

July 31, 1984 Draft of
BROOKHAVEN NATIONAL LAB CPSES TRT
AUDIT PLAN for AREA II
DBA TESTING
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- 1.0 Review regulations, Safety Analysis Reports, and specification requirements which establish the DBA test performance requirements for Service Level I coatings.
 - 1.1 Summarize or provide direct reference to the required performance parameters for coatings at CPSES. *00
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- 2.0 Identify DBA tests results (supplied from any source) which apply to CPSES coatings.
 - 2.1 List the applicable reports, coating materials, and significant test variables of each report. *00
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- 3.0 Examine and evaluate available documentary evidence which provides a record of the specific surface preparation tools used for hand and power tool cleaning of steel substrates.
*10 @II @IV @VII
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- 4.0 It has been established that there is a time period during which there was no inspection work performed (or inspection records) to establish the acceptance of surface roughness prior to coating application. Establish that this practice occurred where hand or power-tool cleaning was employed as a surface preparation method.
- 4.1 Verify the reported time period of this practice by a survey of inspection reports.
- 4.2 Lacking suitable inspection records, examine and evaluate other documents which demonstrate that hand and power tool cleaning performed during the affected period was adequate to provide the degree of surface roughness to provide good coating adhesion. *10
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- 5.0 Lacking documents which plainly establishe that the tools employed provided adequate surface roughness, examine and evaluate other documents providing an engineering basis (supported by testing results) adequate to provide confidence in the suitability of surface preparation work performed by hand and power tool cleaning. *10
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- 6.0 Examine DBA qualification test results which provide additional information on the performance of coating systems applied over hand or power-tool cleaned steel for the coatings employed at CPSES.
- 6.1 Establish the basis on which the results of such testing may be applicable to the coating work performed at CPSES. *10
@VII
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- 7.1 Examine inspection reports (IR's) which record the application of inorganic zinc coatings (e.g. Carboline CZ-11) or organic primers (e.g. Carboline #191) overlapped onto adjacent epoxy coatings at areas of touch-up or repair.
 - 7.2 Examine any DBA tests which provide an analysis of the results of this practice.
 - 7.3 Verify that an analysis has been performed to establish the extent of areas at which inorganic zinc-coatings have been applied to epoxy coatings.
 - 7.4 Verify that an analysis has been performed to establish the extent of areas at which organic primers have been applied over epoxy coatings.
 - 7.5 Verify that the results of these analyses have resulted in appropriate actions. *15 @IV @VII
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8.0 Verify the applicability of DBA testing which serves to
qualify coatings applied to equipment or components
off-site. *3 @VII

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9.0 Verify the DBA qualification status of Imperial coatings for use in containment in the sequence 11S/1201/11S/1201 or in the sequence 11S/1201/11/1201. *1 @VII

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- 10.0 Review any DBA test results which describe the performance of coatings applied in sequences other than those supplied by manufacturer's published application bulletins.
- 10.1 Establish whether the results of such testing are applicable to areas at CPSES where coatings have been applied in sequences not provided by the manufacturer. *2 @VII
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11.0 Verify that the thicknesses of the coatings tested as reported on Carboline report #01684 correspond to the specified thickness for these materials as applied at CPSES.
*5

AUDIT QUESTION MATRIX
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Kear 8/11/84
BM - from N. J. ...

ALLEGATION NUMBER	AUDIT AREA NUMBER						
	1	2	3	4	5	6	7
1...OPEN.....		S.....					P
2...OPEN.....		S.....		S.....			P
3...OPEN.....		S.....		S.....		S.....	P
4...OPEN.....							P
5...RESOLVED.....		P.....					
6...OPEN.....							P
7...RESOLVED.....				P.....			
8...RESOLVED.....		no further action planned.....					
9...RESOLVED.....		no further action planned.....					
10..OPEN.....		P.....		S.....			S
11..RESOLVED.....							P
12..OPEN.....		S.....					P
13..OPEN.....							P
14..OPEN.....						*	
15..OPEN.....		P.....		S.....			S
16..OUT OF SCOPE.....		*					
17..OPEN.....				P.....			
18..OUT OF SCOPE.....				P.....			
19..OPEN.....		P.....		S.....	S.....		
20..RESOLVED.....		no further action planned.....					

P = primary audit questions
S = supporting audit questions
* = not yet addressed by audit

AUDIT QUESTION MATRIX
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ALLEGATION NUMBER	AUDIT AREA NUMBER	1	2	3	4	5	6	7
21..OPEN.....	P.....				S.....			
22..OPEN.....						*		
23..RESOLVED.....	further input requested.....							
24..OPEN.....					*			
25..RESOLVED.....					*			
26..OPEN.....					P.....			
27..RESOLVED.....					P.....			
28..OPEN.....					P.....			
29..RESOLVED.....	no further action planned.....							
30..RESOLVED.....								P
31..OPEN.....								P
32..OUT OF SCOPE.....	no further action planned.....							
33..OPEN.....					P.....			
34..OPEN.....					P.....			
35..OPEN.....						P.....		
36..OPEN.....								P
37..OPEN.....	P.....							
38..RESOLVED.....								
39..RESOLVED.....					P.....			
40..OPEN.....							P.....	

P = primary audit questions
S = supporting audit questions
* = not yet addressed by audit

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ALLEGATION NUMBER	AUDIT AREA NUMBER						
	1	2	3	4	5	6	7
41..OPEN.....				S.....		P.....	
42..OPEN.....				P.....			
43..OPEN.....				P.....			
44..OPEN.....					P.....		
45..OPEN.....				P.....			
46..RESOLVED.....				*			
47..OPEN.....	*						
48..OPEN.....				S.....			P
49..OPEN.....				P.....			
50..OUT OF SCOPE.....						P.....	
51..OPEN.....				P.....		S.....	
52..OPEN.....						P.....	
53..OUT OF SCOPE.....					P.....		
54..OUT OF SCOPE.....	*				*		
55..OPEN.....	*						S
56..OUT OF SCOPE.....							
57..OPEN.....	*						
58..OPEN.....				*			
59..OUT OF SCOPE.....	*						
60..OUT OF SCOPE.....	*				P.....		

P = primary audit questions
S = supporting audit questions
* = not yet addressed by audit

(SIC) 282 3000 TRANSMIT

2547 CONFIRM

TO: VINCE LETTIE

BLDG #130

(SIC) 282 4092

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AUDIT QUESTION MATRIX
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AUDIT AREA NUMBER

ALLEGATION
NUMBER

I

II

III

IV

V

VI

VII

0

1.0
2.0
3.0

1.0
2.0

1.0
7.0

1.0
2.0

1

9.0

7.0
8.0
9.0

2

10.0

29.0

22.0

3

8.0

9.0

4.0

1.0
2.0
3.0
4.0
5.0
6.0

4

11.0

23.0

10.0

5

6

11.0

7

7.0

1.0
2.0

8

9

10

3.0
4.0
5.0
6.0

3.0

12.0
13.0

11

23.0

12

3.0

14.0

Rec'd 8/2/84 @ BML @ 2PM
from Metcalve

AUDIT QUESTION MATRIX
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ALLEGATION NUMBER	I	II	III	IV	V	VI	VII
13							24.0
14							
15		7.0		4.0			15.0
16							
17				5.0 6.0			
18				7.0			
19		4.0 5.0		8.0	2.0 3.0		
20							
21		8.0		30.0			
22							
23							
24							
25							
26				10.0			
27				10.0			
28				10.0			
29							
30							16.0

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ALLEGATION NUMBER	I	II	III	IV	V	VI	VII
31							17.0 19.0 20.0
32							
33					4.0 5.0 6.0 8.0		
34				12.0 13.0 14.0			
35					9.0		
36				15.0 16.0			
37							
38							
39				17.0			
40						5.0	
41				18.0 19.0 20.0		6.0	
42				21.0			
43				22.0			
44					10.0		

ADDIT QUESTION MATRIX
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ALLEGATION NUMBER	I	AUDIT AREA NUMBER II	III	IV	V	VI	VII
45				24.0			
46							
47							
48				25.0			21.0
49				24.0 26.0			
50						7.0	
51				27.0 28.0		8.0	
52						7.0	
53					11.0		
54							
55							18.0
56							
57							
58							
59							
60					12.0		

Phil

Read 8/1/87 @ BM

Plan 1/2/2/2/2/2

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 01 - CONCERNING 01 11S/1201/11S OR 11/1201 DBA ALLOWED BY CCP-40 PARA 4.3.1.2, BUT NOT DBA TESTED PER IMPERIAL LETTER VBR-7697 DATED 8 MAY 78

--- ACTION ITEMS ---

1. EVALUATE AND CHECK AREA FIGURES FROM LICENSEE.
2. CONFIRM INCLUSION IN EXEMPTION LOG.
- 3.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 02 - CONCERNING 02 REPAIR SEQUENCING

EX: NCR C83-01752 6/23/83

--- ACTION ITEMS ---

1. EVALUATE TECHNICAL JUSTIFICATION BY LICENSEE.
2. REVIEW AND CHECK AREA FIGURES FROM LICENSEE.
3. VERIFY AREAS ARE ENTERED IN EXEMPTION LOG.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 03 - CONCERNING 03 305 OVER OTHER MFGR'S EPOXY DBA PERMITTED PER DCA 17, 142, REV. 2, BUT NOT DBA TESTED

--- ACTION ITEMS ---

1. REVIEW USE OF EXEMPTION LOG.
2. VERIFY WESTINGHOUSE COATINGS ARE IN LOG OR DBAED.
3. IF DBA'ED ETC-AUDIT COATING RECORDS & OTHER MANF

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 03 - CONCERNING 03A305 OVER OTHER MFGR'S EPOXY DBA PERMITTED PER DCA 17, 142, REV. 2, BUT NOT DBA TESTED

--- ACTION ITEMS ---

- 1.
- 2.
- 3.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 04 - CONCERNING 04 1201 OVER CZ-11 DBA PERMITTED BY DCA 12,374, REV. 1, BUT NOT DBA TESTED

--- ACTION ITEMS ---

1. VERIFY ACCURACY OF AREA FIGURE FROM LICENSEE.
- 2.
- 3.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 05 - CONCERNING 05 305 OVER AMERON D-6 DBA PERMITTED BY CCP-30A, REV. 2 PARA 1.3.1, BUT NOT DBA TESTED

--- ACTION ITEMS ---

1. CHECK THICKNESS TESTED VERSUS PROCEDURE.
- 2.
- 3.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 06 - CONCERNING 06 NUTECH IIS OVER FOREIGN OBJECTS DBA PERMITTED BY CCP-40 REV. 5 PARA 4.1.1.3 OVER NAILS, REBAR CHAIRS, WOOD, ETC., BUT NOT DBA TESTED

--- ACTION ITEMS ---

1. VERIFY ACCURACY OF AREA FIGURE FROM LICENSEE.
- 2.
- 3.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 07 - CONCERNING CONCRETE COATING REPAIR WON'T FIX CRACKS REPAIR METHOD PER NCR C83-01986 WILL NOT SUCCEED IN REMEDYING CAUSE OF CRACKS AND FLAKING IN COATING

--- ACTION ITEMS ---

1. PASS ON TO QA / ACTION TO FIX PROCEDURES PER IMPL
2. VERIFY LICENSEE'S RESPONSE
- 3.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 08 - CONCERNING ZINC OVER ZINC RESIDUE ADHESION CCP-30 REV. 11 PARA 4.1.3 ALLOWS THIS BUT ADHESION AND GALVANIC PROTECTION FAILURES WILL RESULT

--- ACTION ITEMS ---

- 1.
- 2.
- 3.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 09 - CONCERNING THREE COAT SYSTEM OF ZINC DBA Q1-QP-11.4.5 REV. 27 PARA 3.2.4 PERMITS ONLY 2 COATS, BUT 3 COATS HAVE BEEN APPLIED WITH NO DBA

--- ACTION ITEMS ---

- 1.
- 2.
- 3.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 10 - CONCERNING POWER TOOL SURF. PREP. DBA Q1-QP-11.4.5, REV. 27 PARA 3.2.2.3 ALLOWS MANY POWER TOOLS - NOT DBA TESTED & DOESN'T GIVE PROFILE

--- ACTION ITEMS ---

1. VERIFY NEW PROCEDURE REV. TO SPECIFY PROPER TOOLS
2. INVESTIGATE SIZE OF TOTAL AREA INVOLVED.
3. CHK SAMPLE PANELS-HOW CERTIFIED-RECORDS SHOW TOOLS

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 11 - CONCERNING PRIMER THICKNESS OF .5 MILS DBA PERMITTED BY DCA 18,489, REV. 1, BUT NOT DBA TESTED

--- ACTION ITEMS ---

1. VERIFY ACCURACY OF AREA FIGURE FROM LICENSEE.
- 2.
- 3.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 12 - CONCERNING 102 MIL THICK CONCRETE COATING DBA THIS THICKNESS PERMITTED BY CCP-40, REV. 5, PARA 4.3.1.2, BUT NOT DBA TESTED

--- ACTION ITEMS ---

1. VERIFY AREAS ARE PUT IN EXEMPTION LOG.
2. EVALUATE/ CHECK SIZE OF AREAS INVOLVED.
- 3.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 13 - CONCERNING REACTOR CORE CAVITY COATINGS WILL FAIL DUE TO GAMMA AND NEUTRON EXPOSURE, COATINGS WILL NOT SURVIVE LOCA AND DBA RESULTS ARE NOT ADEQUATE

--- ACTION ITEMS ---

1. VERIFY ACCURACY OF AREA FIGURE FROM LICENSEE.
- 2.
- 3.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 14 - CONCERNING ANYONE CAN CLOSE NCRS/CAN'T WRITE NCRS UNSAT IRS MUST BE WRITTEN AND TRACKING COULD BE LOST

--- ACTION ITEMS ---

1. REVIEW PROCEDURE REVISIONS.
2. EXAMINE UNSAT IR TRACKING SYSTEM. CHECK CLOSEOUT.
3. EXAMINE SAMPLE QUARTERLY TRENDING OF IRS.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 15 - CONCERNING CZ-11 OR 191 ON 305 WITHOUT SANDING DBA PERMITTED PER CCP-30, REV. 11, PARA 4.4.3.0 WITHOUT SANDING TO MOTTLED TRANSITION, BUT NO DBA TESTS

--- ACTION ITEMS ---

1. REVIEW PROCEDURES RE: OVERLAPS.
- 2.
- 3.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 16 - CONCERNING COATING DEFECTS DUE TO IMPROPER PRESSURE OI HAS WRITTEN VIOLATIONS - HAS IMPROPER PRESSURE CAUSED UNRECORDED HARDWARE DEFICIENCIES?

--- ACTION ITEMS ---

- 1.
- 2.
- 3.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 17 - CONCERNING INVALID "AIR ACCEPTABILITY TESTS" CIGARETTE FILTERS USED DURING TESTS WOULD INVALIDATE RESULTS AND ALLOW USE OF AIR WITH OIL AND WATER

--- ACTION ITEMS ---

1. REVIEW FINAL WALKDOWN PROCEDURE FOR CRITERIA.
2. REVIEW RECORDS OF WALKDOWN.
3. WHO DID IT & WHAT METHOD.

BNL/CPSSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 18 - CONCERNING INSPECTORS NOT ALLOWED TO ID DEFECTS
IDENTIFICATION OF VISUAL DEFECTS NOT PERMITTED DURING BACKFIT INSPECTIONS

--- ACTION ITEMS ---

- 1.
- 2.
- 3.

