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June 6, 1986

MEMORANDUM FOR: Robert D. Martin, Regional Administrator  
Region IV

FROM: James M. Taylor, Director  
Office of Inspection and Enforcement

SUBJECT: ASSESSMENT OF REGION IV PERFORMANCE

Enclosed is the integrated assessment of the Region IV implementation of IE programs. This report assesses ten selected areas within the IE programs for the 1985-1986 Assessment Year: July 1985 to June 1986. During the course of the year, my staff provided yours with an interim report addressing formal programmatic assessment results and an evaluation of interactions on routine and special projects.

I would be happy to discuss the particulars of these assessments with you. I also encourage your division directors to discuss any questions they have with the appropriate IE division director.

[Original Signed by J. M. Taylor]

James M. Taylor, Director  
Office of Inspection and Enforcement

Enclosure: as stated

cc: V. Stello  
J. Sniezek

CONTACT: Barry Zalcmn, IE  
x2-4905

8803080369 880304  
PDR FOIA  
CONNOR87-847 PDR

OFFICE OF INSPECTION AND ENFORCEMENT  
REPORT OF REGIONAL ASSESSMENT  
OF  
IE PROGRAMS

ASSESSMENT YEAR JULY 1985 - JUNE 1986  
REGION IV

[Original Signed by J. G. Partlow]  
James G. Partlow, Director  
Division of Inspection Programs

[Original Signed by E. L. Jordan]  
Edward L. Jordan, Director  
Division of Emergency Preparedness  
and Engineering Response

[Original Signed by B. K. Grimes]  
Brian K. Grimes, Director  
Division of Quality Assurance, Vendor  
and Technical Training Center Programs

[Original Signed by J. Axelrad]  
Jane Axelrad, Director  
Enforcement Staff

[Original Signed by J. L. Blaha]  
James L. Blaha, Director  
Program Support and Analysis Staff

## Regional Assessment Report

### Region IV

#### Introduction

Assessments of regional implementation of IE programs were conducted in accordance with IE Office Procedure 0200. Assessment criteria and/or guidance for the selected segments of the program areas were provided to the regions and used as the basis for the assessments. During the course of the planning process, an effort to integrate the assessment for IE programs was undertaken.

For those situations where a particular activity was assessed, the region was given the opportunity to respond to the assessment findings during and following each assessment visit. Those individual assessment reports were transmitted to the regions under separate cover. An interim assessment report was compiled to provide feedback to the regions and encouraged establishing the necessary dialog to ensure that an acceptable level of implementation could be achieved.

A table summarizing the rating of each of 10 program areas assessed by IE follows. The rating scheme used in this report is the same as that for appraisals:

- O - Outstanding
- E - Excellent
- FS - Fully Successful
- MS - Minimally Satisfactory
- U - Unsatisfactory

These are to be taken as the overall region's performance of the selected IE programs.

Note: As project in spectator  
I considered these  
program areas unsat.

Summary of Ratings of IE Programs

Region IV

<u>Program Areas</u>	<u>Rating</u>	Comanche Peak (my rating) HSP
1) Operating Reactors	FS	
2) Reactors Under Construction	FS	↔ u
3) Fuel Facilities and Materials	E	
4) Events Reporting	(FS) E	↔ u
5) TMI Action Tracking	FS	
6) Incident Response	E	
7) Emergency Preparedness	E	
8) Enforcement	MS	↔ u
9) Technical Training	FS	
10) Resource Utilization	MS	↔ u



REACTORS CONSTRUCTION INSPECTION

RATING: FS

The reactor construction inspection program for Region IV was assessed based on the CAT inspection performed at the South Texas facility during October-November 1985. The results of this assessment were discussed in the J. G. Partlow memorandum to Region IV dated May 2, 1986. The summary includes:

- The completion status of the inspection program does not correspond to the reported stage of construction.
- The CAT findings do not support the improved performance SALP ratings in the areas for Corrective Action and Reporting and the Design and Design Change Control. The remaining areas were in general agreement.
- There was evidence that the Region was aware of some delays in the implementation of the inspection program and was working to correct these deficiencies.

Overall Region IV is rated Fully Successful in this program area.

The implementation of the construction inspection program at South Texas is generally adequate. The CAT inspection findings were generally in agreement with and supportive of the regional inspection findings in most construction areas. It is recognized that the CAT inspection sample in various areas was large relative to the normal region samples, and that the CAT might identify findings that were not covered by the smaller region samples. However, the CAT did identify a number of different concerns in the area of civil and structural construction, where the region's inspection program is essentially complete. The CAT also identified some weaknesses in the mechanical construction area which the region did not identify during their inspection of the construction in this area.

The regional inspections that have been performed appear to have been thorough and their reporting has been detailed and concise. The inspection emphasis on hardware is consistent with the current program policy. However, the completion status of the program does not correspond to the reported stage of completion of construction for the site. This apparently is partly due to the previous assignment of inspection resources to other regional NTOL priorities and the region's schedule for program completion based on the view that the licensee's estimate for completion of site construction is optimistic. The region's current reevaluation of the status of program completion and rescheduling of inspection requirements should assure the completion of the remaining elements of the construction inspection program.

The CAT findings also support the most recent SALP evaluation in the areas of Piping Systems and Supports, Electrical Power Supply and Distribution, and Licensing Activities. However, they do not support the improved performance indicated for Corrective Action and Reporting and for Design and Design Change Control.

OK

not warranted.

ENFORCEMENT PROGRAM

RATING: MS

The enforcement packages submitted by Region IV have declined noticeably in recent months, with extensive rework required on many cases. Enforcement actions at Severity Levels IV and V from inspection reports in the security/safeguards area lacked sufficient detail and several examples were found of failure to cite violations (e.g., Inspection Report 50-458/85-67.) Inspection Reports in the reactor operations area generally conformed to the enforcement policy, guidance and precedents. The Region has submitted a number of cases recently, particularly in the safeguards area, that were substantially in excess of the six-week timeliness goal (e.g., EA 86-82, Fort St. Vrain - 31 weeks; 86-44, Cooper - 30 weeks; 86-82, ANO - 26 weeks; 86-81, Fort St. Vrain - 24 weeks; and 86-84, Wolf Creek - 22 weeks). These delays have seriously affected the Region's timeliness performance since the Interim Assessment. The overall rating for Region IV in this area is Minimally Satisfactory.

The performance of Region IV in submitting escalated enforcement packages has slipped considerably in both timeliness and quality during the assessment period. Many of the cases required significant rework. For example, EA 86-3, Cooper; EA 86-44, Cooper; EA 86-74, River Bend and EA 86-50, Waterford required significant changes. Notices of Violation frequently had to be rewritten to create supportable citations and remove extraneous material. As discussed during the Management Meeting in November, 1985, we strongly recommend additional involvement by the Regional counsel to improve the quality of the packages. Supporting documentation frequently did not accompany the packages and was not forthcoming after several requests. EA 86-55, Comanche Peak, was submitted as a Severity Level IV, although it fit an explicit example in the policy for a Severity Level III. No explanation was provided for the categorization nor had an inspection report been written or an enforcement conference been held. Efforts to expedite enforcement packages which were already submitted late by the Region to Headquarters have been hampered by the Region's refusal to approve minor changes by telephone. Further, in the area of enforcement for willful violations, even after having a problem in a case and receiving an EGM on the subject, the Region issued as a Severity Level IV violation a case that was willful on its face and had been referred to OI. In another instance, the Region was directed by IE management to transcribe minutes of an enforcement meeting and, without informing IE management, decided not to transcribe it. Despite repeated efforts by the Enforcement Staff to obtain minutes of the meeting, they were not provided until four months later. These instances indicate that additional attention needs to be devoted to the enforcement program in Region IV.

Inspection Reports

A review of 10 inspection reports selected at random from reports issued by Region IV during the period November 30, 1985 - May 15, 1986 was conducted in the reactor operations area. This review of enforcement actions issued at Severity Level IV and/or V indicated that most of the findings were usually supported by the facts detailed in the inspection reports. In Inspection Report 50-382/85-31, the licensee was cited for the failure to adequately evaluate and report a defect in accordance with 10 CFR Part 21. However, the report details explain that the licensee evaluated this failure under

CFR Part 21 and determined the defect was not reportable. The details as to why the licensee's evaluation was inadequate are not provided, except to indicate that this defect could create a substantial hazard. If the licensee failed to report a legitimate defect, the violation should have been characterized as a Severity Level III. Inspection Report 50-458/85-77 cites a failure of the design control program at River Bend in that a Field Change Notice was misleading and difficult to follow. This same Field Change Notice was cited in Inspection Report 50-458/85-69 because of its use contrary to site procedural requirements. Two Severity Level IV violations for the same deficient change notice are not appropriate, particularly when the second violation was cited during the period of the licensee's response.

A review of enforcement actions (5 inspection reports) issued by Region IV during the period July 1 - December 31, 1985 in the security/safeguards area was conducted. This review of enforcement actions issued at Severity Level IV and/or V indicated that some cited violations may be under-classified and that some apparent violations were not cited. The lack of detailed information in the inspection reports made it difficult to determine with certainty whether this was the case. Specifically, Inspection Report 50-267/85-24 involved an unlocked, unalarmed and uncontrolled door to a vital area. Although the circumstances fit a Severity Level III example in the policy, this violation was categorized at Severity Level IV. The inspection report did not provide details to explain why this violation should not be considered a Severity Level III. Another example, Inspection Report 50-458/85-67, involved the discovery of a contractor employee (who was badged for escorted access) without an escort. That same inspection report cited another Severity Level IV violation which involved failure to control key card badges. However, the inspection report contained little more detail than the Notice of Violation. Therefore, it could not be determined whether the key card violation was appropriately categorized.

Several examples of apparent failures to cite a violation were observed. Inspection Report 50-458/85-67 (previously discussed) cited a Severity Level IV reporting violation concerning an unsecured vital area door. However, the enforcement action did not cite for the unsecured door.

### Timeliness

The Commission has established a goal of issuance of escalated actions within an average of eight weeks from identification of a violation. To meet this goal, packages must be submitted by the Regions for IE concurrence within six weeks of identification of a violation. The average time for submittal of escalated enforcement actions to IE for concurrence was 12.56 weeks which does not come close to meeting the goal of six weeks. Delays have been increasing, particularly in safeguards cases, and they have more than doubled since the mid-year review. With regard to the safeguards cases, the Region was told that they should not delay the earlier cases, particularly since precedents were available in other Regions which Region IV could have followed to resolve the cases. The Region persisted in its approach and the timeliness statistics reflect this decision.



*Bud*  
In Reply Refer To:  
Dockets: 50-445/83-49  
50-446/83-23

JUN 22 1984

26.

Texas Utilities Electric Company  
ATTN: M. D. Spence, President, TUGCO  
Skyway Tower  
400 North Olive Street  
Lock Box 81  
Dallas, Texas 75201

Gentlemen:

This refers to the Systematic Assessment of Licensee Performance (SALP) Board Report of the Comanche Peak Steam Electric Station, Units 1 and 2. The SALP Board met on January 4, 1984, to evaluate the performance of the subject facility for the period October 1, 1982, through October 31, 1983. The performance analyses and the resulting evaluation are documented in the enclosed SALP Board Report. These analyses and evaluations were discussed with you at the Comanche Peak site on May 25, 1984. I should like to emphasize that this report covers an appraisal of your performance for a limited period of time and may not be indicative of current conditions.

It is my view that the Texas Utilities Electric Company's overall regulatory performance at the Comanche Peak facility is satisfactory for the period in question. As the attached report indicates, your performance in five functional areas received the highest performance category rating of 1. In addition, I note that in three functional areas your performance went from Category 1 to Category 2. Although the ratings are still satisfactory, I am concerned because the changes are in the wrong direction. I hope that these changes will cause you to seek out the root cause and implement programs to assure that this trend does not persist.

One functional area received a rating in performance Category 3. This area includes plant support systems such as HVAC, radwaste, fire protection and fuel storage, and the Category 3 rating indicates a need for additional management attention and oversight on your part.

Your letter, dated May 29, 1984, in response to the SALP Board findings, and the SALP Board report with two errata, appear as enclosures to this letter, which issues the SALP Board Report as an NRC report.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, your letter of May 29, 1984, our letters of May 30 and May 22, 1984, a copy of the 1983 SALP Report, and a copy of this letter will be placed in the NRC's Public Document Room.

B/2  
UMHunnicut  
6/21/84

RPB2  
EHJohnson  
6/1/84

DRSS  
RPDenise  
6/21/84

DRA  
PCheck  
6/21/84

RA-BIV  
JTCollins  
6/21/84

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## 2. Preoperational Progress

The startup testing is approximately 67% field complete, and the preoperational test procedures have essentially been written, reviewed, and approved. The writing and approval of initial startup procedures continues.

A significant reduction in testing activities occurred after hot functional testing (HFT). At this time, the testing activities have not reached their previous level. The reduction was the result of a large amount of rework initiated by the licensee after HFT. Testing activities are not expected to attain their previous level before the end of 1983.

## C. Inspection Activities

### 1. Construction Appraisal Team Inspection

During this appraisal period, an inspection by the Construction Appraisal Team (CAT) was performed at CPSES on January 24-February 4, 1983, and February 14-March 3, 1983, (NRC Inspection Reports 50-445/83-18 and 50-446/83-12). The areas inspected and results are listed below:

- a. Electrical and Instrumentation Construction  
Three potential enforcement findings
- b. Mechanical Construction  
Three potential enforcement findings
- c. Welding/Nondestructive Examination  
One potential enforcement findings
- d. Civil and Structural Construction  
One potential enforcement findings
- e. Procurement, Storage, and Material Traceability  
One potential enforcement finding
- f. Quality Control Inspector Effectiveness  
Two potential enforcement findings
- g. Quality Assurance  
Three potential enforcement findings
- h. Design Change Controls and Corrective Action System  
Two potential enforcement findings

- Failure to implement an effective QA program for the installation of the HVAC system in that supports had significant quantities of undersized welds; duct system joints had numbers of instances of loose and missing bolting; gaskets were missing or incomplete at duct joints. (Severity IV - 8318)
- Failure to implement a QA program in regard to the fabrication of support posts for underwater lights installed in the refueling pools and fuel storage pools. (Severity V - 8303)

In addition, the licensee reported two deficiencies in accordance with 10 CFR 50.55(e). These were as follows:

- By letter dated May 31, 1983, the licensee informed the NRC that it had been discovered that the anchoring of the new fuel storage racks had been improperly implemented. A new design was developed and installed and was examined by the SRIC prior to use of the storage racks.
- By letter dated September 26, 1983, the licensee reported that during startup testing it was found that temperatures in excess of established parameters were experienced in the reactor vessel annulus. The licensee reported that it is planned to increase the cooling capacity for the area and to remove air flow restrictions in the area.

In response to the first violation above, the licensee inspected HVAC support welds to determine the worst case condition. The HVAC designer has in turn determined that under worst case loading, the load on the worst case weld is still well within the allowable strength limits. As noted below, NRC review of this analysis is required. The assorted problems with the duct joints were attributed to lack of proper interface between the startup organization and the contractor for HVAC installation.

## 2. Conclusion

The licensee's performance in the functional area must be considered to be in Category 3 since their audit programs failed to identify the HVAC problem discussed above.

The NRC inspections in this area revealed two deficiencies as follows:

- Failure to follow procedures for design review in that mathematical calculation packages contained errors that were not identified in the check review. (Severity V 8230)
- Failure to remove obsolete and illegible drawings from construction work areas. (Severity IV 8318)

## 2. Conclusion

While the licensee has made significant improvements in his design and design change control programs, these improvements only began to be effective in the latter portion of the review period. Taken as whole for the review period, the licensee performance is considered to be in Category 2.

## 3. Board Recommendations

### a. Recommended NRC Actions

The NRC should continue to evaluate this functional area through the "as-built" (room turnover) inspections to assure that the licensee meets his commitments.

### b. Recommended Licensee Actions

The licensee should assure that the design drawing package program continues to be practiced without compromise. The licensee should also continue his efforts to update the parent design drawings to reflect field changes CMCs.

## N. Quality Assurance - Preoperational Testing

### 1. Analysis

The licensee has established a separate quality assurance plan for the preoperational testing phase. The preoperational testing phase quality assurance requirements and controls are described in the CPSES Startup Quality Assurance Plan. There were no specific inspections of the licensee's startup quality assurance program during this reporting period. However, quality assurance aspects are considered during the inspection of the various preoperational testing activities.

*Doubt  
this  
finding*

*also  
bad  
area* →



There were no violations issued in this functional area during this reporting period. However, it is felt that had a final quality assurance review of records transfer been required, the violation associated with the startup records would not have occurred.

## 2. Conclusions

There is evidence of management attention in this area. Audits and reviews by the Quality Assurance department of preoperational test activities are adequate. It was concluded that satisfactory performance is being achieved in the preoperational quality assurance area.

The licensee is considered to be in performance Category 2 in this area.

## 3. Board Recommendations

### a. Recommended NRC Actions

NRC inspection will continue at the present level in the preoperational testing area. Specific attention will be given to final records retention and transfer since the function is expected to increase as testing nears completion.

### b. Recommended Licensee Actions

The overall implementation of the preoperational quality assurance effort is considered adequate and should be continued at the present level. However, a more vigorous involvement, in the form of an independent review, of the final preoperational test data packages to ensure that all required documents to support test acceptance are retained for permanent storage should be undertaken.

## 0. Quality Assurance - Construction

### 1. Analysis

The NRC did not conduct specific inspections dedicated to quality assurance. All of the NRC inspections, however, examining various facets of the licensee's QA program as it affects the above functional areas relating to construction. These inspections included examination of such items as the qualifications of the QC personnel, the control of nonconformances, the distribution of documents, etc. The NRC findings in each of the preceding functional areas also are indicative of the performance in this area. The licensee has had

NO

QA

in question

### 3. Board Recommendations

#### a. Recommended NRC Actions

The NRC should continue to monitor the licensee's activities in this area at a normal level. Consideration should be given to the fact that most of the efforts in this area will be directed toward replacement or spare parts for already purchased components.

#### b. Recommended Licensee Actions

The licensee should continue his efforts to train and upgrade the personnel in the vendor procurement control section of the QA department. The licensee should also devote effort to identify those quality elements of various products that are most likely to be over looked by the vendor.

### Q. Management Controls and Involvement

#### 1. Analysis

The licensee has placed TUEC employees in the key areas of site operations, including engineering, construction, and QA. As an example, the supervisors of each of the onsite discipline engineering groups are licensee employees who are also degreed engineers.

The licensee has also placed onsite a corporate officer to manage the site activities. This officer is the vice president and general manager for the project. This officer has an assistant who is also the project engineering and construction manager as well as the manager of startup testing activities. All of the persons in various supervisory positions report to the assistant project manager except for the site QA supervisor who reports to the QA manager in the corporate offices.

The project general manager and his assistant provide a weekly briefing to the corporate officers. These officers have been observed to frequently visit the site to view the status of construction and to assist in the resolution of major problems.

#### 2. Conclusion

The licensee's level of involvement and the degree of control over the site activities is considered to be in performance Category 2.

Doubt  
(this  
finding)

JAN 31 1983

Dockets: 50-445/82-24  
50-446/82-12

Texas Utilities Generating Company  
ATTN: R. J. Gary, Executive Vice  
President & General Manager  
2001 Bryan Tower  
Dallas, Texas 75201

Gentlemen:

This refers to the Systematic Assessment of Licensee Performance (SALP) Board Report of Comanche Peak Steam Electric Station, Units 1 and 2. The SALP Board met on November 9, 1982, to evaluate the performance of the subject facility for the period October 1, 1981, through September 30, 1982. The performance analyses and resulting evaluation are provided in the enclosed SALP Board Report. These analyses and evaluation were discussed with you onsite on December 3, 1982.

For NRC scheduling purposes, there are 3 months not included in either this report or the 1981 report. The NRC staff has reviewed the data for the period and has noted nothing that would change the conclusions of this review.

The SALP Board evaluation process consists of categorizing performance in each functional area. The categories which we have used to evaluate the performance of your facility are defined in Section II of the enclosed SALP Board Report. As you are aware, the NRC has changed the policy for the conduct of the SALP program based on our experiences and the recently implemented reorganization which emphasizes the regionalization of the NRC staff. This report is consistent with the revised policy.

We have reviewed your letter of December 27, 1982. We would recommend continuing discussion between site management personnel and our Senior Resident Reactor Inspector for Operations in the areas of nuclear experience and scheduling of tests. We will continue to follow your efforts in the area of improving inspections of vendor supplied welds.

The December 8, 1982, meeting was productive and gave us a better insight into your operations. It also gave us the opportunity to give you the perspective of how we viewed the conduct of your operations from the regulatory viewpoint.

RPS-A RJK  
TWesterman/dsm  
1/24/83

RPB1  
GMadsen  
1/24/83

DRRP&EP  
JGagliardo  
1/27/83

RA/RIV  
JC Collins  
1/27/83

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Appendix

U. S. Nuclear Regulatory Commission  
Region IV

Systematic Assessment of Licensee Performance

Report: 50-445/82- 24, 50-446/82-12

Dockets: 50-445; 50-446

Licensee: Texas Utilities Generating Company  
2001 Bryan Tower  
Dallas, TX 75201

Facility Name: Comanche Peak Steam Electric Station, Units 1 and 2

Appraisal Period: October 1, 1981 - September 30, 1982

Appraisal Completion Date: November 9, 1982

Licensee Meeting: December 8, 1982

SALP Board: G. L. Madsen, Chief, Reactor Project Branch 1  
S. B. Burwell, Licensing Project Manager, NRR  
T. F. Westerman, Chief, Reactor Project Section A  
D. L. Kelley, Senior Resident Inspector-Operations  
R. G. Taylor, Senior Resident Inspector-Construction

Reviewed:

T. F. Westerman  
T. F. Westerman, Chief  
Reactor Project Section A

11/24/82  
Date

Approved:

G. L. Madsen *for*  
G. L. Madsen, Chief  
Reactor Project Branch 1  
SALP Board Chairman

11/24/82  
Date

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In addition, SALP Board members considered other criteria, as appropriate. Based upon the SALP Board assessment, each functional area evaluated is classified in one of three categories. The definition of the performance categories are:

Category 1: Reduced NRC attention may be appropriate. Licensee management attention and involvement are aggressive and oriented toward nuclear safety; licensee resources are ample and effectively used such that a high level of performance with respect to operational safety or construction is being achieved.

Category 2: NRC attention should be maintained at normal levels. Licensee management attention and involvement are evident and are concerned with nuclear safety; licensee resources are adequate and are reasonably effective such that satisfactory performance with respect to operational safety or construction is achieved.

Category 3: Both NRC and licensee attention should be increased. Licensee management attention or involvement is acceptable and considers nuclear safety, but weaknesses are evident; licensee resources appear to be strained or not effectively used such that minimally satisfactory performance with respect to operational safety or construction is being achieved.

### III. Summary of Results

The licensee's performance in each functional area, as applicable, was determined by the SALP Board and are as tabulated below:

	<u>Functional Area</u>	<u>Performance Category</u>	
		<u>1981</u>	<u>1982</u>
A.	Plant Operations - Preoperational Testing	N/E	3
B.	Construction Activities		
	1. Soils and Foundation	N/E	N/E
	2. Containment and Other Safety-Related Structures	N/E	2
	3. Piping Systems and Supports (includes welding, NDE, and preservice inspection)	1	2
	4. Safety Related Components (includes vessel, internals, pumps, etc.)	1	1
	5. Support Systems (includes HVAC, radwaste, fire protection)	2	N/E
	6. Electrical Power Supply and Distribution	1	1
	7. Instrument and Control Systems	1	1
	8. Vendor Procurement Cycle Controls	N/E	3
	9. Licensing Activities	2	1

Note: The notation N/E indicates that the functional area was not evaluated for the reason indicated in Part IV of this report.



b. Conclusions

The licensee's controls of both the installation and quality control efforts in this area are well defined and have been demonstrated to be effective and the licensee's performance is, therefore, considered to be in Category 1.

c. Board Recommendations

The Board recommends that NRC inspection resources be redirected to this critical area when more active work is undertaken in Unit 2.

7. Instrument and Controls

a. Analysis

The Senior Resident Inspector-Construction accomplished two extensive inspections of this functional area during the period. These inspections concentrated on the physical installation of instrument devices and the connecting impulse tubing runs as distinguished from the electrical cabling connections since the latter is considered to be within the previous functional category.

No violations or deviations were identified in this area during the period.

b. Conclusion

The licensee's procedural controls for the installation and quality control of this area are clear and well defined and place the licensee in Category 1 from a performance standpoint.

c. Board Recommendations

The Board would note that the very important area of calibration of instrument systems has been and will be performed by the licensee directly through the plant operations group rather than by the construction forces. The effectiveness of this arrangement should be evaluated by the NRC.

8. Vendor Procurement Cycle Controls

a. Analysis

There have been two distinct inspections of this functional area conducted onsite during the review period. In addition, the Region IV Vendor Program Branch has conducted inspections at vendors on either a generic basis or on a site-specific basis

that provide indications of the effectiveness of the licensee's program. One violation was detected within the scope of this area as follows:

- Inadequate Control of Procurement Document and Purchased Materials (Severity IV-8203)

In addition, there have been two other instances involving substantial questions relative to this functional area that did not result in violations but have consumed considerable NRC resources. These are the problems associated with pipe whip restraints (fabricated by Chicago Bridge and Iron Company and by NPS Industries) and the main control boards (fabricated by Reliance Electric Company). In both cases, structural welding was found to be deficient to an extent that the structural integrity of the components was in question. In each case, the licensee source inspection organization had documented acceptable welds which, in turn, were not reinspected at the site by reason of source inspection acceptance.

b. Conclusion

The licensee is considered to be in performance Category 3 in this functional area since it appears that not enough of his resources have been assigned to this area or those resources that were directed were not fully trained and indoctrinated.

c. Board Recommendations

The licensee has committed to an extensive reinspection program involving vendor-supplied welded components to determine if yet other undetected problems are existant. The NRC should follow this reinspection effort closely to its conclusion.

9. Licensing Activities

The NRC Office of Nuclear Reactor Regulation has provided the Board with an evaluation (1) of this area which indicates that the licensee is very involved at a management level to assure the safe and reliable operation of Comanche Peak. The licensee is deemed to be knowledgeable as demonstrated by appearances before the ACRS and ASLB and by or through discussions with NRR personnel. The licensee has been diligent in resolving outstanding technical issues and has been responsive to NRC requests. The only exception to an otherwise high performance level has been in the area of plant staffing for operations where the personnel may not have enough "hands on" operating experience at the time of fuel loading. Commitments for corrective actions on this matter have been made by the licensee. The licensee was given an overall rating of Category 1.

(1) See Attachment A



In Reply Refer To:  
Dockets: 50-445/81-20  
50-446/81-20

4/1/82

Texas Utilities Generating Company  
ATTN: R. J. Gary, Executive Vice  
President and General Manager  
2001 Bryan Tower  
Dallas, Texas 75201

Gentlemen:

This refers to the Systematic Assessment of Licensee Performance (SALP) Board Report of the Comanche Peak Facility, Units 1 and 2, Construction Permits CPPR-126 and CPPR-127. The SALP Board met on September 1, 1981, to evaluate the performance of the subject facility for the period July 1, 1980, through June 30, 1981. The performance analyses and resulting evaluation are documented in the enclosed SALP Board Report. These analyses and evaluation were discussed with you at your office in Dallas, Texas, on October 9, 1981.

The performance of your facility was evaluated in the following functional areas: Piping Systems and Supports; Safety-Related Components; Support Systems; Electrical Power Supply and Distribution; Instrumentation and Control Systems; and Licensing Activities.

The SALP Board evaluation process consists of categorizing performance in each functional area. The categories which we have used to evaluate the performance of your facility are defined in Section II of the enclosed SALP Board Report. As you are aware, the NRC has changed the policy for the conduct of the SALP program based on our experiences and the recently implemented reorganization which emphasizes the regionalization of the NRC staff. This report is the product of the revised policy.

Any comments which you may have concerning our evaluation of the performance of your facility should be submitted to this office within 20 days of the date of this letter. Your comments, if any, and the SALP Board Report, will both appear as enclosures to the Region IV Administrator's letter which issues the SALP Report as an NRC Report. In addition to the issuance of the report, this letter will, if appropriate, state the NRC position on matters relating to the status of your safety program.

RPS-B RPS-A  
WCrossman:jc RTaylor  
3/ /82 3/ /82

RPS-A  
RStewart  
3/ /82

RPB1  
GLMadsen  
3/ /82

DRRP&EP  
JGagliardo  
3/ /82

AD/IES  
KVSeyfrit  
3/ /82

RA - RIV  
JTCollins  
3/ /82

APPENDIX

U. S. NUCLEAR REGULATORY COMMISSION  
REGION IV

SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE

Report: 50-445/81-20  
50-446/81-20

Dockets: 50-445 & 50-446

Category A2

Licensee: Texas Utilities Generating Company  
2001 Bryan Tower  
Dallas, Texas 75201

Facility Name: Comanche Peak, Units 1 and 2

Appraisal Period: July 1, 1980, to June 30, 1981

Appraisal Completion Date: September 1, 1981

Licensee Meeting: October 9, 1981

SALP Board:

- G. L. Madsen, Chief, Reactor Project Branch 1
- W. A. Crossman, Chief, Reactor Project Section B
- S. B. Burwell, NRR Project Manager
- R. G. Taylor, Senior Resident Inspector
- R. C. Stewart, Reactor Inspector

Reviewed By: W. A. Crossman  
W. A. Crossman, Chief, Reactor Project Section B

3/29/82  
Date

Approved By: G. L. Madsen  
G. L. Madsen, Chief, Reactor Project Branch 1  
(SALP Board Chairman)

3/29/82  
Date

~~0446124347~~ 4/p

## I. Introduction

Systematic Assessment of Licensee Performance (SALP) is an integrated NRC staff effort to collect available observations and data on an annual basis and evaluate licensee performance utilizing these data and observations as a basis. The integrated systematic assessment is intended to be sufficiently diagnostic to provide a rational basis for allocating NRC resources and to provide meaningful guidance to licensee management.

## II. Criteria

The assessment of licensee performance is implemented through the use of seven evaluation criteria. These criteria are applied to each functional area that is applicable to the facility activities (construction, pre-operation or operation) for the categorization of licensee performance in these areas.

One or more of the following evaluation criteria are used to assess each applicable functional area.

1. Management involvement in assuring quality
2. Approach to resolution of technical issues from safety standpoint
3. Responsiveness to NRC initiatives
4. Enforcement history
5. Reporting and analysis of reportable events
6. Staffing (including management)
7. Training effectiveness and qualification

Attributes associated with the above evaluation criteria form the guidance for the SALP Board for categorization of each functional area in one of three categories. Performance categories are defined as follows:

Category 1. A combination of attributes which demonstrates achievement of superior safety performance; i.e., licensee management attention and involvement are aggressive and oriented toward nuclear safety; licensee resources are ample and effectively used such that a high level of performance with respect to operational safety or construction is being achieved. Reduced NRC attention may be appropriate.

Category 2. A combination of attributes which demonstrates achievement of satisfactory safety performance; licensee management attention and involvement are evident and are concerned with nuclear safety; licensee resources are adequate and are reasonably effective such that satisfactory performance with respect to operational safety or construction is being achieved. NRC attention should be maintained at normal levels.

Category 3. A combination of attributes which demonstrates achievement of only minimally satisfactory safety performance; licensee management attention or involvement is acceptable and considers nuclear safety, but

weaknesses are evident; licensee resources appear to be strained or not effectively used such that minimally satisfactory performance with respect to operational safety or construction is being achieved. Both NRC and licensee attention should be increased.

### III. Summary of Results

<u>Functional Areas</u>	<u>Category</u>
1. Soils and Foundations	NA
2. Containment and other Safety-Related Structures	NA
3. Piping Systems and Supports	1
4. Safety-Related Components	1
5. Support Systems	2
6. Electrical Power Supply and Distribution	1
7. Instrumentation and Control Systems	1
8. Licensing Activities	2

### IV. Performance Analyses

The SALP Board obtained assessment data applicable to the appraisal period of July 1, 1980, to June 30, 1981. The data for the Comanche Peak Steam Electric Station (CPSES) was tabulated and analyzed and a performance analysis was developed for each of six functional areas.

The SALP Board met on September 1, 1981, to review the performance analyses and supporting data and develop the SALP Board Report.

#### Functional Area Analysis

##### 1. Soils and Foundations

All activities completed.

##### 2. Containment and Other Safety-Related Structures

Very limited activities during assessment period.

##### 3. Piping Systems and Supports

Three violations issued to the licensee in the review period were concerned with malfunction in this general area. Two of three involved vendor furnished support/restraint components. The first

Westinghouse and Gibbs & Hill. The principal need for improvement is in an increased participation in the licensing process by the station operations staff. We expect this to improve as the station approaches fuel loading.

Application of evaluation criteria in this area resulted in a Category 2 level.

#### Conclusion

*almost impossible  
considering Rpt 80-25.*

The SALP Board concluded that the licensee has demonstrated an overall combination of attributes exhibiting Category 1 performance during the appraisal period. This evaluation was based upon the three primary areas where the construction efforts, and, therefore, the NRC inspection effort, were directed; i.e., piping, electrical, and instrumentation installations. The Board noted that 1069 of the 1699 inspection-hours were devoted to these three basic areas.

In regard to the licensee's ongoing interactions with NRR, the consensus of the Board was that the licensee has managed these activities in a Category 2 mode.

#### Board Recommendations

Although the SALP Board concluded that the overall licensee performance was Category 1, they did not recommend to the regional office that the inspection level for construction be changed. Programmatic changes for construction inspection have been made that will effectively reduce inspection activities for all construction sites.

### V. Supporting Data and Summaries

#### 1. Report Data

##### a. LER Numbers Reviewed

(Not applicable)

##### b. Construction Deficiency Reports

The licensee formally reported seven Significant Construction Deficiencies that he or his agents had identified during the appraisal period. These are summarized as follows:

- (1) Engineering failure to consider the thickness of architectural concrete on floors when specifying the embedment depth of anchor bolts.





UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION IV  
811 RYAN PLAZA DRIVE, SUITE 1000  
ARLINGTON, TEXAS 76011

*Jay Lin*

November 12, 1980

In Reply Refer To:

RIV

Docket No. 50-445/Rpt. 80-25  
50-446/Rpt. 80-25

Texas Utilities Generating Company  
ATTN: Mr. R. J. Gary, Executive Vice  
President and General Manager  
2001 Bryan Tower  
Dallas, Texas 75201

Gentlemen:

This refers to the meeting held by Messrs. K. V. Seyfrit, W. C. Seidle, W. A. Crossman and R. G. Taylor with you and other members of your staff on October 30, 1980, at your offices in Dallas, Texas, in regard to the regional evaluation of your performance as an NRC licensee.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosed inspection report will be placed in the NRC's Public Document Room. If the report contains any information that you believe to be proprietary, it is necessary that you submit a written application to this office, within 20 days of the date of this letter, requesting that such information be withheld from public disclosure. The application must include a full statement of the reasons why it is claimed that the information is proprietary. The application should be prepared so that any proprietary information identified is contained in an enclosure to the application, since the application without the enclosure will also be placed in the Public Document Room. If we do not hear from you in this regard within the specified period, the report will be placed in the Public Document Room.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

W. C. Seidle, Chief  
Reactor Construction and  
Engineering Support Branch

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U. S. NUCLEAR REGULATORY COMMISSION  
OFFICE OF INSPECTION AND ENFORCEMENT

REGION IV

Report No. 50-445/80-25; 50-446/80-25

Docket No. 50-445; 50-446

Category A2

Licensee: Texas Utilities Generating Company  
2001 Bryan Tower  
Dallas, Texas 75201

Facility Name: Comanche Peak, Units 1 & 2

Meeting at: Dallas, Texas (October 30, 1980)

NRC Participants:

*K. V. Seyfrit*  
K. V. Seyfrit, Director, Region IV

11/12/80  
Date

*W. C. Seidle*  
W. C. Seidle, Chief, Reactor Construction and  
Engineering Support Branch

11/7/80  
Date

*W. A. Crossman*  
W. A. Crossman, Chief, Projects Section

11/5/80  
Date

*R. G. Taylor*  
R. G. Taylor, Resident Reactor Inspector, Comanche  
Peak Station

11/5/80  
Date

*S. B. Burwell*  
S. B. Burwell, Licensing Project Manager, NRR

11/10/80  
Date

Approved:

*W. A. Crossman*  
W. A. Crossman, Chief, Projects Section

11/5/80  
Date

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## DETAILS

### 1. Persons Attending Meeting

#### Licensee Participants

R. J. Gary, Executive Vice President and General Manager, TUGCO  
L. F. Fikar, Executive Vice President and General Manager, TUSI  
B. R. Clements, Vice President, Nuclear Operations, TUGCO  
J. B. George, Vice President and Project General Manager, TUSI  
D. N. Chapman, Quality Assurance Manager, TUGCO  
R. G. Tolson, Site Quality Assurance Supervisor, TUGCO

#### NRC Participants

K. V. Seyfrit, Director, Region IV Office of Inspection and Enforcement  
W. C. Seidle, Chief, Reactor Construction and Engineering Support Branch  
W. A. Crossman, Chief, Projects Section  
R. G. Taylor, Resident Reactor Inspector, Comanche Peak Station  
S. B. Burwell, Project Manager, Licensing Branch 2, NRR

### 2. Meeting With Texas Utilities Generating Company Management

#### a. Purpose of Meeting

The purpose of this meeting was to describe the regional evaluation under the Systematic Assessment of Licensee Performance program. This evaluation is an integral part of the Systematic Assessment Performance (SALP) program which is being implemented in accordance with the commitments of the "Action Plan for Implementing Recommendations of the President's Commission and Other Studies of the TMI-2 Accident." The attached Appendix B is the performance evaluation for the Comanche Peak facilities for the period August 1, 1979, through July 31, 1980, compiled by the NRC participants and a Regional Review Board.

To begin the meeting, the Regional Director outlined the following objectives for the Systematic Assessment of Licensee Performance program:

- Identify exceptional or unacceptable licensee performance
- Improve licensee performance
- Improve the IE inspection program
- Provide and achieve a means of regional consistency in evaluating licensee performance

- Enforcement Action Responses - The NPC personnel indicated that the licensee's responses have been concise, effective and to the point.

9. Effectiveness and Attitudes of Licensee Personnel in Complying with NRC Requirements

- Licensee Quality Assurance Personnel - The NRC personnel stated that the overall impression was that the licensee had upgraded the quality of their personnel at all levels during the past two years.
- Licensee Construction and Engineering Management - The NRC personnel stated that it appears there is a continuing tendency to engineer away construction problems rather than enforce compliance to drawings and specifications. The licensee stated that he is taking several management actions with the engineering and construction personnel to alleviate this situation. The NRC personnel stated that there was no specific regulatory concern since safety does not appear to have been compromised as yet but could possibly be sometime in the future if appropriate actions were not taken as indicated above.
- Brown and Root Quality Assurance - The NRC personnel stated that overall abilities of the Brown and Root QA personnel appeared to have been improved during the past year, in part because of much improved procedural direction being given to them.
- Brown and Root Construction Supervision and Labor Force - The NRC participants indicated that their impression of this area indicated that there is a need to make this group more aware of nuclear power plant construction requirements. That there is a considerable difference to those of a conventional fossil plant. The licensee responded that he has issued instructions to Brown and Root to reduce the labor crew size reporting to foremen and the number of crews reporting to general foremen. The licensee stated that it is expected that this will provide increased control over the quality affecting actions of the labor force.

3. Summary of Licensee Performance

The Region IV Director, at the conclusion of the meeting, emphasized that the licensee has the principal and legal responsibility for all matters regarding the construction and operations of a nuclear power plant as specified in the law and in the Regulations. Corporate management is essential in all phases of the project to assure appropriate execution of the licensee's responsibilities. The licensee responded that he is aware of his responsibilities and that in response to these responsibilities, he continuously increased his involvement in the project during the past three years until he is now essentially in complete control of the project except for the immediate line supervision of the labor force. The licensee indicated that as new or additional involvement becomes necessary, he will respond accordingly.

The Director stated that the region's evaluation of the licensee performance is that it is generally acceptable although continued improvement in certain areas, already discussed, would certainly be desirable .

The Director stated that, on the basis of the evaluation, Region IV does not currently see a need to make any adjustments in the IE inspection program as it relates to the Comanche Peak facilities.



