

SSER

Task: Allegation A-227

Reference No.: 4-48-A-06/115

Characterization: It is alleged that a recommended system for identifying and dispositioning nonconformances was written by an EBASCO employee for seismic Category I supports but was rejected by EBASCO management.

Assessment of Allegation: The implied significance of this allegation is that EBASCO's nonconformance system for seismic supports may have been inadequate and that nonconformances may not have been properly identified and dispositioned which render the quality of the supports as indeterminant.

The NRC staff evaluated Mercury Construction Company procedures for controlling nonconformances to determine the adequacy of the system, and to determine if there was a compatible system in place such as that recommended by the EBASCO employee. The staff also interviewed EBASCO personnel who were involved in the review, audit, inspection, and disposition and closure of Mercury nonconformance reports (NCRs).

In its review of Mercury procedures, the NRC staff found that the EBASCO employee's recommended procedure had not been specifically incorporated, and that no subsequent changes were made to the nonconformance system. Mercury Procedure SP664 required the writing of NCRs when necessary.

The NRC staff also interviewed personnel who were involved in Mercury nonconformance activities. The staff found that Mercury's system did not include any type of nonconformance document other than an NCR, (such as a discrepancy notice (DN)) for a suspected nonconformance. Only NCRs were entered into the system; this caused many more NCRs to be issued than were actually necessary. This use of NCRs, rather than DNs or other types of reports, was supported by the statements in procedure SP664 which stated, "The reporting of nonconformances shall not be limited to QA/QC department. Whenever a suspected nonconformance is discovered, it shall be the responsibility of the individual or department to initiate a nonconformance report." [Emphasis added.] ✓

In the interviews, the NRC staff also found that, to assure proper disposition, a 100% review based on EBASCO NCR W3-7317 was performed on Mercury NCRs that had been dispositioned "use-as-is." During system turnover, NCRs were also reviewed as part of the turnover packages.

The NRC staff believes the responsibility and decision to accept or reject an employee suggestion on a procedure was the option of management. EBASCO and Mercury management made the decision not to accept the EBASCO employee's suggestion for a new procedure. The NRC staff found the nonconformance system used by EBASCO and Mercury acceptable.

This allegation has neither safety significance nor generic implications.

FINAL SSER ROUTING

A-227

Revision :	0	1	2	3
Denny Crutchfield	WALT			
Jim Gagliardo				

ECW
6/19

INCLUDED WITH JG/DC's comments

FINAL SSER ROUTING

A-227

Revision :	0	1	2	3
✓ Denny Crutchfield	DMK 6/16			
Jim Gagliardo	1/1/21			

Need
JG
6/19

REV. 0, 6/15/21 INCLUDES OLIN's comments

Final
6/25

The NRC staff also reviewed other allegations related to Mercury NCRs. See the staff assessment of Allegation A-232.

Potential Violations: None.

Actions Required: None.

References

1. Mercury Procedures N49720-SP664, Procedure for Handling of Nonconformances and Corrective Action, September 27, 1982, and March 8 and May 10, 1983.
2. NCR W3-7317, October 26, 1983.
3. Interoffice Correspondence W30AIRG-0128, October 27, 1982.
4. Mercury Program Milestone Completion, April 24, 1984.
5. Allegation B Exhibit 12.

Statement Prepared By:

B. Freed

9/12/84
Date

Reviewed By:

Team Leader

Date

Reviewed By:

Site Team Leader(s)

Date

Approved By:

Task Management

Date

SSER

Task: Allegation A-227

Reference No.: 4-48-A-06/115

Characterization: It is alleged that a recommended system for identifying and dispositioning nonconformances was written by an EBASCO employee for seismic Category I supports but was rejected by EBASCO management.

Assessment of Allegation: The implied significance of this allegation is that EBASCO's nonconformance system for seismic supports may have been inadequate and that nonconformances may not have been properly identified and dispositioned which render the quality of the supports as indeterminant.

The NRC staff evaluated Mercury Construction Company procedures for controlling nonconformances to determine the adequacy of the system, and to determine if there was a compatible system in place such as that recommended by the EBASCO employee. The staff also interviewed EBASCO personnel who were involved in the review, audit, inspection, and disposition and closure of Mercury nonconformance reports (NCRs).

