

(Rev. 1/21/82)



## NONCONFORMANCE REPORT (NCR)

PROJECT NAME/NUMBER

Wolf Creek 7158

ACTION REQ'D BY

N/A

CONTROL METHOD

 Held 26691  
 Tags 26692  
 26693

O

N

NCR NUMBER

15N12865F

IDENTIFICATION OF AREA AND ITEM

 Quality Engineering  
 Senior G.E. Office  
 Administration Bldg.  
 Corrective Action Reports Book #2

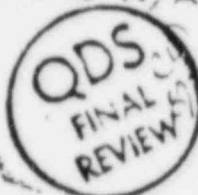
CONTROLLING DOCUMENTS

 AP-XI-12 R.3 Para. 7.1.13 Note  
 Exhibit A Instruction #10  
 AP-XI-12 9/2 Thru R/3  
 (History File)

SYSTEM ID N/A

CDM  
8/25/83

TRAVELERS NO N/A



DESCRIPTION OF NONCONFORMANCE

CAR's 1-P-0027, and 1-P-0028 show no evident ANI review and/or concurrence.  
 CAR 1-W-0019 was written on unapproved document.

(See Attached Sheet)

This is in violation of above procedure,  
 procedural documents and instructions.

RECOMMENDED DISPOSITION &amp; BASIS FOR RECOMMENDATION:

**VOID** : This nonconformance is beyond the normal scope of Quality Inspection's activities and is best controlled and corrected by the Project Quality Engineer. The Project Quality Engineer shall initiate appropriate corrective action and maintain control of this discrepancy through

CAUSE OF NONCONFORMANCE AND ACTION TO PREVENT RECURRENT:

N/A CDM 8/25/83

whatsoever means deemed appropriate,  
 AUTHORIZED NUCLEAR INSP

ACTION TAKEN TO CONTROL NONCONFORMANCE:

N/A CDM 8/25/83

ROUTE TO FOR CORRECTIVE ACTION:

STATEMENT OF COMPLETED ACTION:

VOID: See Basis for Recommendation above.

NCR 15N12865F P

David Moulden PGIM 8/25/83

ACTION COMPLETED

DISTRIBUTION:

DIN CH

R. Williams

KCF MET QA

Disc. Eng.

Originator

Turnover

 David Ross R PGE 8/25/83  
 David Moulden PGIM 8/25/83

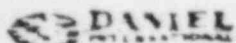
ACTION VERIFIED

TITLE

DATE

 8512180427 851107  
 PDR FOIA  
 BROSIUS84-291 PDR

EXHIBIT (19)



NONCONFORMANCE REPORT (NCR)

CONTINUATION SHEET Page 2 of 2

Project Name: <b>WOLF CREEK - 7158</b>	Action Req By: <b>N/A</b>	NCR Number: <b>15N12865P</b>
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CAR 1-P-0027 Dated 2-16-83 addresses loose jam nuts on piping complete supports.

CAR 1-P-0028 Dated 3-15-83 addresses unidentifiable loose items for small pipe standard supports detailed in MS-25.

The above CARs were written utilizing AP-II-12 R/2. Under para. 4.1.13 which states: Note: For ASME code related activities, review CAR with the Authorized Nuclear Inspector and obtain his initials and date in section IV indicating his concurrence. This statement is also in AP-II-12 R/3 and in the instructions for filling out CA Form, Exhibit A.

CAR 1-W-0019 Dated 8-17-82 addresses re-inspection of fillet welds made prior to April 1, 1981 and was used for a supplement to CARs 1-M-0007 and 1-M-0007-1.

During review of CARs, it was found that CAR 1-W-0019 was initiated on a document similar to Exhibit A but after close review, the document was found not to be the same as any Exhibit A's in any revision of AP-II-12 R/2 Thru R/3.  
R/K 8/22



FOR INFORMATION ONLY

weld was a pipe to elbow fit. The actual condition of field weld FW512 was a pipe-to-pipe fit, which indicated to me that the radiograph for field weld FW512 was in fact a radiograph of a different weld.

*Q.C. PER 16*  
I made a request to the Supervisor of Engineering for DI, Gary JONES, that a new radiograph be taken of the weld. Gary JONES denied my request. I then made the same request to my senior supervisor, Ed SHEVLIN. This request was also denied. Mr. SHEVLIN told me that I had fulfilled my duty by reporting the condition and preparing an NCR. I later learned that the NCR No. 1SN14769PW that I had prepared on field weld no. FW512 had been dispositioned "use as is," with a Bechtel concurrence. I feel the reason that this weld was not repaired was that DI was on a tight time schedule to complete the piping system, and rather than repair the weld or perform another radiograph, a decision was made to cover up this problem in order to meet production schedules. Even though I know of no witnesses, a meeting was supposed to have occurred between Keith HOLLINGSWORTH, DI Project Weld Engineer, Jack MAY, DI Engineer, Ron McCRRANNEY, DI Project Quality Inspection Manager, and Ed SHEVLIN, DI Senior Quality Supervisor, that resulted in a decision to cover up the discrepancies of field weld no. 512.

*about it. Wade Pinckard then requested photographs of the weld to be taken by the site photographer, LOREN COPELAND STEELE. I had made arrangements for these photographs to be made available upon development to the NRC.*

My second concern involving Wolf Creek stems from an instance where I felt I was intimidated by DI's Senior Quality Supervisor, Ed SHEVLIN. On November 30, 1983, Ed SHEVLIN called me and my DI Lead, Howard SIGREST, into his office. Ed SHEVLIN told me that I would cooperate with construction and that he would not have anyone work with him who would not cooperate. At this time, I felt I was intimidated by Ed SHEVLIN. His insistence upon my cooperation was a determining factor for my resignation on December 23, 1983. I felt after this intimidating conversation by such a high-ranking DI official that I could not effectively inspect or perform my inspection duties knowing that I was supposed to cooperate with construction. I felt that this intimidation would keep me from properly performing my duties as a quality control inspector, and it is for this reason that I terminated my employment. After the meeting with Ed SHEVLIN, *LEAD* my Lead, Howard, SIGREST *FEEL* ~~that I had felt intimidated.~~ Howard SIGREST agreed with me at this time and agreed to document, in some type of written form, that this meeting had occurred.

*Paul B. Balle*  
My third concern involving Wolf Creek deals with the technical issue of the quenching of stainless steel welds with the use of water. I am aware of three welds of which I knew that water was used to cool the stainless steel welds. These welds are (1) IM03-BB07QOZECR-17RW308, (2) IM03-BG23QECR-27RW315, and (3) IM03-BG21QECR-16W012A. I am attaching three documents to this statement which supports and clarifies my concerns. Attachment (1) is an inter-office memorandum dated May 26, 1983, Attachment (2) is an inter-office memorandum dated June 9, 1983, and Attachment (3) is a memorandum dated July 21, 1983. All three of these documents concern the quenching of stainless steel welds. This was a standard practice and does not violate code or procedure criteria, however, no action was ever taken after a request was made for procedural changes.

The request for a procedural change was done by a DI Quality Engineer, David MAULDEN who expressed concerns over the use of using water to quench stainless steel welds. David MAULDEN requested that additional justification be put into the procedures for the continuing use of water as a method of quenching stainless steel welds. My concern is that David MAULDEN's request for procedural changes has never been properly addressed.

My fourth concern involving Wolf Creek involves potential quality problems that should have been directed to quality engineering for a response, but were short circuited by DI Supervisor, Richard BOOTH. Richard BOOTH decided that as supervisor he was qualified as a quality engineer to answer potential quality control problems. As a result of Richard BOOTH's decision to short circuit these written requests, potential quality control problems were never addressed by a qualified quality engineer. I am attaching six three-part memorandums, Attachment Nos. (4-9), which will clarify my concern.

8/5/83  
My fifth concern involving Wolf Creek concerns DI Supervisor, Richard BOOTH. During the course of my duties as quality control inspector, I wrote a surveillance report as required by APV114 that was closed-out by Richard BOOTH, with a message "See attached memo." This type of answer violates surveillance procedure. I am enclosing Attachment (10), which is a memorandum from myself to Quality Engineering, and Attachment (11), which is a Quality Surveillance Report dated 5/83. I am also enclosing Attachment (12), which is a Quality Surveillance Report dated 8/8/83. These documents should help clarify my concerns of this issue.

My sixth concern involving Wolf Creek relates to an incident in which vendor spools were cut in half prior to inspections by Quality Control. The traceability of metals was lost because these spools were cut in half prior to inspection. I am enclosing Attachment (13), which is a Quality Surveillance Report dated November 11, 1983, to help clarify this technical issue.

My seventh concern involving Wolf Creek is in the way that changes to the NDE tags on site were processed. I feel that the way it is currently handled violates AP-V1-05, which is a procedure which involves NDE subcontractors. I am enclosing Attachment (14), which is a report entitle Processing of NDE Reports. This attachment should clarify my technical concerns of this issue.

My eighth concern involving Wolf Creek is a problem with generic NCR reports. I feel that the current procedure AP-V1-02 does not contain any requirements that would properly document generic NCR's. I am enclosing Attachment (15), which is a six-page document titled Generic References, which should help clarify this technical issue.

My ninth concern involving Wolf Creek relates to the improper documentation involving the heat number on a piece of traceable metal to be welded to a valve. I do not feel that Supervisor Richard BOOTH adequately handled this documentation. I am enclosing Attachment (16), my notes, which will give more detail to this concern.



My tenth concern involving Wolf Creek involves the use of small hanger parts (load pins and conical washers). I feel that these parts were not tagged in accordance with procedural requirements. I am enclosing Attachment (17), a Quality Surveillance Report No. SR-601-N, and Attachment (18), which are my notes concerning the issue, as documentation that should clarify this technical issue.

My eleventh concern involving Wolf Creek deals with Nonconformance Report No. ISN12865P. This NCR was voided because it was felt that this inspection was beyond the normal scope of a quality inspector activities. I am enclosing Attachment (19), which is Nonconformance Report No. ISN12865P. The details reported in the NCR should clarify my concern on the improper voiding of nonconformance reports. I am also enclosing Attachment (21), which is an inter-office memorandum dated August 20, 1983.

My twelfth concern involving Wolf Creek deals with the problem of using correcting ribbon on a typewriter to make corrections of Nonconformance Reports. I feel this does not meet procedure, and I am enclosing Attachment (22), a memorandum dated 7-14-83, to address these concerns.

My thirteenth concern involving Wolf Creek deals with the improper use of Surveillance Reports. I am enclosing Attachment (23), which are my notes on this generic problem. These notes should help verify my concerns involving improper use of Surveillance Reports. I am also enclosing Attachment (24), which is a Quality Surveillance Report dated 12/15/83, which has not been properly handled. I am also enclosing Attachment (25), which is a Quality Surveillance Report that has not been properly handled. All these documents should help clarify my technical concerns on the improper use of Quality Surveillance Reports.

I have read the foregoing statement consisting of 4 typed pages. I have made and initialed any necessary corrections and have signed my name in ink in the margin of each page. I swear that the foregoing statement is true and correct. Signed on

January 10, 1984 at 10:00 pm  
Paul B. Hale

SIGNATURE: Paul B. HALE

Subscribed and sworn to before me this 10th day of January 1984, at Bloomington, Ill.

INVESTIGATOR: Wendel E. FROST

WITNESS: H. Burke Huff

Wendel E. Frost CI III



## INTER-OFFICE COMMUNICATION

Form 10-99 (Rev. 6-75)

TO: Distribution

FROM: J.J. Grabusky

SUBJECT: CAR-25

DATE: August 20, 1983

P/W: 575

In response to stop work action no F/W-001, we will cease to accept bolting material under Corrective Action Report 1-G-0025 for all large bore pipe supports, and for all small bore variable springs, constant springs, rigid struts, and mechanical shock arrestors. All other small bore MS-25 items and all "U" bolts can be inspected and accepted to Revision 5 of the CAR under the following restriction.

The QIC Supplemental Sheet shall be used for both previously accepted installations, and installations made not Quality accepted or currently being made.

The potential of replacing material of insufficient or incorrect material specification and the possibility of accepting an erroneous material does not exist since all MS-25 bolting material (as quantified with exceptions above) is specified as SA307GrB (or A307GrA as allowed by Code case 1644). In consideration of the above, these items are deemed acceptable and are exempt from the stop work, all previous inspections to the date of the stop work concerning these MS-25 items are acceptable, and no reinspection will be required.

The CAR will be rewritten specifically addressing the concerns of the stop work and will provide the material requirements as well as the allowable identification markings. In addition, the scope will be expanded to include all available information for both catalogue items and subcomponents not specifically identified as a vendor part number.

This revision to the CAR (Rev. 6) will be implemented as a retrofit reinspection for all supports (other than the MS-25 items exempt from the stop work as stated herein) previously accepted to Revision 1 through 4. Revision 5 will not be affected in so far as the scope is limited by this response.

J.J. Grabusky  
Piping/Welding Manager

JJG/TD/LC/lis

cc: J. Cook            D. Mauldin  
     L. Easterwood   J. Warren  
     C. McDonald     L. Corley

J. Fletcher  
A. Early  
J. Grill

EXHIBIT (21)

10CFR50.55e

- (i) A SIGNIFICANT BREAKDOWN IN ANY PORTION OF THE QUALITY ASSURANCE PROGRAM CONDUCTED IN ACCORDANCE WITH THE REQUIREMENTS OF APP. B TO THIS PART

AP-VI-02 E/17 PAGE 4813

PARA. 3.9.

"NONCONFORMANCES MAY BE IDENTIFIED BY ANY PROJECT PERSONNEL OBSERVING A NONCONFORMING CONDITION, HOWEVER, ONLY QUALITY PERSONNEL MAY ORIGINATE A NONCONFORMANCE REPORT AS DESCRIBED IN SECTION 4.1."

10CFR50 APP. B  
INTRODUCTION -

"QUALITY ASSURANCE INCLUDES QUALITY CONTROL, WHICH COMPRISES THOSE QUALITY ASSURANCE ACTIONS RELATED TO THE PHYSICAL CHARACTERISTICS OF A MATERIAL, STRUCTURE, COMPONENT, OR SYSTEM WHICH PROVIDE A MEANS TO CONTROL THE QUALITY OF THE MATERIAL, STRUCTURE, COMPONENT, OR SYSTEM TO PREDETERMINED REQUIREMENTS."

*Leich*

*ATT #10*

MEMO

*Rgr*

TO Jack Cook, PQE

FROM David Mauldin, PQIM

SUBJECT		Clerical errors on NCRs		DATE	7-14-83
MESSAGE	Per our discussions regarding clerical errors on NCRs on 7/13 and 7/14, it is not considered a discrepancy to use correcting ribbon on a typewriter to make a correction on an NCR during the normal processing cycle. The use of correct-tape (tape-over) is prohibited.				
	SIGNATURE				
	DATE				
TO	Do you concur?				
	Thanks - David Mauldin				
	7-14-83				
BY	I concur with the above interpretation.				
	EXHIBIT (22)				
	7/14/83				



AP-VI-14 R/O

3.4 SR'S WILL BE LOGGED AND ASSIGNED A UNIQUE SEQUENTIAL CONTROL NUMBER.

3.6 SR'S WILL BE CLOSED THROUGH CORRECTION OF THE IDENTIFIED DISCREPANCIES, OR THROUGH INITIATION OF NCR'S BY Q. INSPECTORS.

DQS-

3.42 Review SR for adequacy of description and compliance with this procedure

4.2.1 IF THE SR IS CORRECTLY INITIATED OR UNCLEAR, ENTER JUSTIFICATION, SIGN & DATE, RETURN THE SR TO THE QI FOR CORRECTION & RESUBMITTAL, OR PROVIDE FURTHER INSTRUCTION FOR INSPECTOR ACTION.

4.2.2 IF THE SR IS CORRECTLY INITIATED AND THE PROBLEM CLEARLY DEFINED, ASSIGN A SEQUENTIAL CONTROL # & ENTER APPROPRIATE INFORMATION ON THE SR LOG.

**REMARKS:**

DATE:

2004

DATE:

22435

QUALITY INSPECTOR

DATE \_\_\_\_\_





# QUALITY SURVEILLANCE REPORT

SURVEILLANCE REPORT NO. 104

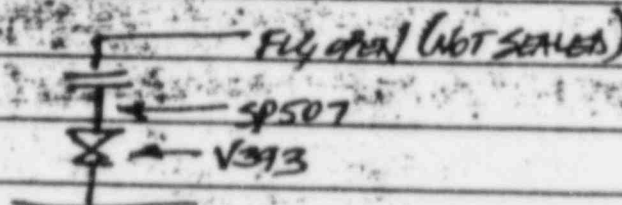
SYSTEM BBOB

LOCATION 2020' EL (APPROX) INSIDE ENT. TO Loop #1 BLA-231

DRAWING/SPECIFICATION/PROCEDURE 1M03-BBOB(0)02 SP507

PURCHASE ORDER NA

DESCRIPTION OF DISCREPANCIES FOUND FLANGE CONNECTING TO SP507 NOT SEALED (OPEN TO CONTAMINANTS).



TAG # 2041 APPLIED

CLOSE BY:

QUALITY INSPECTOR Paul Bole II

DATE 5/22/83

QUALITY SUPERVISOR

DATE

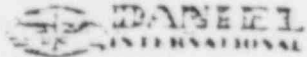
REMARKS:

procedure violation  
write NCR  
Ref WP VII 201  
(RECAP REACH NIGHT)

QUALITY INSPECTOR PB 5-24-83

DATE



*A. JUREST*

## INTER-OFFICE COMMUNICATION

FORM 16-00 (Rev. 6-75)

TO Leonard Johnson/All M/W Quality  
Inspectors (QIC)

FROM Quality Engineering

DATE September 14, 1981

SUBJECT: Quality Engineering Response to Questions Revised during Training  
on QCP-VII-204, Rev. 8

The following is a list of the questions asked by Quality Inspection during the Training classes for QCP-VII-204, Rev. 8 and their respective answers from Quality Engineering

1. Q: Section 1 Item 5B.1 What are the marking requirements for the second strut of a two strut support, if the support was received with only one Code Data Tag on one of the items?  
 A: The second strut must have either a serial number or hanger Mark number identifying the item. *EITHER STAMPED ON THE ITEM OR ON A TAG ATTACHED TO THE ITEM.*
2. Q: Section 1 Item 7 states: Surfaces that shall not be painted-verify to note B. Note B states: No paint shall be on any threaded surface, bushing, Code Data Tag or sliding surface.  
 a. Does this note (paint on sliding surfaces) apply to PG14S, PG15S, PG16S, PG20S and pipe saddles?  
 b. Can we accept a rod hanger if the rod is 6' long and it has some paint on the threads 3' from the connection?  
 A: a. No--this note does not apply to the items stated above, it applies to supports which utilize Teflon plates, Lutrite plates or an alternate designed to minimize friction between the sliding surfaces.  
 b. Yes--you can accept a support if the paint on the rod will not bind the nut on the threads per RCI 1-0503P *ALSO CODE DATA TAG MAY HAVE SOME AS LONG AS IT IS DISCERNABLE. BUSHING - NONE.*
3. Q: Section 1 Item 10 When verifying special instruction sheets, must an NCR be closed before we can sign off this section signifying all instructions on the NCR have been followed including the "action to prevent recurrence"?  
 A: You may sign the QIC prior to the NCR being closed as your signature in the block is to verify that the instructions in the disposition have been adhered to.

*A NOTE ON ALL RCIS STATES - THIS IS NOT TO SUPERCEDE  
PROCEDURAL REQUIREMENTS EXHIBIT (26)*

[illegible]

A: Yes you can use the telephone booth as NOBODY there is when we  
 up to + 5 %.

*Rick Scotto*  
Rick Scotto  
Quality Engineer *RD* 4/15/83

L. M. Johnson mcs  
12/21/83 9/16/83

RS/1ae

*F. Hale*

## INTER-OFFICE COMMUNICATION

Form 16-99 (Rev. 6-75)

TO: *RJM*  
Ron McCraney/Leonard Johnson

DATE: October 25, 1983

FROM: Doug Barone/Tom Dobbins

SUBJECT: Shimming/SGN-1

This correspondence is being generated in order to provide clarification as to the intent of MS-25, SGN-1, Note 7. The subject note addresses the utilization of copper or brass shim material when copper piping systems are encountered during SGN-1 installation applications. This criteria was established in order to compensate for excessive clearance inherent to SGN-1/copper pipe installations as a result of smaller outside diameters when compared to standard nominal pipe diameters. It is not the intention of this requirement to provide for a means of preventing possible contamination resulting from bi-metallic cross contact. An approved alternate to this method of clearance resolution is delineated in Revision 14 of WP-VII-208 which states in Appendix XI: "Small SGN-1 assemblies may be used on copper tube as long as proper fit-up and insulation thickness can be maintained. . . ." One of the purposes of this provision is to allow for substitutions of smaller size SGN-1 supports, specifically, for alleviation of shim installation to compensate for excessive clearance. This prescribed alternative has been approved by Bechtel Engineering via RCI #1-0518-P and is considered acceptable for site utilization.

Please do not hesitate to contact the undersigned for further clarification of this response or any additional inquiries related to the installation of piping component supports.

*IF THIS IS THE INTENT -  
WHY IS IT NOT IN PROCEDURE?*

*[Signature]* 10/25/83  
D. A. Barone  
Senior Quality Engineer

*[Signature]* 10/25/83  
T. Dobbins  
Technical Services Lead Engineer

DAB/lae

cc: J. Cook  
D. Mauldin  
J. Grill





MEMO

• P. McCRAVEY & T. GETZLAFF

TO \_\_\_\_\_

FROM DAVE HUTTEN

SUBJECT MINIMUM THREAD ENGAGEMENT FOR SEAL WELD JOINTS DATE 7-13-82

PLEASE SEE THE ATTACHED SHEET REGARDING LACK OF ANY REQUIRED MINIMUM THREAD ENGAGEMENT FOR JOINTS THAT ARE SEAL WELDED.

SIGNATURE DATE

FORWARD PARTS ONE AND THREE TO PERSON ADDRESSED

SIGNATURE DATE

ASME III DOES NOT ADDRESS THREAD ENGAGEMENT FOR PIPE JOINTS, SEAL WELDED OR NOT.

THE PURPOSE OF A SEAL WELD IS TO SEAL; STRENGTH SHOULD COME FROM THE THREADS. ACCORDINGLY, THE JOINT SHOULD BE TIGHTENED AS IF NO SEAL WELD IS TO BE MADE. IF, AFTER TIGHTENING, EXCESSIVE THREAD STILL SHOWS ON THE PIPE, IN ALL LIKELIHOOD THE PIPE IS OVERTHREADING. IN THAT CASE, PROPER THREAD LENGTH COULD BE RESTORED BY CUTTING THE PIPE.

ALTHOUGH DANIEL HAS NO PROCEDURAL STANDARD FOR PIPE THREAD LENGTH, THE FOLLOWING DATA FROM "MARKS' STANDARD HANDBOOK FOR MECHANICAL ENGINEERS" (CITING ANSI B2.1) MAY BE USEFUL AS A GUIDELINE:

PIPE SIZE	TH'D LGTH
1/4"	.59"
3/8"	.60"
1/2"	.78"
3/4"	.79"
1"	.98"
1 1/4"	1.01"
1 1/2"	1.03"
2"	1.06

*Danette H. [Signature]*  
QE

ATTACHMENT 30

AICO

UTILITY FORMS

REORDER SNAP-IT<sup>TM</sup> FORM  
NO. 45001 250/CTN-45002 50 PK  
3 PART

MEMO

TO: Ron McCreary  
SM/WQS

FROM: David Fhea, CC

SUBJECT

M-060202B(Q) Rev 4, Note 21

DATE

7-13-82

MESSAGE

This memo is to confirm our earlier conversation regarding above subject.

Weld length which exceeds the length of required by drawing is permissible (except on clip angles, piping attachments, and attachments to beam flanges) but the excessive length must meet the same requirements as the required length.

SIGNATURE

DATE

If you have any questions, please contact.

David Fhea, 7-13-82

SIGNATURE

PRINTED IN USA

UTILITY FORM NO. 45001 250/CTN-45002 50 PKG

FORWARDED PARTS OF THIS MESSAGE TO PERSON DISCLOSED

EXHIBIT (30)

# AICO

## UTILITY FORMS

REORDER SNARE™ FORM  
NO. 45001 250 CTN. 45002 50 PKG.  
3PAR™

### MEMO

ATTACHMENT **31**

RJM  
FROM: **RON McCRANEY**  
Dalton Riche

TO: **PQE**  
**LARRY Phillips (4p 7-16-82)**

FROM

**TOM STUCKEY**

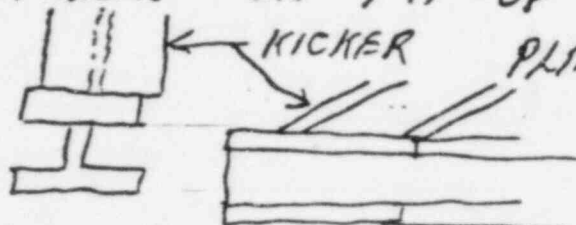
SUBJECT

**OVERHANGER**

DATE

**7-16-82**

WOULD A  $\frac{1}{16}$ " OVERHANG ON A TV HANGER  
BE ACCEPTABLE ON FIT-UP OR FINAL INSPECTION  
PLEASE GIVE GUIDE LINES



*T. Stucky*

SIGNATURE

**Ron McCRANEY / T. Stucky**

Per Section III-App. K

DATE

**7/21/82**

Recommended maximum lateral deviations between  
centerline of web and centerline of flange of build up "Wor's"  
members at contact surface shall be  $\frac{1}{4}$  in. max. The fillet  
weld shall be full length of the contact surfaces.

**Eric D. Ryzden**

UTILITY FORM NO. 45001 250 CTN. 45002 50 PKG.

*E. Ryzden*

SIGNATURE

PRINTED IN U.S.A.

DETACH AND RETAIN THIS PART FOR FOLLOW UP

**PER WHAT?**

**11/29/83**

**NOT ADDRESSED  
IN PRECEDURE  
BN 1-7-84  
EXHIBIT (31)**



44  
37  
**AICO**

**UTILITY FORMS**

REORDER SHAPED™ PDS  
NO 45001 250 CTN 45002 50 P  
3 PART

**MEMO**

ATTACHMENT 13A

TO ~~DAVID MAULON, PGE~~ *D. Rhea*

FROM *LARRY ADKISON*  
DAYS TRAINING

SUBJECT

PROCEDURE CLARIFICATION - PWHT.

DATE  
7-26-82

Neither CWP 500 R/3 NOR QCP VII 500 R/3 ADDRESS INSPECTION  
OF THE SPOOL AFTER COMPLETION OF THE HEAT TREATMENT PROCESS.  
PWHT COULD EASILY RESULT IN DEFECTS SUCH AS ARC STRIKES, CRACKS, ETC  
DOES THE INSPECTOR HAVE THE RESPONSIBILITY OF INSPECTING THE SPOOL  
AFTER PWHT PROCESS. SHOULD THIS BE A HOLD POINT?

*Larry Adkison*

SIGNATURE  
*Larry D. Adkison*

DATE

*No, None Required.*

*JAC 7/28/82*

*R. McGraw*

FORWARDED

ITEMS ONE AND THREE TO PERSON ADDRESSED

*7-28-82*

SIGNATURE

PRINTED IN USA

EXHIBIT (B2)

# AICO

## UTILITY FORMS

REORDER SNARE™ FORM  
NO. 45001 250/CTN 45002 50 PKG  
3 PART

### MEMO

ATTACHMENT (3)

J. Ayres

TO: ~~DAVID MULDIN, PGE~~

FROM: LARRY  
ADKISON

SUBJECT

PROCEDURE CLARIFICATION QLP VII 500 R/3 Para. 4.4 DATE 7-26-82

"Review Hunt Treatment Request Report for completeness and authenticity"

This is a generic Form Filled out by The Inspector. How can  
the inspector verify authenticity? Should this be accuracy  
instead of authenticity? Thanks, Larry Adkison  
SIGNATURE

Larry Adkison

DATE

IN process revision of QLP-VII-500 will delete  
this 4.4 wording.

JAC 7/26/82

P. Mulroney

UTILITY FORM NO. 45001 250/CTN 45002 50 PKG

DATE 7-26-82

SIGNATURE

PRINTED IN U.S.A.

FORWARDED PARTS ONE AND THREE TO PERSON ADDRESSED

EXHIBIT (33)

# AICO

## UTILITY FORMS

REORDER SNAP E2™ FORM  
NO. 4500 250 CTN 45002 50 PKG  
3 PART

### MEMO

~~David Mauduit~~ J. Ayres

ATTACH 34

T  
O

F  
R  
O  
M

LARRY ADKISON  
QATS TRAINING

CE. O. Eiken

SUBJECT

PROCEDURE CLARIFICATION QCP VII 500 4.6 R/3

DATE

7-26-82

"Assure proper removal of welded attachments and NDE of effected areas as required." As required by what? I suggest revision similar to ".... As required by CWP 506 4.16 for removal of temporary attachments." Temporary attachments have been and continue to be controversial items with inspectors.

Any clarification would be helpful. Thanks

SIGNATURE

Larry Adkison

DATE

Ron McCraney and Larry Adkison

This comment will be incorporated into a future Revision (5) of QCP-VII-500.

JAC 7/28/82

UTILITY FORM NO. 4500 250 CTN 45002 50 PKG

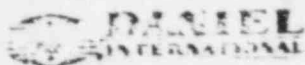
FORWARD PARTS ONE AND THREE TO PERSON ADDRESSED

SIGNATURE

PRINTED IN U.S.A.

EXHIBIT (34)

ATTACHED 35



INTER-OFFICE COMMUNICATION

Form 10-99 (Rev. 6-75)

TO: Larry Phillips, M/W QS

DATE: June 11, 1982

FROM: Mickey Pfeiffer, SQES

SUBJECT: Oversized Fillet Welds

The most critical factor when determining acceptability of weld size is to verify that the minimum specified size is met or exceeded. There are no Project requirements existing which define maximum allowable weld size. As long as design requirements are met and no visible distortion of either member is present, the weld should be considered acceptable when verifying size.

As an accepted industry standard, use two (2) times the design size. Anything greater than this should key the Inspector to pay closer attention to evidence of distortion. If excessive distortion is suspected, contact the responsible Engineer to perform an evaluation. Two (2) times the design size is not accept/reject criteria, only a guideline as described above.

*Is this in procedure?  
BH 1-7-84*

*M. L. Pfeiffer*  
Mickey Pfeiffer  
Senior Quality Engineering Supervisor

MDF/DTR/law

cc: 1. James  
1. Mauldin

EXHIBIT (35)

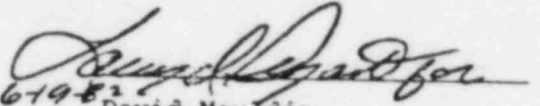


## INTER-OFFICE COMMUNICATION

Form 36-99 (Rev. 6-75)

TO Ron McCraney DATE June 19, 1982  
FROM: David Mauldin PQE - 135  
SUBJECT: Documentation of Special Scope Systems Weld Battering

This memo is written to clarify the documentation requirements for weld battering on Category II/I, D'Augmented, Fire Protection, and non-seismic Category I applications. Since the redefinition of Special Scope requirements in early June, 1982, Traveler documentation has be revised to use the Special Scope Weld Record rather than the Weld Control Record (Fl01). Welding inspection by Quality is required only for final visual on welds, therefore, no requirement exists for Construction to document weld battering, or for Quality to verify the battering process.

  
6-19-82  
David Mauldin  
Project Quality Engineer

CDM;rek

xc: Bill Friedrich  
Erbie Flynt



(ATTACHMENT 31)

*Copy to  
Devitt  
of each  
all inspectors  
10-21-8*



Form 16-99 (Rev. 6-75)

INTER-OFFICE COMMUNICATION

TO I. B. James

DATE: October 21, 1980

FROM: B. A. Seabury

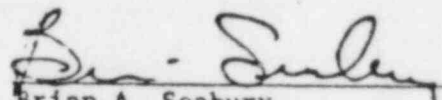
PME #345

SUBJECT: HVAC Hanger to Square Embed Sleeves

Drawing C-0017 and C-0019 show two (2) details of square embed sleeves. One Detail (Detail 3 on C-0017) is Non-Q, the other (Detail 3 on C-0019) is "Q". The way the details are fabricated are in such a way that, when an HVAC Hanger welds to the outside edge of the sleeve, a crack exists where the angles meet; thus producing a leak during operation. Bechtel states that Spec. M-618.3, Para. 5.2.2, and M-635.3, Para. 5.2.2 allows us to make a seal weld at the point of the leak; i.e., the cracks.

Engineering requests that on "Q" embed sleeves, QC check the gap, fitup, preheat, and do a final inspection of the seal welds on the sleeve. All work will be documented on a Miscellaneous Structural Steel Card. Weld Procedure will be N-1-1-A-8, and weld size will be in an "as-is" condition after grinding flush.

Your cooperation is greatly appreciated in this matter.

  
Brian A. Seabury  
Project Mechanical Engineer

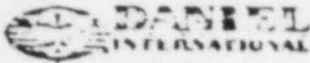
BAS/dlr

cc: TT Annas

EXHIBIT (37)

ATTACHMENT *in*

*copy  
1) all Supervisors  
2) all Leads  
-7*



INTER-OFFICE COMMUNICATION

Form 16-99 (Rev. 6-75)

*A* TO: Tom Reynolds

DATE: February 23, 1982

FROM: David Mauldin

PQE - 065

SUBJECT: Separation between members of NF Supports and the subsequent additional fillet weld size requirement.

Recently we encountered a situation whereby the integrity of a previously accepted NF support fillet weld was in question because of a separation between two wide flange members.

Governing drawings require a  $\frac{1}{2}$  inch fillet weld on the web and inside flanges of the vertical member to the outside flange of the horizontal member. (See attachment). Upon reinspection of this weld, a gap was noted at point A of  $\frac{1}{8}$  inch, which according to the assigned weld procedure (N-1-1-A-6A), should have increased the fillet size to  $\frac{3}{8}$  inch. The weld as applied is  $\frac{1}{2}$  inch.

Obviously, additional fillet size is required, but as previously stated, this weld was visually inspected and accepted in 1980, and per the definition of CWP-504, falls into the category of a completed weld. However, CWP-504 allows the addition of filler metal to a completed weld only after the elimination of a subsurface defect. The above situation does not fall into this or any defined weld category of CWP-504.

In an attempt to settle this matter as expeditiously as possible and with the least amount of paperwork, Bill Friedrich, Jim Madril and I reached the agreement that this and future situations of this nature could be handled as follows:

1. Document the discrepancy on a surveillance report.
2. Generate a supplemental Weld Control Record in accordance with WP-VII-209.

*EXHIBIT (38)*

3. Additional welding to be performed, inspected and documented per requirements of the original and supplemental WCR.

This will identify the discrepancy and will take positive and documented steps to correct the discrepancy, and will avoid the use of a deficiency report.

I would recommend that CWP-504 be revised as soon as is practical to identify this type occurrence and the above solution to the problem.

Your assistance in this matter is greatly appreciated.

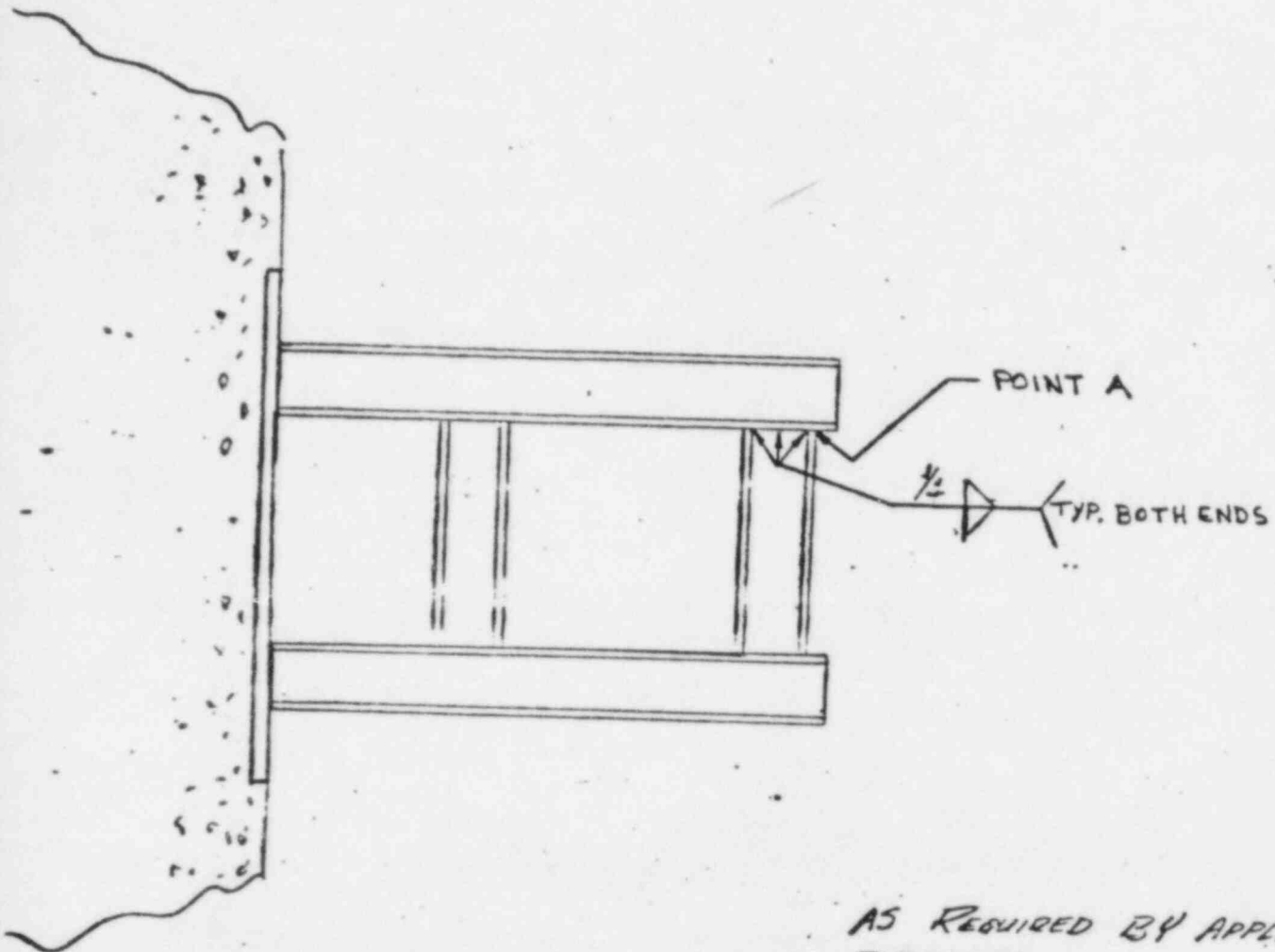
David Mauldin PC 2-23-92

David Mauldin  
Project Quality Engineer

(W/Att.)

CDM/DTR;rek

xc; W. Friedrich  
J. Grabusky  
T. James  
J. Johnson  
J. Madril  
L. Bryant



AS REQUIRED BY APPLICABLE  
DRAWING.

$\frac{1}{8}$  INCH GAP AT POINT A.

DURING YOUR INVESTIGATION YOU SHOULD TALK TO STEVE FRENCH, RICK BURRICK, AND DALTON RICHIE CONCERNING THE FOLLOWING. DAVID FLOWERS (NOW EMPLOYED AT THE VOGUE PLANT OUTSIDE AUGUSTA, GA.) WAS CALLED TO DO A FINAL INSPECTION IN THE REACTOR FUEL POOL ON A PLATE NEEDED TO THE WALL. UPON FINDING NO HEAT ON THE ITEM HE REFUSED TO SIGN THE FINAL. DALTON RICHIE SIGNED FOR THE VERIFICATION OF THE HEAT & TRANSFER (AFTER THE FACT) ON THE ITEM. IF A HEAT WAS ON THE ITEM, IT IS ON THE BACK SIDE - NOT VISIBLE TO HUMAN EYES. STEVE FRENCH & RICK BURRICK ALSO WOULD NOT SIGN THE FINAL. DALTON RICHIE ESTABLISHED TRACEABILITY BY HIMSELF. SEVERAL TIMES I CHALLENGED DALTON ON THIS & HE WOULD NOT TALK ABOUT IT. HE IS A CORRUPTED INDIVIDUAL, TYPICAL OF ALL LEADS & SUPERVISORS AT WCGS. IN MY OPINION HE SHOULD BE PROSECUTED FOR HIS DEALINGS AT WOLF CREEK.

ENCLOSED IS SOME MORE INFORMATION I FOUND AFTER MOVING HERE WHICH MAY BE PERTINENT TO YOUR INVESTIGATION.

PLEASE TALK TO JIM LLOYD CONCERNING WHAT RON McCRANEY SAID AFTER HE FIRED ME. CONTACT ME AT YOUR CONVENIENCE SHOULD YOU NEED ANY ASSISTANCE.

Thank You

Paul B. Balle



A1

E4617C

PLACE:

Phamada Inn

DATE: 1-10-84

I, Paul B. HALE, hereby make the following voluntary statement to Wendel E. FROST and Brooks H. GRIFFIN, who have identified themselves to me as Investigators with the U.S. Nuclear Regulatory Commission. I make this statement freely with no threats or promises of reward having been made to me.

I was previously employed by Daniel International Corporation (DI) as a Quality Control Inspector at the Wolf Creek Nuclear Power Station, Burlington, Kansas. I held that position for approximately 20 months and left DI's employment on December 23, 1983.

My first concern involving Wolf Creek stems from an incident that occurred to me in December 1983. I was called to do a cleanliness inspection, both internal and external, in the Pressurizer Room. Upon looking inside a horizontal run of pipe, a visual defect was noted. The piping in question is ID loop piping that comes out of the top of the pressurizer and is safety-related pipe. The weld with the defect that I am referring to is Field Weld No. FW512, reference Drawing No. IM13-BB04Q. The visual defect that was noted in the weld was excessive penetration of unconsumed filler, this is commonly referred to as a melt-through or a burn-through. This defect can be observed visually as unmelted portions of filler wire extrude from the weld and can be seen visually. Upon viewing this discrepancy, I asked the pipe fitter to call the DI Foreman, Robert ATKINSON, and the DI Welding Superintendent, Bruce HARDEN, to the Pressurizer Room. Bruce HARDEN related to me that a meeting had transpired earlier that day between himself and DI Project Welding Engineer, Kieth HOLLINGSWORTH. The results of this meeting were that even though both men knew that the weld did not meet acceptable standards and approved procedures on the site, no repair would be done on the weld because an acceptable radiograph was on file with Quality Control. I then asked for the DI Weld Engineer, Jack MAY, and his assistant, Gerald DOLNEY, to be present. Both men were summoned to the Pressurizer Room at this time. All the above mentioned personnel then looked inside the pipe and agreed that the weld was not acceptable. I then asked Jack MAY to issue weld repair instructions. Again Mr. MAY said that he couldn't because the weld had an acceptable radiograph on file with the Quality Control Department. He told me that he believed we had a possible 5055E reportable violation "on our hands." I told Jack MAY not to be using those words so loosely at the time. Gerald DOLNEY (supra) expressed his concern that he wanted to talk to upper management about the problem; however, I suggested to Jack MAY that the proper thing to do was to write an NCR. I then requested verbally from Jack MAY a reshot of the radiograph of field weld no. FW512. Jack MAY again refused the request, basing his decision on the fact that an acceptable radiograph was on file.

At a later time, I was unable to take a look at the radiograph that was supposed to have been for field weld 512. The Radiograph Report Number was PBTR76813. This radiograph indicated that the joint configuration of the

EXHIBIT (20)

page 65

Page 1 of 4 pages

Paul B. Hale

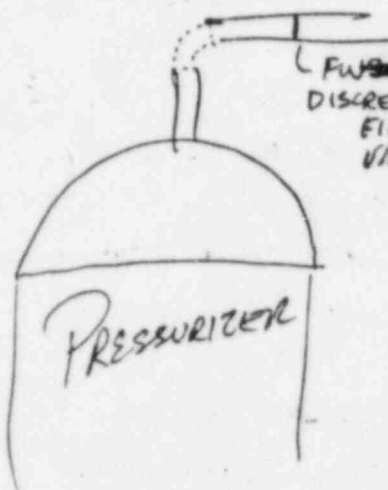
TO: WENDELL FROST  
FROM: PAUL B. HALE  
DATE: DEC. 27, 1983  
SUBJECT: WOLF CREEK GENERATING STATION: QUALITY CONCERNS.

Page #1

THIS IS IN RESPONSE TO OUR PHONE CONVERSATION. ENCLOSED YOU WILL FIND NUMEROUS ITEMS WHICH WERE OBTAINED DURING MY EMPLOYMENT WHICH ENDED 12-23-83 AT WOLF CREEK.

AS WE TALKED ABOUT NOT LONG AGO - THE CIRCUMSTANCES WHICH PROMPTED MY CALLING YOU - I WILL TRY TO RELATE TO YOU:

I WAS CALLED TO DO A CLEANLINESS INSPECTION (INTERNAL AND EXTERNAL) IN THE PRESSURIZER ROOM. UPON LOOKING INSIDE HORIZONTAL RUN OF PIPE, THE VISUAL DEFECT WAS NOTED.



15N14769PW

FW-512  
DISCREPANT WELD: EXC. PENETRATION UNCONSUMED FILLER, MELTHROUGH, BORNTHROUGH. DEFECT VISUALLY.

UPON VIEWING THE DISCREPANT CONDITION, I ASKED THE FITTER TO CALL THE <sup>DAVID</sup> FOREMAN - ROBERT ATKINSON, AND THE <sup>DAVID</sup> WELDING SPT - BRUCE HARDEN TO THE PRESSURIZER ROOM. <sup>DAVID</sup> BRUCE SAID A MEETING HAD TRANSPIRED EARLIER THAT DAY WITH KEITH HOLLINGSWORTH. THEY SAID THEY KNEW THE WELD WAS BAD BUT HAD AN ACCEPTED RT REPORT FOR THAT WELD. I ASKED FOR THE <sup>DAVID</sup> WELDING ENG - JACK MAY AND HIS ASSISTANT GERALD DOLNEY TO BE PRESENT. THEY WERE SUMMONED TO THE PRESSURIZER ROOM. ALL THE ABOVE MENTIONED PERSONNEL LOOKED INSIDE AND AGREED IT WAS NOT ACCEPTABLE. I ASKED JACK MAY TO ISSUE WELD REPAIR INSTRUCTIONS. HE SAID HE COULDN'T BECAUSE THAT WELD HAD BEEN QC/RT ACCEPTED. HE SAID HE BELIEVED WE HAD A (OVER)

R-10

"SO. SSE" ON OUR HANDS." I TOLD HIM NOT TO BE USING THOSE WORDS SO LOOSELY AT THAT TIME. GEROLD DOLNEY WANTED TO TALK TO UPPER MANAGEMENT, BUT I TOLD JACK <sup>THAT</sup> THE ONLY THING I COULD DO WAS WRITE AN NCR. I REQUESTED, VERBALLY, A RE-SHOT OF THE RADIOGRAPH OF THAT WELD AS THE RT REPORT BY PBT-RT- 6813 INDICATES THAT THE JOINT CONFIGURATION IS A PIPE-TO-ELBOW. THE ACTUAL CONDITION IS PIPE-TO-PIPE. WHICH INDICATES TO ME THAT ALL ACCEPTED (RT) WELDS AT WOLF CREEK COULD POSSIBLY BE REJECTED AS THIS WELD IS. THE REQUEST FOR ANOTHER RT WAS DENIED BY MY SR. SUPERVISOR G. SEULIN WHO SAID I HAD DONE MY DUTY BY REPORTING THIS CONDITION. SUBJECT NCR ISN 14769 PW WAS CLOSED "150-AS-13" WITH BECAVEL CONCURRENCE.

WADE PINKARD - DAY SHIFT CC for DANIEL AT EXT. 1391 REQUESTED THAT THE SITE PHOTOGRAPHER TAKE PICTURES OF THIS WELD WHICH WAS DONE BY COREN STEELE. WADE SAID THE PICTURES (150-AS-13) WILL BE AVAILABLE THE 1<sup>ST</sup> WEEK IN JANUARY. PLEASE CONTACT HIM & HE WILL DELIVER THOSE TO YOU.