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION IV  
611 RYAN PLAZA DRIVE, SUITE 1000  
ARLINGTON, TEXAS 76012

July 21, 1980

Docket No. 50-498  
50-499

MEMORANDUM FOR: ~~W. C. Seidle~~, Chief, RC&ES Branch  
~~W. A. Crossman~~, Chief, Projects Section

FROM: H. S. Phillips, Resident Reactor Inspector, STP

SUBJECT: SOUTH TEXAS PROJECT INVESTIGATION 79-19  
LESSONS LEARNED

Past history, including QA history, is only valuable if it leads to an improved present or future condition. Team members stated, after the investigation, that NRC managers, supervisors, inspectors and investigators should be made aware of lessons learned from the subject investigation which started on November 2, 1979 and ended January 24, 1980. The following are my observations based on 22 years of QA and technical experience, as well as, the past few years working/observing the NRC inspection system. These comments are constructively offered so that the NRC might improve future investigations and so that the NRC might detect QA program breakdowns at the earliest possible time. Some of the comments are specifically related to the conduct of the investigation while the QA program comments address more generic issues relative to the NRC inspection system.

1. Lessons Learned Relative to QA Programmatic Breakdown

The saying that, "An ounce of prevention is worth a pound of cure" may well apply to the STP South Texas Project QA program partial breakdown. I believe Region IV did the best they could to identify the problems at South Texas Nuclear Project, but were unable to conclusively show a QA programmatic breakdown because they did not have adequate manpower to perform a lengthy and in depth review. It was a very difficult task for the investigation team, which spent nearly 3 months on site, to identify the problems. The team also spent considerable time off site after the investigation documenting the results. After extensive evaluation of the results, the parts of the puzzle came together to give a clear picture of a partial program breakdown.

It is important for NRC managers to realize that QA programs can only be adequately evaluated by more extensive reviews than have been the practice in the past.

- a. Needed Improvement: The NRC does a fair job of evaluating the licensee's establishment of a QA/QC program during the Pre Construction Permit (PRECP) inspection phase, however, after that the NRC's inspection system shifts it's primary attention to random

## A. PROJECT HISTORY

### 1. Chronological Project Milestones

The application for construction permits for Comanche Peak Steam Electric Station (CPSES), Units 1 and 2 were docketed on July 20, 1973. The construction permits (Nos. CPPR-126 and CPPR-127) were issued on December 19, 1974. An LWA was granted to the licensee on October 17, 1974, and ground breaking occurred on October 18, 1974.

There has been no change in principle contractors. Unit 1 is presently in preoperational testing. Precore hot functional testing began on February 20, 1983. The licensees' present projected fuel load date is September 1983. The licensee was granted a license to receive and store fuel (SNM-1912) on April 26, 1983 and began receiving fuel on May 4, 1983. The process will continue over the next several months until all of the 193 fuel elements and associated inserts are received. The fuel is being stored in the new fuel storage facility and spent fuel pool for Unit 1 in the fuel building.

### 2. Principle Contractors

Gibbs & Hill, Inc. (G&H) is the architect-engineer, and Brown & Root, Inc. is the constructor. Construction management is being performed by Texas Utilities Services, Inc., a wholly owned subsidiary of the owner, Texas Utilities. The nuclear steam supply system vendor is Westinghouse Electric Corporation.

## B. QUALITY ASSURANCE ORGANIZATIONAL STRUCTURE

The licensees present QA organization is shown in Exhibit 1. The present structure has not appreciably changed from description in The SAR. The licensee has recently undergone review of the QA program pursuant to 10 CFR 50.55(c). No reduction in the QA program were identified.

## C. SALP REVIEW

Three SALP reviews have been conducted to evaluate TUGCO's performance. The SALP periods were:

August 1, 1979 through July 31, 1980 (Reports 50-445/80-25 and 50-446/80-25)

July 1, 1980 through June 30, 1981 ( Reports 50-445/81-20 and 50-446/81-20)

October 1, 1981 through September 30, 1982 ( Report 50-445/82-24 and 50-446/82-12)



# FOIA-87-847 B/15

2-2

\* Probably A Violation

Y	R	RPT NO	TYPE ITEM	DISC. PLINT	CRITERIA VIOLATED	CRITERIA UNRESOLVED	Change Directly To Appl Cont.	
								Pre CP Insp QA
0001		73-02	V	QA	II	-	x	Pre CP Insp QA
0002		74-02	U	QA	-	V	- AE	Pre CP Insp QA
0003		74-02	U	QA	-	V	- BE	Pre LWA Insp QA
0004		74-03	U	QA	-	V	x BE	Pre CP Insp QA
0005		74-04	U	QA	-	V	BE	Did NOT Develop Soil Procedure Construction Refused Inspect Instead
0006		75-05	V	CIV(C)	V; X	-	- BA	
0007		75-06	V	QA	I; X	-	- BA	
				QA	X; V	-	- BA	
0008		75-06	V	QA	I; X	-	- BE	Org. QA Free Cos Schedule
0009		75-06	U	QA	-	II	x	QA
				NDE	-	IX	- BA	NDE
				SURV.	-	X	x	TUSI SURV
				ALL	-	I	- BA	Organization
				QA	-	V	- BA	Procedures
0010		75-10	V	C	-	V	- RH	Failed to follow Contract Transport R/W/without Procedure Approval; Control NOT By Street
0011		75-10	U	C	-	V	- BA	
				C	-	XV; V	x BA	Did not correct Aggregate Problem Ins ball Embeds Perform SURV w/o Proc Failed to Input Des changes; Repair w/o Proc
0012		75-13	V	C	XVI	-	x RH	
0013		76-01	V	C	V	-	- BA	
0014		76-01	V	QA	III, IV	-	x AE	
			V	QA	X, V	-	- BA	
0015		76-01	U	QA	-	X*	- BA	Exam/Repair NOT Per Code / GH Spec Base mat Hanley Combination BR Cadwelded w/ Procedure
0016		76-04	U	C	-	V	- BA	TUSI QA SURV
0017		76-07	V	C	V, IX	-	- BA	Did Not Stop Work
0018		76-07	D	QA	II	-	x	Liner For Inc NOT Completed
0019		76-07	U	QA	-	V	- CB	Survey Control Bad; SURV Defect NOT Rpt Concrete Cylind Test w/ - 1 wheel
0020		76-08	V	QA	VI	-	- BA	
				SURV	XV	-	x	
0021		76-08	U	QA/C	-	XVII*	- BA	

P/15

Track	RPT No.	Type Item	Disc./Area	Criteria Violated	Criteria Unresol	CHARGE APPL.	DIRECTLY TO CONTRACTOR	
0021	76-08	u	QA/m	-	III <sup>*</sup> ; X <sup>*</sup>	-	BA	Waived Test Cy
0022	76-09	u	QA	-	VII <sup>?</sup>	x	BA	Fab. P. ac w/o A
			QA	-	XV <sup>*</sup> ; I	-	BA	Site P. ac
0023	76-10	u	QA	-	XVII	-	BA	Trans. Dring
0024	76-11	u	C	-	III	-	BA	GH Spec. Rec
0025	76-12	u	QA	-	IV	-	BA	put on Site
0026	77-01	u	C	-	V	-	BA	mesh left
0027	77-02	V	C	XI; II	-	-	BA	Concrete
0028	77-02	D	M	II	-	-	BA	Dring Contr.
0029	77-02	u	QA	-	V	-	BA	Procedure
0030	77-04	u	C	-	XV <sup>*</sup>	-	BA	Concrete
0031	77-05	u	Environ.	-	V	x	-	Curving
0032	77-06	u	QA/m	-	VII <sup>*</sup>	x	-	Level I Ins
0033	77-07	u	C	-	III	x	-	Not Teste
0034	77-08	u	QA/m	-	VII <sup>*</sup> , IX <sup>*</sup>	x	-	Deviation
0035	77-09	u	C	-	V	-	BA	ASME
0036	77-09	u	C	-	V <sup>*</sup>	x	BA	Nonconform
0037	77-10	V	M	X	-	-	BA	Procedure
0038	77-10	V	M	IX, V	-	-	BA	Anchor Bol
0039	77-10	u	M	-	XIII	-	BA	Omitted
0040	77-10	u	M	-	VII <sup>*</sup> cannot	x	-	Polar Crane
0041	77-11	u	M	-	VII <sup>*</sup>	x	-	well det
0042	77-11	u	M	-	III <sup>*</sup>	-	BA	Design change
0043	77-11	u	QA	-	III <sup>*</sup>	x	-	Piezometer
0044	77-13	u	C	-	III <sup>**</sup>	x	BA	Polar Crane
0045	77-13	u	M	-	X <sup>*</sup> , XVII <sup>*</sup>	-	BA	Radio graph
0046	78-04	u	M & E	-	XIII	-	BA	Cold Joint
0047	78-05	u	QA	-	VII, XVII <sup>modified</sup>	x	BA	in FHB
0048	78-05	V	M	-	X, V	-	BA	Line Plate
0049	78-07	D	C	-	XI	-	BA	Bulk



Work Order #	RPT No	Type	Discipline	Criteria Violated	Criteria Unresolved	Charge Directly To App Contractor
1050	78-07	U	E	-	V *	- BA Elct Equip Storage
1051	78-07	U	QA	-	II, VII *	x All Vnd Control of All under
1052	78-08	V	Env.	V	-	x -
1053	78-09	U	C	-	XI *	- BA Reactivity of Son
1054	78-11	V	M	Y	-	- BA Failure to follow
1055	78-12	V	M	IX, V	-	- BA Cleanliness Proc
1056	78-12	U	M & E	-	X, V *	- BA Failed to use
1057	78-12	V	E	XV	-	- BA for Procedure
1058	78-12	U	C	-	V *	- BA AWS Reg. Not
1059	78-13	V	M	IX, X	-	- BA in Weld Procedure
1060	78-13	V	C	XI, V	-	- BA Failure to follow
1061	78-13	U	M	-	VII, X *	- BA Segregate Equip
001262	78-16	V	ALL	10CFR 50.55(e)	-	- BA Coating
00363	78-16	D	C	XI	-	- BA Procedure
1064	78-18	U	QA	-	VI *	- BA Failure to Monitor
0065	78-18	V	M	IX	-	- BA Weld Procedure
0066	78-20	D	M	IX, VII	-	- BA Failure to follow
1067	79-01	U	M	-	VII *	- BA Concrete Test Proc
0068	79-03	V	C	V	-	- BA West. Material
0069	79-04	V	M	XIII, V	-	- BA Certs Not Available
0070	79-04	D	E	V, III	-	- BA Failure to Report
0071	79-04	U	C	-	III	- BA Failure to Comply
0072	79-06	U	E	-	III *	- BA with R.C. 1.15
0073	79-06	V	E	X, V	-	- BA Draw Out of Date
0074	79-07	U	M	-	III *	- BA Failed to follow
0075	79-07	U	M	-	VII	- BA Weld Procedure
0076	79-08	U	M	-	VII, X	- BA Vendor Radiograph
0077	79-11	V	C/QA	II	-	- BA Unacceptable
0078	79-18	V	M	XIV, IX	-	- BA Seismic Qual
0079	79-18	V	E	X	-	- BA of Value

Track	Rpt No	Type Item	Disc./ Area	Criteria Violated	Criteria Unresolved		
0080	79-18	V	QA	X, XVII	-	-	BA Impedim, Not Documented
0081	79-18	V	QA	X	-	-	BA QC Stamps, Not Consistent
0082	79-18	U	QA/E	V	-	-	BA Traveler Lacked Instructions
0083	79-19	V	QA	X	-	-	BA QC Failed To Red Tag/Segregate Ego IE Cable Cables
0084	79-19	V	E	VIII, XIII?	-	-	BA Deteriorating
0085	79-23	U	M	-	X*, V*	-	BA No Procedure To D
0086	79-23	U	ALL	-	V →	-	BA Traveler Syst for Redundant Procedure for Traveler Conce
0087	79-23	U	C	-	X	-	BA Concrete Inspecti
0088	79-24	U	M/E	-	IX*, XIII*	-	BA Questioned By Allen
0089	79-25	U	E	-	V*, II*	-	BA Protect Equip. Et
0090	79-27	V	M/E	V, XIII	-	-	BA During Welding
0091	79-27	V	QA SU.SS(e)	V	-	-	BA Cable Installati
0092	79-27	U	M	-	III* (1, 8, 9, 11)	X	BA No Procedure f
0093	79-28	V	M/E	V; X	- →	-	BA Handling Congres
0094	79-28	U	M	-	V; XI	X	BA Obsolete QA Proc
0095	79-28	U	E	-	XI	X	BA Hammer Class 5
0096	79-31	V	M	IX	-	-	BA Conflict FSA vs F
0097	80-01	U	E	-	VII	X	BA Traveler Did Not
0098	80-01	U	M	-	III*	-	BA Reference AEKmsi
0099	80-01	V	E	X	-	-	BA Pre-service Proce
0100	80-03	V	E	V	-	-	BA To Acquire NOE RPT To
0101	80-03	U	M	-	VII	X	BA EQ Approval, Ot B
0102	80-08	V	E	V, XV	-	-	BA Remote Penetration by
0103	80-08	V	ALL	10CFR 50.55(e)	-	X	BA Improper Weld
0104	80-08	U	E	-	VII*, XI*, XVII*	X	BA Rod Used
0105	80-08	U	E	-	V	-	BA AE Review of EQ
0106	80-09	V	Env	V	-	X	BA Test Rpt Not Appr
0107	80-11	V	M	XIII	-	-	BA BER Mod of P.f
0108	80-13	V	M	IX	-	-	BA Derivates from FS
0109	80-13	V	E	X	-	-	BA QC accepted Bad

