A-309; A-310; A-221

Reference No.: 4-83-A-81/7; 4-83-A-88/7; 4-83-A-88/8 & 13; 4-84-06-A-12/19; 4-84-A-12/1; 4-84-A-12/2; 4-84-A-06/184t,v,&w; 4-84-A-06/109

Characterization: NCRs improperly dispositioned and closed without substantiating evidence - EBASCO/contractors. Also questionable trending program.

Initial Assessment of Significance: Nonconforming conditions may still exist.

Source: Allegor ["A."] 1

Approach to Resolution:

1. Review nonconformance program and procedures.
2. Using NCR Log, select a sample to be verified.
3. Look for missing NCRs and voided NCRs.
4. Assess each NCR disposition for adequacy.
5. Use as is dispositions should have engineering/committee type approval.
6. Repair type dispositions should have reinspection to original attributes.
7. Determine if NCRs are assessed for 50.55(e) potential.
8. Review trending program. Make sure closed NCRs are trended.
9. See LP&L response to Items 8 and 13 dated March 1, 1984, and March 9, 1984, and evaluate (in RI's file/safe).
10. RI's file/safe contains information and copies of some of the NCRs referenced above. (4-83-A-88)
11. Evaluate for generic/safety implications.
12. Report results of review/evaluation of allegation.

Status: In Progress - Team 2 (Fox, Whittemore, Morgan, Freed)

Review Lead: J. Harrison

Support:

Estimated Resources: 10 man-days (total)

Estimated Completion: May 3, 1984

CLOSURE:

Document Name:
A-33

Requestor's ID:
JOHNNIE

Author's Name:
JHarrison/jkh

Document Comments:
Waterford Open Issue - *A-33

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Retype draft 8

OK mw

DRAFT 7
07/17/84

WATERFORD OPEN ISSUE

A-61b, A-61c, A-61d A-61e

Task: *2* A-33; A-55; A-56; *A-61*; A-67 thru 71; A-73 thru A-75; A-329; A-309; A-310; A-221

Reference No.: 4-83-A-81/7; 4-83-A-88/7; 4-83-A-88/8 & 13; 4-84-06-A-12/19; 4-84-A-12/1; 4-84-A-12/2; 4-84-A-06/184t,v,&w; 4-84-A-06/109

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Allegation *A-33

- 2 -

Review Lead: J. Harrison

Support:

Estimated Resources: 10 man-days (total)

Estimated Completion: May 3, 1984

CLOSURE: