

SSER

Task: Allegation A-286; A-289a

Reference No.: 4-84-A-06-168; 4-84-A-06-170a

Characterization: The allegation is that Tompkins-Beckwith (T-B) Records Reviewers falsified heat numbers to demonstrate adequate traceability. Examples of affected startup systems (SUS) included SUS-36, Component Cooling Water and SUS-60, Safety Injection.

Assessment of Allegation: The implied significance of this allegation is that heat numbers may have been falsified and that the quality assurance (QA) documentation may not reflect the actual hardware in the plant, placing the quality of installation in question.

The NRC staff reviewed this allegation by evaluating T-B document system procedures and comparing them to the ASME Code and applicable ANSI N45.2 requirements. The NRC staff found T-B's procedures to be adequate (also see Allegations A-35, A-172, and A-308).

The NRC staff reviewed a sample of T-B turnover packages and found them to be adequate. This review is discussed in detail in Allegation A-308. Included in this sample were work packages from SUS-36 and SUS-60. No obvious falsification of heat number entries was observed (see Allegations A-35 and A-308).

*Handwritten: additional evidence*  
Heat numbers from the T-B work packages were selected by the NRC staff, and objective evidence was presented to the satisfaction of the staff that the heat numbers were valid, including back-up material test reports (see Allegations A-100 and A-172). The staff's review of T-B turnover packages could not substantiate the allegation. *documentation*

*Handwritten: who were on site at the time of this allegation*  
The NRC staff interviewed six Ebasco document reviewers. They all stated they had no problem obtaining access to contractor records. The Ebasco Site Supervisor of the Quality Control (QC) Verification Group stated that "when requested by the Ebasco Document Reviewers, a questionable or missing heat number would be verified by the QC inspector, who would physically check material for heat number marking" (see Allegations A-97 and A-172). The QC Verification Group was available to any reviewer concerned with falsification of records or any problem with heat numbers. Issues could have been resolved during the review of the packages.

Two specific individuals were alleged to have made heat number changes: one was the T-B Project Engineer, and the other was a T-B QA Coordinator. The NRC staff found that the Project Engineer did not make changes to QA records. The QA coordinator was authorized to change QA records. T-B Inspector certifications are discussed in Allegations A-28, A-304, and A-285b. The T-B

system provided for document changes by authorized personnel. The NRC staff found no evidence that any unauthorized changes were made.

The NRC staff found no evidence of falsified heat numbers. ~~This allegation has neither safety significance nor generic implications. However, it should be noted that the NRC Office of Investigation is also pursuing this issue.~~ [was detected.]

Potential Violations: None.

Actions Required: None.

References

1. Tompkins-Beckwith Procedure TBP-35, Preparation and Control of Process Piping Travelers.
2. Tompkins-Beckwith Procedure TBP-20, QA Records Turnover.

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