Ref No	Type Item	Disc/ Area QA	Criteria Violated	Criteria Unresolved	Charge Directly To App Contractor	CCF	
0110	80-15	V	M	II III	-	X BR	2500 Hangers not eval f impacton safety syst. Supp fab w/o Tolerances
0111	80-15	V	M	V	-	- BR	Inspection Record Do not show final inspec
0112	80-15	U	QA	-	X	- BR	Pipe Weld Prep Not Per Design
0113	80-17	V	M	IX, III	-	- BR	3rd Failure to Rpt
0114	80-17	V	M	10CFR50.514	-	X -	No weld Return on Beam Seat Clips To Column
0115	80-18	U	M	-	IX	- BR	Anchor Bolt Installation To meet Design Load
0116	80-18	U	C	-	III	X BR	NDE/weld Interpretation By CIBT Unacceptable
0117	80-20	V	M	IV	-	- BR	Pressurizer Valve Mislocated
0118	80-20	V	M	V	-	- BR	Cable Separation of Non/safety Cable
0119	80-20	U	E	-	III	- BR	Storage of Fuel Racks
0120	80-20	U	M	-	XIII	- BR	Pipe Whip Restraints
0121	80-22	V	M	IX	-	- BR	Weld Not Full Penetration
0122	80-22	U	M	-	IX*	- BR	Hold Points NOT on Weld Data Card - Travel
0123	80-27	U	E	-	XI*, XVII*	X -	Vendor Qual Elect Cables
0124	80-02	V	M	IX	-	- BR	Unauthorized Tack Weld To Valve Body
0125	81-05	U	C	-	III	- BR	Epoxy Grout Strength At High Temp
0126	81-05	U	M	-	III, VII*	- BR	Diesel Generator mfg. Vendor AISC vs ASMEC
0127	81-05	U	M	-	IX*	- BR	NDE Technique RT Unacceptable
0128	81-02	U	C	-	III*	- BR	(Pb-) Depth of Anchor Bolts Into Concrete
0129	81-10	U	E	-	V*	X -	Post Turnover of Equipment to Ops
0130	81-11	U	M	-	XIII*	- BR	Proper Handling of Pump Casings
0131	81-13	U	M	-	III*	X BR	As built Dwg. (P4) Procedure Revised to Conit
0132	81-13	U	M	-	X*	X BR	Design vs As Built Hanger/Supp. P. Hanger
0133	81-14	U	M	-	IX*	- BR	Multiple Repair of Stainless Weld w/o App.
0134	81-15	V	M/C	X, XVII	-	- BR	Coat Records on Steel
0135	81-15	U	QA	-	XVII	X -	Cable Supp Nonexistent; No TUGCO Audit of Contin
0136	81-16	U	C/M/E	-	III**	X -	Failure consider App. A Re i.e. failure non-saf. on Saf
0137	81-19	U	M	-	III*	- BR	Design Spec. Mat. The Latest Revision
0138	81-19	U	M	-	X* III**	- BR	Design Change Modification Not Inspected
0139	82-01	U	QA	-	I*	X BR	ASME Reg. Per FSAR Deleted By Spec.

RPT No	Type Item	Discipl Area	Criteria Violated	Criteria Unresolved	Charge Directly To App Contractor	Applicant Analysis Resulted in Mod.
40 82-01	u	E	-	V *	-	BR Instrument Procedures w/o Detailed Instructions
41 82-01	u	E	-	V ?	-	BR Cable Pull over Sharp Bend Radius
142 82-03	v	M	-	VII	-	SW SW Fab Pipe Center Not Marked
143 82-09	u	M	-	XVI *	-	Vendor Document w/o Obj. Evidence Test Results
44 82-05	u	M	-	VII, XI	-	Design Calc. Error
145 82-11	v	M	-	III	*	Nuke Raised to Viol. later
146 82-10	u	M	-	X	-	Inspection Polar Crane Shims
147 82-11	v	M	II, IX	VII *	-	Vendor QA / Inspection Problems - Pipe Whip Restr. NDE Level II Not Trained
148 82-11	u	M	-	X, III	-	BR Design of Piping - As Built Inspection
149 82-19	u	M	-	VII *	-	Under AWS welds on Vendor Pans
150 82-09	u	M	-	VII	-	Vendor NDE Certs / Data Change
151 82-14	u	M	-	X, V	-	BR No Procedure for Inspection of Stacked Welds
152 82-11	v	M	X	-	-	BR NDE Material Cert Not Inspected
153 82-22	u	M	-	XVII *	*	- Audits Pgm Breakdown
154 82-22	u	M	-	VII, X	*	BR Deficient Inspection of Deficient NPST Hardware
155 82-30	v	M	III	-	-	BR Design Review of TTT Grinnell / Nuc Pow Sys Trade
156 82-25	v	M	II	-	-	BR Inspection Certification
157 82-25	v	ALL	XVIII	-	*	- TUGCO Audits of NPS Inadequate
158 82-26	u	M	-	III *	*	- Design for Anchor Bolts Inadequate
159 82-26	u	M	-	XI	*	BR Richmond Ins. Int. Test Data Questioned
160 82-26	u	M	-	III	*	- RTR To Review Modification, Stability of Spring
161 82-26	u	M	-	III	*	- Design / Construction Local Pipe Stress
162 82-26	u	M	-	III	*	- Acceptability Correction of
163 82-26	u	M	-	III	*	- CC-2-068-709-1943
164 82-26	u	M	-	III	*	- Appl. Design Reviews
165 82-26	u	M	-	III	*	- Pipe / Suppts Per NKE Stress Analysis
166 83-03	v	M/E	II	-	*	- Failure To Properly Classify Lights
167 83-07	v	M	IX	-	-	BR Weld Gap Tol. Exceeded
168 83-07	u	C	-	V	-	BR Coating Procedures per Mfg. - Adh. Test
169 83-07	u	C	-	X *	-	BR Coating Cure Time

	RPT NO	Item Type	Disc/ Area	Criteria Violated	Criteria Universal	Charge Directly To App Contractor	Subject
100	84-22	V	C/E/M	III	-	-	BR BISCO Remetration Seals Violated / Broken - As Bu.
101	84-22	V	M	III, V	-	-	Safety Inspect Support not Installed / Inspected - As Bu.
202	84-22	U	C/M/E	-	VII, XVII	-	BISCO Material Cert not Specif As To Reg. Mat
203	84-22	U	M/E	-	III	X	Battery Room Design - Hy gen Building
204	84-26	V		II, V	-	-	Inspection Criteria was no Provided
205	84-26	V	E	X	-	-	Inspection of Cable Trays Inadequate
206	84-26	U	E	-	III **	-	Field Instrument Sheets In Only Marked As Built
207	84-29	V	M	IX	-	-	weld Interpass Temp. Violated
208	84-34	V	M	X, II	-	-	Inadequate Installation
209	84-34	V		10 CFR 50.55(c)	-	X	Inspection Snubber Swags Failure To Rpt Constr Def
210	84-40					X	Construct Deficiency True
211	84-40	U	ALL		10 CFR 50.55(c)	X	No Improperly Assigned Evaluation of RTE Delta
212	84-44	U	FP	-	V **	X	Not In File
0213	84-44	U	FP	-	V **	X	Fire Protection Procedures Deficient
0214	84-44	U	FP	-	V	X	Surv/Test Procedures Confli with Tech Spec / No Intert. Rec
0215	84-44	U	FP	-	III	X	Fire Pump Capacity - Part Plot not in Procedure
0216	84-44	U	FP	-	III	X	Emergency Lighting Inad greater
0217	84-44	U	FP	-	XI	X	Pressurizer Trans Forme
0218	84-44	U	FP	-	III **	X	Fire Protection Questione
0219	84-44	U	FP	-	V	X	Fire Control Panel Not As Approved By National Lab
0220							Sprinkler As Installed
0221							violates NFPA 13
0222							Applicant Appendix K Non
0223							Incomple
0224							
0225							
0226							
0227							
0228							



rank	RA No	TYPE Item	Disc Area	Criteria Violated	Criteria Unresolved	Charge Directly TO Ngg Contractor	Subject	
170	83-15	V	M	IX	-	-	BR	NDE - Bow Metal Repair
171	83-15	V	M	IX	-	-	BR	NDE - Film Density
172	83-15	U	M	-	IX <sup>*</sup> , XVII <sup>*</sup>	-	BR	NDE - UT Records
173	83-15	U	M	-	IX <sup>*</sup> , II <sup>*</sup> , V <sup>*</sup>	-	BR	NDE - Preserv./NDE Proc
174	83-15	U	M	-	IX <sup>*</sup> , XVII <sup>*</sup>	-	BR	NDE - Level III Cont.
175	83-15	U	M	-	IX <sup>*</sup> , VII <sup>*</sup>	-	Vendor	Borg Warner RT Unacc
176	83-23	V	M	III	-	-	BR	As Built - Ins g. Unacc
177	83-23	V	M	X	-	-	BR	Ins g./Install Jun Nut.
178	83-23	U	E	-	V <sup>**</sup> Ngg Rpt'd	-	BR	QA Records Review w/o P
179	83-23	U	C	-	V <sup>*</sup>	-	BR	Install Anchor Bolts Exceed
180	83-23	U	QA	-	V <sup>**</sup>	-	BR	Turnover Punchlist w/o Pr
181	83-2	U	QA	-	XVIII	X	-	Audit Result Not Repn
182	83-24	U	E	-	V <sup>?</sup>	-	BR	Cable Splices, IEEE-421 Interpretation
183	83-24	V	M	V, III, X	-	-	BR	NUAC ; as Built; Ins g.
0184	83-24	U	M	-	V <sup>*</sup>	-	BR	Bolt/Nut Tighten Req.
0185	83-24	V	M	VI, III <sup>?</sup>	-	-	BR	Obsolete Dwg In Field Unaccept Dwg - Incompl
0186	83-24	V	M/E	XVII	-	-	BR	Storage Elec/Mech Equip
0187	83-28	U	E	-	III	-	BR	Conduit To Close To FL-Lig
0188	83-47	U	C	-	VII, <sup>**</sup>	-	W	Improper/Damage Coat On West. Comp - Effect E.
0189	84-08	V	M	V X	-	-	BR	Polar Crane Gaps
0190	84-08	V	M	X	-	-	BR	Inspection Main Loop X-Over Legs
0191	84-08	D	M	III	-	X	BR	Design Info For Ins Struct Steel Ignor
0192	84-08	U	M	-	IX	-	BR	Tack Weld Polar Cran Connection Question
193	84-10	U	M	-	V <sup>**</sup> , III <sup>**</sup>	-	BR	Fire Door Rating 3 Hr But Tubing Thru Door
0194	84-16	V	E	X, V	-	-	BR	Improper Inspection Install Cable Tray Han
0195	84-16	V	M	III	-	-	BR	Design Documents Not Controlled
196	84-16	U	C	-	III	-	BR	Change From Controls To Circuit Questioned
0197	84-16	U	M	-	VII <sup>**</sup>	-	Vendor	Hydrogen Recombiner Outs. Specified Volts
198	84-22	V	E	V	-	-	BR	Failure To Maintain Posi Press on Elect Penetrator
0199	84-23	V	ALL	10 CFR 50.55e	-	X	-	Failure To Report Defic

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# 50.55(c) Deficiency Trends

(i) OA Breakdown

(ii) Final Design

(iii) Significant Construction Deficiency / Damage

(iv) Significant Deviation from Performance Spec.

R. Reportable

N. Not Reportable

C. Civil

E. Electrical

M. Mechanical

Track No.	(i)	(ii)	(iii)	(iv)	C	E	M	Appendix B Criterion Related To
D-1-0134			✓			✓	✓	N I Diesel Generator valve Spring defect
D-1-0133		✓					✓	N XI, XII Globe Valve not per 2000 Std
D-1-0132		✓					✓	R III Flooding of Pumps
D-1-0131		✓					✓	N XI EQ Main Steam Relief Valves may not be correct
D-1-0130		✓					✓	N XII Insulation Flange Contact
D-1-0129			✓			✓		N XIII cable Insulation Damage
D-1-0128						✓		N XII Accident Analysis vs Tech Spec made 3 - EQ
D-1-0127		✓					✓	P III EQ HECB
D-1-0126			✓			✓		N IV Cables may be Damaged by Thermal lag
D-1-0125			✓			✓		N XIII Rodent Damage to cable
D-1-0124			✓				✓	N VII Deleted Turbocharger Bearing Lub
D-1-0123			✓				✓	R III Fire Dragers Installed w/o Gap
D-1-0122			✓			✓		R IV Control Room Cabinet Termination not properly crimped
D-1-0121		✓						N III Tube Sheet Modulus Design Pipe Supports
D-1-0120			✓		✓			N XI Paint Adhesion Test
D-1-0119		✓				✓		N III Ferroresonant Transformer winding Failure
D-1-0118			✓			✓	✓	R VII Instrumentation Tube Cracked
D-1-0117			✓			✓	✓	R IX Diesel Generator Piston Rod Welds Have Linear Cracks
D-1-0116			✓				✓	R VIII Lamination in Steel Columns Cable Break Room
D-1-0115		✓			✓	✓	✓	R III Control Room HVAC / Cabinet Protection
D-1-0114			✓			✓	✓	R XII Boston Transmitter Errors Calibration
D-1-0113			✓			✓		R VII Supplied 480V Saw Gear Broken Weld
D-1-0112			✓				✓	R VII Corroded Posi Seal Butterfly valves
D-1-0111			✓		✓		✓	R III Containment Bld Cooling Syst. Insulation Ring Aspflo
D-1-0110			✓				✓	R XII Pipe Configuration Relief Valve Settling spent Fuel Pool
D-1-0109		✓			✓		✓	R IX Welding Inspection Rx Coil Safety being invalidated by Hydro
D-1-0108			✓		✓	✓	✓	R VI Cable Tray Bolting
D-1-0107			✓			✓		N IX Heat Sink Fans Gapped to NDC Cards Failure
D-1-0106			✓				✓	N V Jam Nuts Improper Installed
D-1-0105			✓				✓	N VII NPSI material Rtd w/o NPS Testing
D-1-0104			✓				✓	R CW Pump Installed w/o Auto Isolation
D-1-0103			✓				✓	R Let down Heat Exchanger Anchor Bolts Restrict Expansion
D-1-0102			✓			✓		R RX Trip Switch Malfunction

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# 50.55(e) Deficiency Trends

(i) OA Breakdown

(ii) Final Design

(iii) Significant Construction Deficiency / Damage

(iv) Significant Deviation From Performance Spec.