PLEASE ALSO FIND ENCLOSED NUMEROUS ATTACHMENTS (APPROPRIATELY NUMBERED) WHICH SHOW QUALITY CONCERNS AT WOLF CREEK ATTACHMENT #1:

#### QUENCHING OF STAINLESS STEEL WELDS.

MR. D. MAULDIN (PQE AT THE TIME) ADMITS THAT HE AGREES THAT IT IS A STANDARD RECOMMENDED PRACTICE and DOES NOT VIOLATE CODE AND/OR PROCEDURAL CRITERIA. HOWEVER NOTHING WAS EVER DONE AFTER HE REQUESTED PROCEDURAL CHANGES TO INDICATE THIS BEING AN ACCEPTABLE PRACTICE.

THE WELDS WHICH I KNOW WATER WAS USED ARE:

1M03-BB07(G) 02 ECR-17 RW308

1M03-BB23(G) ECR-26 RW315

1M03-BG21(G) ECR-16 W012A

NEXT  
PAGE

ATTACHMENT #2:

(6) SIX 3-PART MEMOS REGARDING POTENTIAL QUALITY PROBLEMS ADDRESSED TO Q.E. BUT NEVER DELIVERED AS R. BOOTH DECIDED AS A SUPERVISOR THAT HE WAS QUALIFIED AS A Q.E. TO ANSWER THESE QUESTIONS.

ATTACHMENT #3:

SURVEILLANCE REPORT WRITTEN, NO CONTROLLING # AFFIXED AS REQUIRED BY AP-VI-14. ONLY ANSWERED BY R. BOOTH AS "SEE ATTACHED MEMO." THIS VIOLATES SURVEILLANCE PROCEDURE.

ATTACHMENT #4

SELF-EXPLANATORY. SAME AS ABOVE. CUTS WERE MADE ON VENDOR SPOOLS. QUALITY WAS TO VERIFY PRIOR TO CUTTING. HOWEVER CRAFT CUT SPOOLS THEN NOTICED PROBLEM.

LEAD INSPECTOR SIGNED TRACEABILITY MAINTAINED IN QC CAGE ON 2000' EZ. - HE DID NOT EVEN GO OUT TO LOOK AT SPOOLS WHICH WERE CUT. R. BOOTH SAYS THAT IS O.K. THIS SHOULD BE 50.55E. IF LEADS ARE ALLOWED TO SIGN OFF VERIFICATIONS IN OFFICE, THEN WHY DO WE HAVE QUALITY TO VERIFY TO BEGIN WITH?

ATT #5

CHANGE IN WAY NDE TAGS ARE PROCESSED. VIOLATES AP-VI-03 - NDE SUBCONTRACTS.

ORIGINATED BY RON MCCRANCEY TO "SPEED-UP" DELAYS IN CONSTRUCTION AND NDE SERVICES.

ATT #6

LIST OF "GENERIC" NCR'S. AP-VI-02 DOES NOT CONTAIN ANY REQUIREMENTS TO DOCUMENT GENERIC NCR'S.

PLEASE TAKE NOTE OF ISN 8693 PW (WHITE-OUT) (ISN 8824 PW) <sup>Same</sup>

OVER



ATT. #7

SELF-EXPLANATORY. PLEASE TALK TO INSPECTORS MENTIONED:  
LONDON SWADLEY, BOBBY RAINS, DALTON RICKE.

ATT #8

SELF-EXPLANATORY.

ATT #9

ISN 1286SP ORIGINATED BY MW01. D. MAULDIN STATES  
IT IS BEYOND THE NORMAL SCOPE OF OIL ACTIVITIES. SINCE WHEN  
IS A QUALITY PROBLEM OF ANY NATURE OUTSIDE THE SCOPE  
OF A QUALITY INSPECTOR. THIS IS INTIMIDATION AT A MINIMUM!

ATT #10

SELF-EXPLANATORY. THE ONLY PROBLEM WITH USING CORRECTION  
RIBBON IS THAT WP-VII-209 STATES ALL CORRECTIONS  
SHALL BE MADE BY SINGLE-LINE THROUGH OF THE ERROR.  
THERE PRESENTLY IS NO PROCEDURAL ALLOWMENT WHICH  
STATES THE USE OF CORRECTING RIBBON IS ACCEPTABLE.

ATT #11

PROCEDURAL REQUIREMENT FOR SURVEILLANCE REPORTS.

OTHER PROBLEMS:

PER CONVERSATION WITH FRANK CARYL EXT 1391-2.  
HE STATED THAT THERE IS NO PIPING INSTALLATION PROCEDURE  
FOR NON-O. HOW WAS ALL OF IT INSTALLED W/O PROCEDURE?

ISN 14003 PW - CARBON CONTAMINATION ON S/S PIPING.

DISPOSITION - BLEND AREAS TO REMOVE CONTAMINATION.

Problem: REMOVAL OF CONTAMINATION CANNOT BE VERIFIED VISUALLY.  
AN ACID TEST IS REQUIRED.

NEXT PAGE

QUALITY PROBLEMS AT WOLF CREEK

NF 3274 STATES HYDRAULIC SNUBBERS ONLY.

WHY DOES WOLF CREEK USE MECHANICAL SHOCK ARRESTORS?

ISN 12481 P - CAUSE 3 NCR

ENG. ERROR - ENGINEER SIGNED IN QC SPACE (NDE TAGS)

WHEN NO QUALITY INSPECTORS COULD BE LOCATED ON SITE.

WORK BEING PERFORMED W/O QUALITY INVOLVEMENT ON JOB.

EXHIBITS LACK OF CONTROL BY QUALITY UPON CONSTRUCTION.

ON 11-30-83 Ed SHEVLIN CALLED ME AND MY LEAD, HOWARD SIGREST, INTO HIS OFFICE. HE SAID I WOULD CO-OPERATE WITH CONSTRUCTION, THAT HE WOULD NOT HAVE ANY ONE WORK FOR HIM WHO DID NOT CO-OPERATE. PLEASE ASK HOWARD ABOUT THIS INCIDENT. IN MY OPINION I WAS INTIMIDATED BY MR. SHEVLIN. HIS INSISTENCE UPON MY CO-OPERATION WAS A DETERMINING FACTOR FOR MY RESIGNATION. I CANNOT EFFECTIVELY INSPECT OR PERFORM MY INSPECTION DUTIES KNOWING THAT I MUST CO-OPERATE. THAT WAS NOT IN MY CONTRACT FOR EMPLOYMENT.

ISN 8023 PW - WHITE-OUT USED ON DISPOSITION.

ISN 6259 PW - CORRECTING RIBBON

ISN 10784 PW - " " - RETURNED TO BECHTEL.

REFUSED TO CHANGE CORRECTLY.

ATT #12

ANOTHER SURV. REPORT, IMPROPERLY DISPOSITIONED BY R. BOOTH.

ATT #13:

SAME AS ABOVE. ONE FLANGE NOT CLOSED (INITIATE NCR)  
ONE FLANGE NOT CLOSED ("DALTON, HAVE CRAFT RESEAL PROPERLY") WHY NOT NCR BOTH?