BNL/CPSSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 19 - CONCERNING BACKFIT INSPECTION INSTRUCTIONS VAGUE
QI-QP-11.4-23 AND QI-QP-11.4-24 ARE VAGUE REGARDING THE METHODS FOR PERFORMING BACKFIT INSPECTIONS

--- ACTION ITEMS ---

- 1.
- 2.
- 3.

BNL/CPSSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 20 - CONCERNING NOT CUTTING AROUND DOLLIES
CONTRARY TO ADHESION TESTER MANUFACTURER'S INSTRUCTIONS, CUTTING NOT PERFORMED PRIOR TO PULLING

--- ACTION ITEMS ---

- 1.
- 2.
- 3.

BNL/CPSSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 21 - CONCERNING NO CORRECTION CURVE FOR AD. TESTER CALS.
DEVIATION CHARTS WERE NEITHER FURNISHED NOR USED IN FIELD

--- ACTION ITEMS ---

- 1.
- 2.
- 3.

BNL/CPSSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 22 - CONCERNING NO ADHESION TESTER TRAINING
INSPECTORS REQUIRED TO TAKE READINGS WITHOUT FORMAL TRAINING IN TEST METHOD

--- ACTION ITEMS ---

1. AUDIT QUALIFICATION / I & T FILES.
2. INTERVIEW QC'S & REVIEW INSTRUCTORS QUALIFICATIONS
- 3.

BNL/CPSSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 23 - CONCERNING QC PROGRAM INFERIOR COMPARED TO OTHERS
FOR EXAMPLE ADHESION TAPE TEST NOT ALLOWED

--- ACTION ITEMS ---

1. STAN TO FOLLOW UP TO GET MORE SPECIFICS FR ALLEGER
- 2.
- 3.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 24 - CONCERNING COATINGS OVER UNPREPARED SURFACES
COATINGS APPLIED OVER RUST AND SCALE INSIDE OF OPEN TUBE STEEL PIPE SUPPORTS

--- ACTION ITEMS ---

1. INTERFACE WITH QA RE: IMPROPER USE OF DCA VS. NCR.
2. VERIFY ACCURACY OF AREA FIGURE FROM LICENSEE.
- 3.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 25 - CONCERNING ACCEPTANCE OF UNACCEPTABLE SEAL COAT
OUTSIDE SKIMMER PUMP ROOM IN UNIT 1 ON LINER PLATE SEAL COAT HAD STAINS BUT WAS ACCEPTED

--- ACTION ITEMS ---

1. REVIEW INSPEC REPORTS & VERIFY AREA WAS REWORKED.
- 2.
- 3.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 26 - CONCERNING DCAS NOT CONTROLLED

--- ACTION ITEMS ---

1. REVIEW DCA DISTRIBUTION RECORDS.
2. REVIEW DCA PROCEDURE.
- 3.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 27 - CONCERNING DCAS ORIGINATED AND APPROVED BY ENGR.
QA/QC HAS NO INPUT INTO THE REVIEW AND APPROVAL CYCLE

--- ACTION ITEMS ---

1. REVIEW DCAS TO FIND IF QA/QC REQ'TS WERE AFFECTED.
- 2.
- 3.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 28 - CONCERNING DCAS USED INSTEAD OF NCRS
APPROX 40% OF DCAS ARE USED TO ADDRESS ISSUES FOR WHICH NCRS SHOULD HAVE BEEN WRITTEN

--- ACTION ITEMS ---

1. REVIEW DCA PROCEDURES.
2. REVIEW ISSUED DCAS FOR SCOPE AND CONTENT.
3. LETS SEE (1983) CAT REPORT REFERRED TO IN RESPONSE

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 29 - CONCERNING DCAS WRITTEN TO OVERCOME PROBLEMS
I.E. DCAS WRITTEN TO FACILITATE SCHEDULE EVEN IF THIS MEANS NONCOMPLIANCE WITH PROCEDURES

--- ACTION ITEMS ---

- 1.
- 2.
- 3.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 30 - CONCERNING DCAS ISSUED TO DOWNGRADE AS-31 TO AS-30
EG: SP-10 CHANGED TO SP-6 SURF. PREP. DOWNGRADES SAFETY TO NON-SAFETY

--- ACTION ITEMS ---

1. VERIFY THESE AREAS ARE ON EXEMPTION LOG.
- 2.
- 3.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 31 - CONCERNING SP-6 INTERPRETED AS "BEST EFFORTS"
MANAGEMENT TOLD INSPECTORS " IF YOU CANNOT GET TO AN AREA, DO NOT WORRY ABOUT IT."