R. Reportable

N. Not Reportable

C. Civil

E. Electrical

M. Mechanical

Track No. (i) (ii) (iii) (iv) C E M R Appendix B Criterion Related To

D-1-0167		✓				✓	R	VII - Vendor Supplied Pipe
D-1-0166		✓		✓			N	III/IV - Rx Hatch Bear Against Beam
D-1-0165		✓			✓	✓	R	IX, XV - Unauthorized Repairs
D-1-0164			✓		✓		R	XII - Unacc. Setpoint - Aux Feed
D-1-0163						✓	R	III - Undetected Failure ESF Act Syst.
D-1-0162	✓				✓		R	III - Instrument Installed Not Per Design
D-1-0161	✓				✓		R	I, II Reliance Control Board - EQ Design
D-1-0160	✓					✓	P	III Valve Wts Used Stress Anal Different
D-1-0159	✓					✓	R	III Sump Iso Valve Mtrs Not Qualified
D-1-0158		✓			✓		P	V - Electrical Butl Splices Not Per Industry Std
D-1-0157								IV - Wiedmuller Termination Points Damaged
D-1-0156	✓				✓	✓	R	III - DG Air Filter Bowl Underrated For Pressure
D-1-0155	✓					✓	R	CS valve opening Time Wrong
D-1-0154	✓	✓		✓		✓	R	III - SG Bolts Short Do Not meet Design Criteria / Design
D-1-0153	✓	✓			✓		R	III - 3 Hour Door Design Violated
D-1-0152	✓	✓					N	III - Control Room Cable Separates Sep. Criteria
D-1-0151	✓					✓	N	VII - Bolt Mat'l Not Chemically Analyzed Per ASME III
D-1-0150	✓			✓		✓	N	VII - Vendor Eye Exam Falsified
D-1-0149				✓	✓		N	III - 1" in. mee To Floor channel welds Suspect
D-1-0148			✓		✓		N	III/VII 60V Relays Outside operating Spec.
D-1-0147			✓		✓		N	VII Barton Press Sw Set Point Drift
D-1-0146	✓			✓	✓		R	III Nonseismic wall in Control Room
D-1-0145	✓				✓		N	III Safety Class Instrument Line - Seismic Interception
D-1-0144	✓				✓		R	III - Control Room Line/Habitability
D-1-0143	✓		✓		✓		R	III/VII Heavy Transmitters Rosemount
D-1-0142	✓	✓				✓	R	III Ventilation Exchange Dampers (EQ)
D-1-0141	✓				✓		N	III - NSSS Aux Relay Rocks Not qualified (EQ)
D-1-0140	✓					✓	N	III/VII Air operated Diaphragm Valves Natural Frequency Loss Reg (EQ)
D-1-0139	✓				✓		N	XIII Preng Testing / Falsification
D-1-0138		✓			✓		N	VIII Connex Elec Connector Came Off
D-1-0137	✓						N	III CCW Design Concern
D-1-0136	✓					✓	N	XI Class 1 Piping Does Not meet UT Requirements
D-1-0135		✓					N	XI Resil Gasket Material

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# 50.55(e) Deficiency Trends

(i) OR Breakdown

(ii) Final Design

(iii) Significant Construction Deficiency / Damage

(iv) Significant Deviation From Performance Spec.

R. Reportable

N. Not Reportable

C. Civil

E. Electrical

M. Mechanical

Track No.	(i)	(ii)	(iii)	(iv)	C	E	M	Appendix B Criterion Related To		
D-1-0134			✓			✓	✓	N	IX Diesel Generator Valve Springs Defect	C
D-1-0133		✓					✓	N	XI Globe Valve not per IEEE Std XI, III	C
D-1-0132		✓					✓	R	II Flooding of Pumps	C
D-1-0131		✓					✓	N	IX EQ Main Steam Relief Valves may not be correct	C
D-1-0130		✓					✓	N	XII Insulation Flange Contact	C
D-1-0129			✓			✓		N	XIII Cable Insulation Damage	C
D-1-0128						✓		N	III Accident Analysis vs Tech Spec made 3-ER	C
D-1-0127		✓					✓	P	III EQ HECB	C
D-1-0126			✓			✓		N	IV Cables may be Damaged by Thermoplag	C
D-1-0125			✓			✓		N	XIII Rodent Damage To II Cable	C
D-1-0124			✓				✓	N	VII Delayed Turbocharger Bearing Lub	C
D-1-0123			✓				✓	R	III Fire Dampers Installed w/o Gap	C
D-1-0122			✓			✓		R	IX Control Room Cabinet Termination not properly crimped	C
D-1-0121		✓						N	III Tube Sheet / Modules Design Pipe Supports	C
D-1-0120			✓		✓			N	IX Paint Adhesion Test	C
D-1-0119		✓				✓		N	III Ferroresonant Transformer Winding Failure	C
D-1-0118			✓			✓	✓	R	IX Instrumentation Tube Cracked	C
D-1-0117			✓			✓	✓	R	IX Diesel Generator Push Rods Welds Have Linear Cracks	C
D-1-0116			✓				✓	R	VII Lamination in Steel Columns Cable Spread Room	C
D-1-0115		✓			✓	✓	✓	R	III Control Room HVAC / Chlorine Detection	C
D-1-0114			✓			✓	✓	R	XII Barton Transmitter Errors Calibration	C
D-1-0113			✓			✓		R	IX Supplied 480V SW Gear Broken at 480V	C
D-1-0112			✓				✓	R	VII Corroded Posi Seal Butterfly Valves	C
D-1-0111			✓		✓		✓	R	III Containment Bld Cooling Syst. Insulation Ring Airflow	C
D-1-0110			✓				✓	R	XII Pipe Configuration Relief Valve Settling Spent Fuel Pool	C
D-1-0109		✓			✓		✓	R	IX Welding Lugs on RX Coil Safety Ring Invalidated by DM	C
D-1-0108			✓		✓	✓	✓	R	VI Cable Tray Bolting	C
D-1-0107			✓			✓		N	IX Heat Sink Fins Gapped to NDE Cords Failed	C
D-1-0106			✓				✓	N	IV Jam Nuts Improper Installed	C
D-1-0105			✓				✓	N	VII NPSI material Rcd w/o NDE Testing	C
D-1-0104			✓				✓	R	CW Pump Installed w/o Auto Isolation	C
D-1-0103			✓				✓	R	Let down Heat Exchanger Anchor Bolts Restrict Expansion	C
D-1-0102			✓			✓		R	II RX Trip Switch Malfunction	C



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# 50.55(e) Deficiency Trends

(i) OA Breakdown

R. Reportable

C - Civil

(ii) Final Design

N. Not Reportable

E - Electrical

(iii) Significant Construction Deficiency / Damage

M. Mechanical

(iv) Significant Deviation From Performance Spec.

Track No.	(i)	(ii)	(iii)	(iv)	C	E	M	Rot	Appendix B Criterion Related To	Sta.
D-1-0167		✓					✓	P	VII - Vendor Supplied Pipe	0
D-1-0166		✓		✓				N	III/IV - Rx Hatch Bear Against Beam	0
D-1-0165		✓			✓	✓		R	IX, XV - Unauthorized Repairs	0
D-1-0163			✓		✓			R	XII - Unacc. Set point - Aux Feed	0
D-1-0164						✓		R	III - Undetected Failure ESF Act Syst.	0
D-1-0162	✓				✓			R	III - Instrument Installed Not Per Design	0
D-1-0161	✓				✓			R	III/III Reliance Control Board - EQ Design	0
D-1-0160	✓					✓		P	III Valve wts Used Stress Anal & Affected	0
D-1-0159	✓					✓		R	III Sump Iso Valve Mtrs Not Qualified	0
D-1-0158		✓			✓			P	V - Electrical Butl Splices Not Per Industry Std	0
D-1-0157									II - Wiedmuller Termination Points Damaged	0
D-1-0156	✓				✓	✓		R	III - DG Air Filter Bowl Underrated For Pressure	0
D-1-0155	✓					✓		R	CS Valve Opening Time Wrong	0
-1-0154	✓	✓		✓		✓		R	III - SG Bolts Short Do Not meet Design Criteria / Design	0
D-1-0153	✓	✓			✓			R	III - 3 Hour Door Design Violated	0
D-1-0152	✓	✓						N	III - Control Room Cable Separates Sep. Criteria	0
D-1-0151	✓					✓		N	VII - But Ma Fil Not Chemically Analyzed Per ASME III	0
D-1-0150	✓			✓		✓		N	XII - Vendor Eye Exam Falsified	0
D-1-0149				✓	✓			N	IX - The mec To Flow channel Welds Suspect	0
D-1-0148			✓		✓			N	III/VII 60V Relays Outside Operating Spec.	0
D-1-0147			✓		✓			N	VII Barton Press Sw Set Point Drift	0
D-1-0146	✓			✓	✓			R	III Non seismic wall in Control Room	0
D-1-0145	✓				✓			N	III safety Class Instrument line - seismic Integration	0
D-1-0144	✓				✓			R	III - Control Room line/Habitability	0
D-1-0143	✓		✓		✓			R	III/VII Heavy Transformers Rosemount	0
D-1-0142	✓	✓				✓		R	Ventilation Exchange Dampers (EQ)	0
D-1-0141	✓				✓			N	III - NSSS Aux Relay Racks Not qualified (EQ)	0
D-1-0140	✓					✓		N	III/VII Air operated Diaphragm Valves Natural Frequency Less Reg (EQ)	0
D-1-0139	✓				✓			N	XVII Preop Testing / Falsification	0
-1-0138		✓			✓			N	XIII Connx Elec Connector Came Off	0
D-1-0137	✓							N	III CCW Design Concern	0
D-1-0136	✓					✓		N	XI class 1 piping does not meet UT requirements	0
D-1-0135		✓						N	XI Diesel Generator Material	0



# UNIT 1/2 INSPECTION FINDING HISTORY FROM RIV REPORTS

Denotes that unresolved for  
Probably A violation

CR	RPT	TYPE	DISCI.	CRITERIA	CRITERION	Blame Changed Directly To Applicant	App. Applicant Cont. Contractor AE - ARCHITECT ENG
NO.	NO	ITEM	PLINE	VIOLATED	UNRESOLVED		
0001	73-02	V	QA	II	-	x	Pre CP Insp QA
0002	74-02	U	QA	-	V	- AE	Pre CP Insp QA
0003	74-02	U	QA	-	V	- BR	Pre CP Insp QA
0004	74-03	U	QA	-	V	x BR	Pre LWA Insp C
0005	74-04	U	QA	-	V	BR	Pre CP Insp C
0006	75-05	V	CIV(C)	V; X	-	- BR	Did NOT Develop Soil Procedure Construction Rerfor ed Inspect Instead C
0007	75-06	V	QA	I; X	-	- BR	
			QA	X; V	-	- BR	
0008	75-06	V	QA	I; X	-	- BR	Org. QA Free Cos Schedule
0009	75-06	U	QA	-	II	x	QA
			NDE	-	IX	- BR	NDE
			SURV.	-	X	x	TUSI SURV
			ALL	-	I	- BR	Organization
			QA	-	V	- BR	Procedures
0010	75-10	V	C	-	V	- RH	Failed to follow Concrete Transport RW without procedure Approval; Control NCP By Street.
0011	75-10	U	C	-	V	- BR	
			C	-	XV; V	x BR	Did not correct Aggregate Problem In Ball Embeds Perform SURV w/o Pre Failed to Input Des changes; Repair w/o Pre
0012	75-13	V	C	XVI	-	x RH	
0013	76-01	V	C	V	-	- BR	
0014	76-01	V	QA	III, V	-	x AE	
		V	QA	X, V	-	- BR	
0015	76-01	U	QA	-	X*	- BR	Exam / Repair NOT Per Code / GH Spc Base mat Hanly- Combining BR Cast w/eld w/ Procedure
0016	76-04	U	C	-	V	- BR	TUSI QA Sugs D.d. Not Stop Work Liner For Ins NOT Completed
0017	76-07	V	C	V, IX	-	- BR	Over Control Bad; SURV. Defic. NOT Rpt Concrete Cylinders Test W/eld w/ blue Flag w/o bur
0018	76-07	D	QA	II	-	x	
0019	76-07	U	QA	-	V	- CB	
0020	76-08	V	QA	VI	-	- BR	
			SURV	XV	-	x	
0021	76-08	U	QA/C	-	XVII*	- BR	