In its review of Mercury procedures, the NRC staff found that the EBASCO employee's recommended procedure had not been specifically incorporated, and that no subsequent changes were made to the nonconformance system. Mercury Procedure SP664 required the writing of NCRs when necessary.

The NRC staff also interviewed personnel who were involved in Mercury nonconformance activities. The staff found that Mercury's system did not include any type of nonconformance document other than an NCR, such as a discrepancy notice (DN), for a suspected nonconformance. Only NCRs were entered into the system; this caused many more NCRs to be issued than were actually necessary. This use of NCRs, rather than DNs or other types of reports, was supported by the statements in procedure SP664 which stated, "The reporting of nonconformances shall not be limited to QA/QC department. Whenever a suspected nonconformance is discovered, it shall be the responsibility of the individual or department to initiate a nonconformance report." [Emphasis added.]

In the interviews, the NRC staff also found that, to assure proper disposition, a 100% review based on EBASCO NCR W3-7317 was performed on Mercury NCRs that had been dispositioned "use-as-is." During system turnover, NCRs were also reviewed as part of the turnover packages.

The NRC staff believes the responsibility and decision to accept or reject an employee suggestion on a procedure was the option of management. EBASCO and Mercury management made the decision not to accept the EBASCO employee's suggestion for a new procedure. The NRC staff found the nonconformance system used by EBASCO and Mercury acceptable.

This allegation has neither safety significance nor generic implications.

The NRC staff also reviewed other allegations related to Mercury NCRs. See the staff assessment of Allegation A-232.

Potential Violations: None.

Actions Required: None.

References

1. Mercury Procedures N49720-SP664, Procedure for Handling of Nonconformances and Corrective Action, September 27, 1982, and March 8 and May 10, 1983.
2. NCR W3-7317, October 26, 1983.
3. Interoffice Correspondence W3QAIRG-0128, October 27, 1982.
4. Mercury Program Milestone Completion, April 24, 1984.
5. Allegor B, Exhibit 12.

Statement Prepared By:

B. Freed

Date

Reviewed By:

Team Leader

Date

Reviewed By:

Site Team Leader(s)

Date

Approved By:

Task Management

Date

SSER

Task: Allegation A-227

Reference No.: 4-48-A-06/115

Characterization: It is alleged that a recommended system for identifying and dispositioning nonconformances was written by an Ebasco employee for seismic Category I supports but was rejected by Ebasco management.

Assessment of Allegation: The implied significance of this allegation is that Ebasco's nonconformance system may have been inadequate and that nonconformances may not have been properly identified and dispositioned, which render the quality of the supports as indeterminate.

The NRC staff evaluated Mercury Construction Company procedures for controlling nonconformances to determine the adequacy of the system, and to determine if there was a compatible system in place such as that recommended by the Ebasco employee. The staff also interviewed Ebasco personnel who were involved in the review, audit, inspection, and disposition and closure of Mercury nonconformance reports (NCRs).

In its review of Mercury procedures, the NRC staff found that the Ebasco employee's recommended procedure had not been specifically incorporated, and that no subsequent changes were made to the nonconformance system. Mercury Procedure SP664 required the writing of NCRs when necessary.

The NRC staff also interviewed personnel who were involved in Mercury nonconformance activities. The staff found that Mercury's system did not include any type of nonconformance document other than an NCR, such as a discrepancy notice (DN), for a suspected nonconformance. Only NCRs were entered into the system; this caused many more NCRs to be issued than were actually necessary. This use of NCRs, rather than DNs or other types of reports, was supported by the statements in procedure SP664 which stated, "The reporting of nonconformances shall not be limited to QA/QC department. Whenever a suspected nonconformance is discovered, it shall be the responsibility of the individual or department to initiate a nonconformance report." [Emphasis added.]

In the interviews, the NRC staff also found that, to assure proper disposition, a 100% review based on Ebasco NCR W3-7317 was performed on Mercury NCRs that had been dispositioned "use-as-is." During system turnover, NCRs were also reviewed as part of the turnover packages.

The NRC staff believes the responsibility and decision to accept or reject an employee suggestion is the option of management. Ebasco and Mercury management made the decision not to accept the Ebasco employee's suggestion. The NRC staff found the nonconformance system used by Ebasco and Mercury acceptable.

This allegation has neither safety significance nor generic implications.

on a procedure

for a new procedure.

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SSER A-227

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