--- ACTION ITEMS ---

1. VERIFY ENTRY ON EXEMPTION LOG OR NOT COATED LOG.
- 2.
- 3.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 32 - CONCERNING READING LIST INFO CHANGED AFTER SIGNING

--- ACTION ITEMS ---

- 1.
- 2.
- 3.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 33 - CONCERNING LEAD INSPECTOR K - LACK OF EXPERIENCE
EG: K IDENTIFIED RUST AS D-6 - THIS INEXPERIENCE CAUSED MANY OF THE COATING PROBLEMS

--- ACTION ITEMS ---

1. AUDIT I&T RECORDS.
2. EVALUATE RATIOS OF I'S II'S AND III'S PAST & NOW.
3. DID QC LEVEL I'S SUPERVISE? CONTRARY N45.2.6

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 34 - CONCERNING N45.2.2 NOT MET FOR MATERIAL STORAGE

--- ACTION ITEMS ---

1. INTERVIEW PERSONNEL. REVIEW STORAGE RECORDS.
2. REVIEW PROCEDURE.
3. DETERMINE IF COMPLIANCE WITH N45.2.2 IS REQ'D.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 35 - CONCERNING WORKMANSHIP AND PAINTER I&T & QUALS.
POOR WORK QUALITY AND DOCUMENTATION REQ'TS NOT MET FOR PAINTER QUALIFICATIONS AND IN-PROCESS WORK

--- ACTION ITEMS ---

1. MORE COMPLETE AUDIT OF PAINTER QUAL FILES/1 TO CHK
- 2.
- 3.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 36 - CONCERNING MAT'L TRACEABILITY NOT ALWAYS MAINTAINED

--- ACTION ITEMS ---

1. REVIEW MATERIAL CERTIFICATIONS FROM START OF JOB.
2. REVIEW MATERIAL PURCHASES FROM START OF JOB.
3. AUDIT CURRENT USE OF COATING MATERIALS LOG.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 37 - CONCERNING BACKFIT RECORDS INCORRECT AND IMPROPER "SAT" PRIMER AREAS HAD 10 MILS, OK DOC. MAPS ARE WRONG, FORGERIES, ACCEPTANCE WITHOUT INSPECTION

--- ACTION ITEMS ---

1. AUDIT MAPS OF BACKFIT PROGRAM.
2. REVIEW STATISTICAL ANALYSIS AND IMPACT.
- 3.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 38 - CONCERNING HIGH DFT CZ-11 GROUND TO ACCEPTABLE DFT THIS WOULD POLISH ZINC AND CAUSE POOR TOPCOAT ADHESION

--- ACTION ITEMS ---

- 1.
- 2.
- 3.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 39 - CONCERNING TOPCOATING OLD 305 - SURFACE PREPARATION PHENOLINE 305 (1 AND 2 YEARS OLD) BEING TOPCOATED WITH 305 AFTER SOLVENT WIPE ONLY

--- ACTION ITEMS ---

1. VERIFY THIS PRACTICE PROCEDURALLY ADDRESSED?
2. WHAT SOLVENT WILL BE USED?
- 3.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 40 - CONCERNING CLEANING POWER TOOLED SURFACES BRUSHING OR VACUUMING NOT PERFORMED - INSTEAD BLOW DOWN WITH (MAYBE DIRTY) AIR AND RAG WIPE (LINT)