Track	Rtr No.	Type Item	Disc./ Area	Criteria Violated	Criteria Unresol	CHARGE APPL.	DIRECTLY TO CONTRACTOR	
0021	76-08	u	QA/m	-	III <sup>*</sup> ; X <sup>*</sup>	-	BA	Waived Test Cyl.
0022	76-09	u	QA	-	VII <sup>?</sup>	x	BA	Fab Pipe w/o Dev.
			QA	-	XV; I	-	BA	Site Purchas...
0023	76-10	u	QA	-	XVII	-	BA	Trans... GH Spec Rev. not on site mesh left in concrete
0024	76-11	u	C	-	III	-	BA	Dwg Contro
0025	76-12	u	QA	-	V	-	BA	Procedure
0026	77-01	u	C	-	V	-	BA	Concrete Curing
0027	77-02	V	C	XI; II	-	-	BA	Level 2 In spec
0028	77-02	D	M	II	-	-	BA	Not Tested Deviation & ASME Code
0029	77-02	u	QA	-	V	-	BA	Nonconformance Procedures
0030	77-04	u	C	-	XV <sup>*</sup>	-	BA	Anchor Bolt Omitted
0031	77-05	u	Environ.	-	V	x	-	-
0032	77-06	u	QA/m	-	VII <sup>*</sup>	x	-	Polys Crane well & steel
0033	77-07	u	C	-	III	x	-	Design change - Piezometer
0034	77-08	u	QA/m	-	VII <sup>*</sup> , IX <sup>*</sup>	x	-	Polys Crane Ready grain Cold Joint in FWS liner plate Bulge
0035	77-09	u	C	-	V <sup>*</sup>	-	BA	Inadequate Inspect
0036	77-09	u	C	-	V <sup>*</sup> SO. SSe <sup>*</sup>	x	BA	Weld Procedure not B.1. Available
0037	77-10	V	M	X	-	-	BA	Storage SSP. p.
0038	77-10	V	M	IX, V	-	-	BA	ITT Grinnell Ap Wall. Violation
0039	77-10	u	M	-	XIII	-	BA	Pipe Suppt Cart. Not Signed
0040	77-10	u	M	-	VII <sup>*</sup> cannot elucidant	x	-	Unauthorized Design Change
0041	77-11	u	M	-	VII <sup>*</sup>	x	-	Design Change Procedure Imple
0042	77-11	u	M	-	III <sup>*</sup>	-	BA	cat 1 Bid.
0043	77-11	u	QA	-	III <sup>*</sup>	x	-	Separation Re Component
0044	77-13	u	C	-	III <sup>**</sup>	x	BA	Documentation Storage/Maint
0045	77-13	u	M	-	X <sup>*</sup> , XVII <sup>*</sup>	-	BA	Procedure
0046	78-04	u	M & E	-	XIII	-	BA	ven for Docu
0047	78-05	u	QA	-	VII, XVII <sup>modified</sup>	x	BA	ation Not Avail
0048	78-05	V	M	-	X, V	-	BA	Failed Follow Fab Procedure
0049	78-07	D	C	-	XI	-	BA	

Proj #	RPT No	Type Item	Disc/ Area	Criteria Violated	Criteria Unresolved	Charge Directly To App Contractor
0050	78-07	U	E	-	V *	- BR Elect Equip Storage
0051	78-07	U	QA	-	II, VII *	x All Vendors Control of All Vendors
0052	78-08	V	Env.	V	-	x - -
0053	78-09	U	C	-	XI *	- BR Reactivity of Sand
0054	78-11	V	M	Y	-	- BR Failure to Follow Cleanliness Proc.
0055	78-12	V	M	IX; V	-	- BR Failed TO Weld per Procedure
0056	78-12	U	M & E	-	X, V *	- BR AWS Reg. NOT in Weld Procedure
0057	78-12	V	E	XV	-	- BR Failure to Joint Segregate Equip
0058	78-12	U	C	-	V *	- BR Coating Procedure
0059	78-13	V	M	IX, X	-	- BR Failure to Monitor Weld Procedure
0060	78-13	V	C	XI, V	-	- BR Failure to Follow Concrete Test Proc
0061	78-13	U	M	-	VII, X *	x BR West. Material Certs NOT Available
0062	78-16	V	ALL	10 CFR 50.55(e)	-	x Failure to Report
0063	78-16	D	C	XI	-	- BR Failure to Comply with R.C. 110
0064	78-18	U	QA	-	VI *	- BR Draw Out of Date
0065	78-18	V	M	IX	-	- BR Failed To Follow Weld Procedure
0066	78-20	D	M	IX, VII	-	x Vendor Radiographs unacceptable
0067	78-21	U	M	-	VII *	x Seismic Qual of Value
0068	79-03	V	C	V	-	- BR Failed to Follow Concrete Recd.
0069	79-04	V	M	XIII, V	-	- BR Failed to Follow Equip Maintenance
0070	79-04	D	E	V, III	App A	x BR Separation Criteria Violated
0071	79-04	U	C	-	III	- BR Concrete Mix Design Records No.
0072	79-06	U	E	-	III *	x QC of Non-safety Seismic Supp.
0073	79-06	V	E	X; V	-	- BR QC procedures for Cable Tray Not followed
0074	79-07	U	M	-	III *	x BR Unit 2 Vessel Misoriented 44°
0075	79-07	U	M	-	VII	x Vendors Design of IFT
0076	79-08	U	M	-	VII	x Vendors Grind Pipe Bands
0077	79-11	V	C/QA	II	-	x Vendors Math Certs for Pressurizing Values
0078	79-18	V	M	XII, IX	-	- BR QA Pgm for Civil Not Implemented
0079	79-18		E	X	-	- BR Calibration of Weld Machines
						- BR QC Personnel Not Trained

Track	Rpt No	Type Item	Disc./ Area	Criteria Violated	Criteria Unresolved		
0080	79-18	V	QA	X, XVII	-	-	BA Impediment, Not Documented
0081	79-18	V	QA	X	-	-	BA QC Stamp, Not Control
0082	79-18	U	QA/E	V	-	-	BA Traveler Lacked Instructions
0083	79-19	V	QA	X	-	-	BA QC Failed To Red Tag/Segregate Equip
0084	79-19	V	E	VIII, XIII?	-	-	BA IE Cable Coded
0085	79-23	U	M	-	X*, V*	-	BA Deteriorating
0086	79-23	U	ALL	-	V →	-	BA No Procedure To Def. Traveler Syst for Con Redundant? done for Traveler - null
0087	79-23	U	C	-	X	-	BA Concrete Inspection Questioned By Allegor
0088	79-24	U	M/E	-	IX*, XIII*	-	BA Protect Equip. Etc
0089	79-25	U	E	-	V*, II*	-	BA During Welding Cable Installation
0090	79-27	V	M/E	V, XIII	-	-	BA No Procedure for Handling Component
0091	79	V	QA SU.SS(e)	V	-	-	BA Obsolete QA Procd
0092	79-27	U	M	-	III* (188A)	X	-
3	79-28	V	M/E	V; X	- →	-	BA Hanger Class 5 Conflict FSAR vs Pw Traveler did not Reference AE/Kerst Pw
0094	79-28	U	M	-	V; XI	X	-
0095	79-28	U	E	-	XI	X	-
0096	79-31	V	M	IX	-	-	BA Pre-service Procedure To Require NOE RPT TO EQ Approval. of Bur
0097	80-01	U	E	-	VII	X	BA Repair Renovation by A Improper Weld Rod Used
0098	80-01	U	M	-	III*	-	BA AE Review of EQ Test Rpt Not Appropen
0099	80-01	V	E	X	-	-	BA B/R Mod of Pipe Diviates from FSAR
0100	80-03	V	E	V	-	-	BA QC accepted Bad Welding Battery Lack
0101	80-03	U	M	-	VII	X	-
0102	80-08	V	E	V, XV	-	-	BA Cables Not Properly Pulled
0103	80-08	V	ALL	10CFR SU.SS(e)	-	X	-
0104	80-08	U	E	-	VII*, XI*, XVII*	X	-
0105	80-08	U	E	-	V	-	BA Vendor Did not Proper Heat Treat Valve Disc
6	80-09	V	Env	V	-	X	-
0107	80-11	V	M	XIII	-	-	BA Damage To Cable Pulled Not Reported
0108	80-13	V	M	IX	-	-	BA Failure To Report Concrete Joid in Wall
0109	80-13	V	E	X	-	-	BA No Evidence of Rocking Test of Cable

Impediment, Not Documented

QC Stamp, Not Control

Traveler Lacked Instructions

QC Failed To Red Tag/Segregate Equip

IE Cable Coded

Deteriorating

No Procedure To Def. Traveler Syst for Con Redundant? done for Traveler - null

Concrete Inspection Questioned By Allegor

Protect Equip. Etc

During Welding Cable Installation

No Procedure for Handling Component

Obsolete QA Procd

Hanger Class 5

Conflict FSAR vs Pw

Traveler did not Reference AE/Kerst Pw

Pre-service Procedure To Require NOE RPT TO EQ Approval. of Bur

Repair Renovation by A

Improper Weld Rod Used

AE Review of EQ Test Rpt Not Appropen

B/R Mod of Pipe Diviates from FSAR

QC accepted Bad Welding Battery Lack

Cables Not Properly Pulled

Vendor Did not Proper Heat Treat Valve Disc

Damage To Cable Pulled Not Reported

Failure To Report Concrete Joid in Wall

No Evidence of Rocking Test of Cable

Cable Repair Procedure Not Clear

Withdrawal Ground Water

Safety Injection Flange Mishandled

Wrong Weld Process Used

Failed to Inspect Cable Terminations



Item	Rpt No	Type Item	Disc/ Area	Criteria Violated	Criteria Unresolved	Charge Directly To		
						App	Contractor	
0110	80-15	V	QA M	II III	-	X	BR	2500 Hangers not eval for impact on safety syst. Supp fab w/o Tolerances
0111	80-15	V	M	V	-	-	BR	Inspection Record Do not show final inspect
0112	80-15	U	QA	-	X	-	BR	Pipe Weld Prep Not Per Design
0113	80-17	V	M	IX, III	-	-	BR	3rd Failure to Rpt
0114	80-17	V	M	10CFR50.55C	-	X	-	No Weld Return on Beam Seat Clips To Column
0115	80-18	U	M	-	IX	-	BR	Anchor Bolt Installation To meet Design Loads
0116	80-18	U	C	-	III	X	BR	NDE/Weld Interpretation By CB & I Unacceptable
0117	80-20	V	M	IV	-	-	BR	Pressurizer Valve M. located.
0118	80-20	V	M	V	-	-	BR	Cable Separation of Non/safety Cable
0119	80-20	U	E	-	III	-	BR	Storage of Fuel Racks
0120	80-20	U	M	-	XIII	-	BR	Pipe Whip Restraints
0121	80-23	V	M	IX	-	-	BR	Weld Not Full Penetration
0122	80-23	U	M	-	IX*	-	BR	Hold Points Not on Weld Data Card - Travel
0123	80-27	U	E	-	VII*, XI*, XVII*	X	-	Vendor Qual Elect Cable
0124	80-02	V	M	IX	-	-	BR	Unauthorized Tack Weld To Valve Body
0125	81-05	U	C	-	III	-	BR	Epoxy Grout Strength At High Temp
0126	81-05	U	M	-	III, VII*	-	BR	Diesel Generator mtgcs Vendor AISC vs ASME G
0127	81-05	U	M	-	IX*	-	BR	NDE Technique RT Unacceptable
0128	81-02	U	C	-	III*	-	BR	(P6-) Depth of Anchor Bolts Into Concrete
0129	81-10	U	E	-	V*	X	-	Post Turnover of Equipment to Ops
0130	81-11	U	M	-	XIII*	-	BR	Improper Handling of Pump Casings
0131	81-13	U	M	-	IV*	X	BR	As built Parg. (P4) Procedure Revised to Cont
0132	81-13	U	M	-	X*	X	BR	Design vs As Built Hanger/Supp. D. Flare
0133	81-14	U	M	-	IX*	-	BR	multiple Repair of Stainless Weld w/o Appra
0134	81-15	V	M/C	X, XVII	-	-	BR	Coat Records, mix Steel
0135	81-15	U	QA	-	VIII*	X	-	Cable Supp Nonexistent; No TUGCO Audit of Contin
0136	81-16	U	C/M/E	-	III**	X	-	Failure consider Reg. A Reg. i.e. failure non-saf. on Safe
0137	81-19	U	M	-	III*	-	BR	Design Spec. Mat. The latest Revision
0138	81-19	U	M	-	X** III**	-	BR	Design Change Modification Not Inspected
0139	82-01	U	QA	-	III*	X	BR	ASME Reg. Per FSAR Deleted By Spec.



N	RPT No	Type Item	Discipl /Area	Criteria Violated	Criteria Unresolved	Charge Directly To App Contractor	Investigator	Applicant Analysis Resulted in Mod.
				Criteria Violated	Criteria Unresolved	Charge Directly To App Contractor		
0140	82-01	u	E	-	V *	-	BR	Instrument Procedures w/o Detailed Instructions
0141	82-01	u	E	-	V ?	-	BR	Cable Pull over Sheig Band Radius
0142	82-03	v	M	-	VII	-	SW	SW Fab Pipe Centerline Not Marked
0143	82-09	u	M	-	XVII *	-	Vendor	Vendor Document w/o Obj. Evidence Test Results
0144	82-05	u	M	-	VII, XI	-	-	Design Calc. Error
0145	82-11	v	M	-	III	*	-	Note: Raised to viol. later
0146	82-10	u	M	-	X	-	BR	Inspection Polar Crane Shams
0147	82-11	v	M	II, IX	VII *	-	CBT	Vendor QA/Inspection Problems - Pipe Whip Restrain
0148	82-11	u	M	-	X, III	-	BR	NDE Level II Not Trained
0149	82-19	u	M	-	X, III	-	BR	Design of Piping - As Built Inspection
0150	82-09	u	M	-	X, III	-	Vendor	As Welds on Vendor Panel
0151	82-14	u	M	-	X, V	-	Vendor	NDE Certs / Data Changes
0152	82-11	v	M	X	-	-	BR	No Procedure for Inspection of Stacked Welds
0153	82-22	u	M	-	XVII *	-	BR	NDE Material Cert Not Inspected
0154	82-22	u	M	-	XVII, X	*	-	Audits Pgm Breakdown
0155	82-30	v	M	III	-	-	BR	Deficient Inspection of Deficient NPST Hardware
0156	82-25	v	M	II	-	-	BR	Design Review of JTT Grind / Nuc Pow Sys Trade
0157	82-25	v	ALL	XVIII	-	*	BR	Inspection Certification
0158	82-26	u	M	-	III *	x	-	TUGCO Audits of NPS
0159	82-26	u	M	-	XI	*	-	Inadequate Design for Anchor Bolts
0160	82-26	u	M	-	III	x	BR	Inadequate Richmond Inboard Test Data
0161	82-26	u	M	-	III	x	-	Questioned RTR TO Review
0162	82-26	u	M	-	III	x	-	Modifications, Stability of Spring
0163	82-26	u	M	-	III	x	-	Design / Construction Local Pipe Stress
0164	82-26	u	M	-	III	x	-	Acceptability Correction of CC-2-068-709-1943
0165	82-26	u	M	-	III	x	-	Appl. Design Reviews Pipe / Supps For NKE
0166	83-03	v	M/E	II	-	x	-	Stress Analysis
0167	83-07	v	M	IX	-	-	-	Failure To Properly Classify Lights
0168	83-07	u	C	-	V	-	BR	Weld Gap Tol. Exceeded
0169	83-07	u	C	-	X *	-	BR	Coating Procedures Per Mfg. - Adh. Test
							BR	Coating Cure Time