--- ACTION ITEMS ---

1. INTERVIEW PEOPLE TO VERIFY METHOD ACTUALLY USED.
- 2.
- 3.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 41 - CONCERNING SOLVENT WIPING WITH FOREIGN CLEANER HOSPITAL DISINFECTANT WITH 2% CHLORIDES USED TO WIPE PAINTED SURFACES PRIOR TO REPAIRS

--- ACTION ITEMS ---

1. INTERVIEW PERSONNEL TO DETERMINE EXTENT OF USE.
2. INTERFACE WITH OTHER GROUPS REGARDING STAINLESS.
3. REVIEW NCR SC-87-01694

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 42 - CONCERNING RICHMOND INSERTS - FOAM AND DUCT TAPE
FOAM AND DUCT TAPE ON RICHMOND INSERTS WAS OVERCOATED WITH 11S AND 1201 AND REMAINS BENEATH COATINGS

--- ACTION ITEMS ---

- 1.
- 2.
- 3.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 43 - CONCERNING CZ-11 NOT CURED PRIOR TO TOPCOATING
PROCEDURES NOT FOLLOWED TO DETERMINE IF CZ-11 WAS PROPERLY CURED

--- ACTION ITEMS ---

1. REVIEW RESPONSE AND EVALUATE IMPACT ON HARDWARE.
2. IS CURE CHECK RECORDED ON IRS?
3. WERE AMBIENT CONDITIONS RECORDED DURING CURE?

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 44 - CONCERNING "NICKLE TEST" NOT PERFORMED PROPERLY

--- ACTION ITEMS ---

1. REVIEW RESPONSE / IN REGARDS TO C. RUSHINGS INSTRU
- 2.
- 3.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 45 - CONCERNING NO REINSPECTION OF DEFECT REPAIRS
PRODUCTION JOB TYPE FINAL INSPECTION NOT PERFORMED FOR REPAIR AREAS / REPAIRS NEVER REINSPECTED

--- ACTION ITEMS ---

- 1.
- 2.
- 3.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 46 - CONCERNING RUST AND FILTH OBSERVED DURING TOOKES
CONTAMINATES ON SUBSTRATE BENEATH PAINT WERE OBSERVED DURING THE PERFORMANCE OF TOOKE GAUGE TESTS

--- ACTION ITEMS ---

1. TAKE TOOKE IN AREAS DESCRIBED BY ALLEGER?
2. INTERVIEW OTHERS TO CONFIRM.
- 3.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 47 - CONCERNING 25 ELCOMETER ADHESION TESTS ON HANGER
INSPECTORS WERE INSTRUCTED TO PERFORM 25 TESTS - CONTRARY TO PROCEDURES

--- ACTION ITEMS ---

1. VERIFY LICENSEE'S RESPONSE BY REVIEWING RECORDS.
2. GET MORE DETAIL FROM ALLEGER RE: SPECIFIC EXAMPLES
- 3.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 48 - CONCERNING COATINGS APPLIED OVER SEISMIC JOINTS
COATINGS WERE APPLIED OVER SEISMIC JOINTS WHICH WERE FILLED WITH FOAM AND WERE NOT TO BE COATED

--- ACTION ITEMS ---

1. INVESTIGATE IF THIS WAS CONTRARY TO PROCEDURE.
2. REVIEW PROCEDURES ON THIS SUBJECT.
3. VERIFY INCLUSION IN EXEMPTION LOG SQ FT FIGURES.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 49 - CONCERNING OVERSPRAY ALLOWED AND COMMONPLACE
OVERSPRAY WAS ALLOWED INTO AREAS THAT HAD PREVIOUSLY BEEN INSPECTED AND ACCEPTED - THIS IS COMMON

--- ACTION ITEMS ---

1. CONFIRM LICENSEE'S RESPONSE VIA INTERVIEWS.
2. REVIEW IRS RE: OVERSPRAY IDENTIFICATION/REMOVAL.
- 3.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 50 - CONCERNING COATINGS APPLIED WITHOUT QC INSPECTION

--- ACTION ITEMS ---

1. REVIEW NCRS AND IRS REFERRED TO IN RESPONSE.
2. INTERFACE WITH OI TO PURSUE TECHNICAL DETAILS.
- 3.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 51 - CONCERNING PHENOLINE 305 50/50 MIX WITH THINNER
THIS THINNING SYSTEM CAUSED THE COATING TO BECOME BRITTLE AND LOSE IMPACT AND ABRASION RESISTANCE

--- ACTION ITEMS ---

- 1.
- 2.
- 3.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 52 - CONCERNING COATINGS ON CONCRETE WITH NO SURF. PREP.

--- ACTION ITEMS ---

1. REVIEW NCRS AND IRS REFERRED TO IN RESPONSE.
2. RANDOM AUDIT CONC-CURF-PREP RECORDS (SINCE 1981)
3. INTERVIEWS TO CONFIRM.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 53 - CONCERNING QC INSPECTORS NOT TO WRITE RFICS
QC INSPECTORS WERE NOT TO WRITE REQUESTS FOR INFORMATION OR CLARIFICATION

--- ACTION ITEMS ---

1. REVIEW TRAINING RECORDS/USE OF JOBSITE FORMS RFIC?
2. INTERVIEWS TO CONFIRM RESPONSE.
- 3.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 54 - CONCERNING DURING BACKFIT ONLY 1ST UNSAT RECORDED ONLY THE FIRST UNSATISFACTORY READING WAS RECORDED EVEN THOUGH OTHERS WERE HIGHER OR LOWER

--- ACTION ITEMS ---

1. REVIEW BACKFIT REPORTS TO CONFIRM RESPONSE.
- 2.
- 3.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 55 - CONCERNING REPAIRS NOT PERFORMED FOR BACKFIT UNSATS AREAS IDENTIFIED BY BACKFIT PROGRAM AS OUT OF RANGE, WERE NOT REMOVED AS REQUIRED

--- ACTION ITEMS ---

1. REVIEW PROCEDURES FOR PERFORMING/RECORDING INSPEC
- 2.
- 3.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 56 - CONCERNING ORIGINAL BACKFIT DOCUMENTS DESTROYED ORIGINAL DOCUMENTATION RELATED TO THE BACKFIT PROGRAM WAS DESTROYED BY QC MANAGEMENT

--- ACTION ITEMS ---

1. INTERFACE WITH OI FOR TECHNICAL MATTERS.
- 2.
- 3.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 57 - CONCERNING UNIT 2, EL 860 COATING OVER FILTH IN ROOM DIRECTLY OFF ELEVATOR COATINGS WERE APPLIED OVER VARIOUS UNSUITABLE FOREIGN MATTER

--- ACTION ITEMS ---

1. INDEPENDENTLY CHECK AREA & RECORDS IN BOTH UNITS.
- 2.
- 3.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 58 - CONCERNING QC INSPECTIONS WITH INADEQUATE LIGHT PER QI-P-11.4-1 DEFINES ADEQUATE LIGHTING AS THE MINIMUM FROM A 2 CELL FLASHLIGHT

--- ACTION ITEMS ---

1. INTERFACE WITH OI ON TECHNICAL MATTERS.
- 2.
- 3.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 59 - CONCERNING ACCEPTANCE OF SUBSTANDARD COATINGS ON LINER PLATE ABOVE & BELOW POLAR CRANE RAIL A7 270 TO 0

--- ACTION ITEMS ---

1. REVIEW ORIGINAL RECORDS FOR THE AREA IN QUESTION.
- 2.
- 3.

BNL/CPSES TRT ALLEGATION DATA FILE (L2) - ALLEGATION NUMBER 60 - CONCERNING SELECTIVE ASSIGNMENT OF QC INSPECTORS
SELECTIVE ASSIGNMENTS WERE USED TO ASSURE THAT COATINGS WOULD PASS INSPECTION - ALSO ONLY 1 QC SIGNS
--- ACTION ITEMS ---

- 1.
- 2.
- 3.