Violation for same

Violation for same

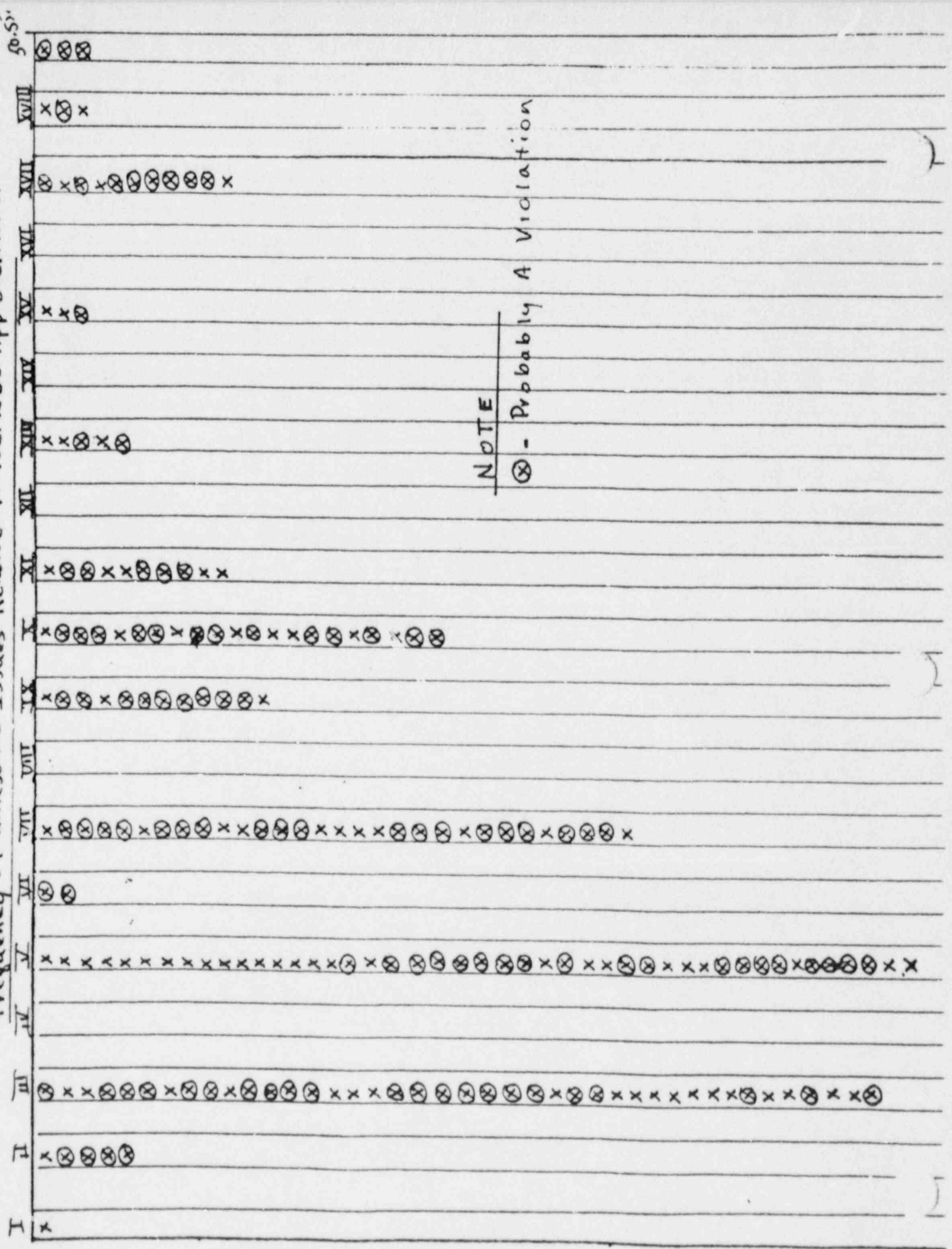
IR 82-10 Investigator 50.55e

\* Upgraded to viol

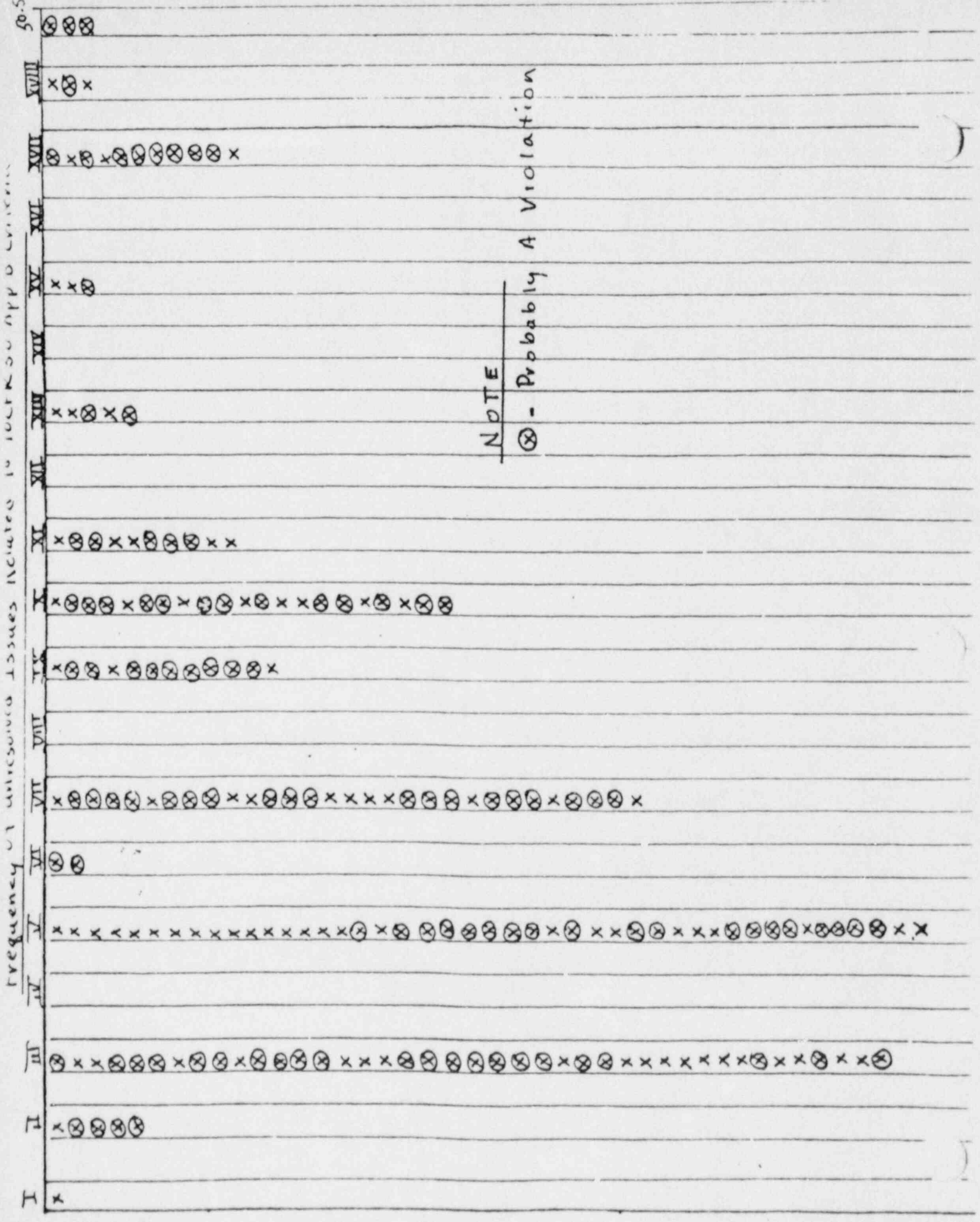
NY	RPT No	TYPE Item	Disc Area	Criteria Violated	Criteria Unresolved	Charge Directly TO #88 Contractor	Subject
0170	83-15	V	M	IX	-	-	BR NDE - Box Metal Repair
0171	83-15	V	M	IX	-	-	BR NDE - Film Density
0172	83-15	U	M	-	IX <sup>+</sup> , XVII <sup>+</sup>	-	BR NDE - RT Records
0173	83-15	U	M	-	IX <sup>+</sup> , II <sup>+</sup> , V <sup>+</sup>	-	BR NDE - Preserv./NDE Proc
0174	83-15	U	M	-	IX <sup>+</sup> , XVII <sup>+</sup>	-	BR NDE - Level III Cont.
0175	83-15	U	M	-	IX <sup>+</sup> , VII <sup>+</sup>	-	Vendor Borg Warner RT Unacc
0176	83-23	V	M	III	-	-	BR As Built - Ins g. Unacc
0177	83-23	V	M	X	-	-	BR Ins g./Install Jam Nuts
0178	83-23	U	E	-	V <sup>**</sup>	-	BR QA Records Review w/o Pr
0179	83-23	U	C	-	V <sup>**</sup>	-	BR Install Anchor Bolts Exceed?
0180	83-23	U	QA	-	V <sup>**</sup>	-	BR Turnover Punchlist w/o Pro
0181	83-2	U	QA	-	XVIII	X	- Audit Result Not Repor
0182	83-24	U	E	-	V <sup>?</sup>	-	BR Cable Splices IEEE-420 Interpretation
0183	83-24	V	M	V, III, X	-	-	BR HUPAC ; as Built; Ins g. U
0184	83-24	U	M	-	V <sup>*</sup>	-	BR Bolt/Nut Tighten Req.
0185	83-24	V	M	VI, III <sup>?</sup>	-	-	BR Obsolete Dwg In Field Unaccept Dwg - Incompl
0186	83-24	V	M/E	XVII	-	-	BR Storage Elec/Mech Equip
0187	83-25	U	E	-	III	-	BR Conduit To Close To FL-Light
0188	83-47	U	C	-	VII, <sup>**</sup>	-	BR Improper/Damage & Corrosion West. Comp - Effect ES
0189	84-08	V	M	V <sup>+</sup> X	-	-	BR Polar Crane Gaps
0190	84-08	V	M	X	-	-	BR Inspection Main Loop X-Over Legs
0191	84-08	D	M	III	-	X	BR Design Info For Inst. Struct Steel Ignored
0192	84-08	U	M	-	IX	-	BR Tack weld Polar Crane Connection Questioned
0193	84-10	U	M	-	V <sup>+</sup> , III <sup>+</sup>	-	BR Fire Door Rating 3 Hr But Tubing Thru Door
0194	84-16	V	E	I, V	-	-	BR Improper Inspection Install Cable Tray Along
0195	84-16	V	M	III	-	-	BR Design Documents Not Controlled
0196	84-16	U	C	-	III	-	BR Change from Concrete To Grout Questioned
0197	84-16	U	M	-	VII <sup>**</sup>	-	Vendor Hydrogen Recombiner outside Specified Volts
0198	84-22	V	E	V	-	-	BR Failure To Maintain Posit Press on Elect Penetration
0199	84-23	V	ALL	10 CFR 50.55e	-	X	- Failure To Report Defic

Y J	RPT NO	Item TYPE	Disc/ Area	Criteria Violated	Criteria Unresol	Change Directly To App Contractor	Subject
200	84-22	V	C/E/m	III	-	-	BR Bisco Remediation Seals Violated / Broken - As Built
201	84-22	V	M	III, V, X	-	-	BR Safety Inject Support not Installed / Inspected - As Built
202	84-22	U	C/m/E	-	VII, XVII	-	BISCO Material Cert Not specific As To Reg. MET
203	84-22	U	MYE	-	III	X	- Battery Room Design - Hyg
204	84-26	V		II, V	-	-	BR Inspection Criteria was not Provided
0205	84-26	V	E	X	-	-	BR Inspection of Cable Trays Inadequate
0206	84-26	U	E	-	III **	-	BR Field Instrument Sheets Int
0207	84-29		M	IX	-	-	BR Only Marked As Built
0208	84-34	V	M	X, II	-	-	BR Violated
0209	84-34	V		10 CFR 50.55(e)	-	X	- Inadequate Installation
0209	84-34	V		10 CFR 50.55(e)	-	X	- Inspection Snubber Swings Failure To Rpt Constr Defic
0210	84-40					X	- Construct Deficiency True
0211	84-40	U	ALL		10 CFR 50.55(e)	X	- No Improperly Assigned
0212	84-44	U	FP	-	V **	X	- Evaluation of RTR Delta Not In File
0213	84-44	U	FP	-	V **	X	- Fire Protection Procedures Deficient
0214	84-44	U	FP	-	V	X	- Surv/Test Procedures Conflict with Tech Spec / No Init. Rev
0215	84-44	U	FP	-	III	X	- Fire Pump Capacity - Pert Not Not In Procedure
0216	84-44	U	FP	-	III	X	- Emergency Lighting Inadequate
0217	84-44	U	FP	-	VI	X	- Pressurizer Transformer
0218	84-44	U	FP	-	III **	X	- Fire Protection Question
0219	84-44	U	FP	-	V	X	- Fire Control Panel Not List
0220							- Approved By National Lab
0221							- Sprinkler As Installed
0222							- violates NFPA 13
0223							- Applicant Appendix K Plan Incomplete
0224							
0225							
0226							
0227							
0228							

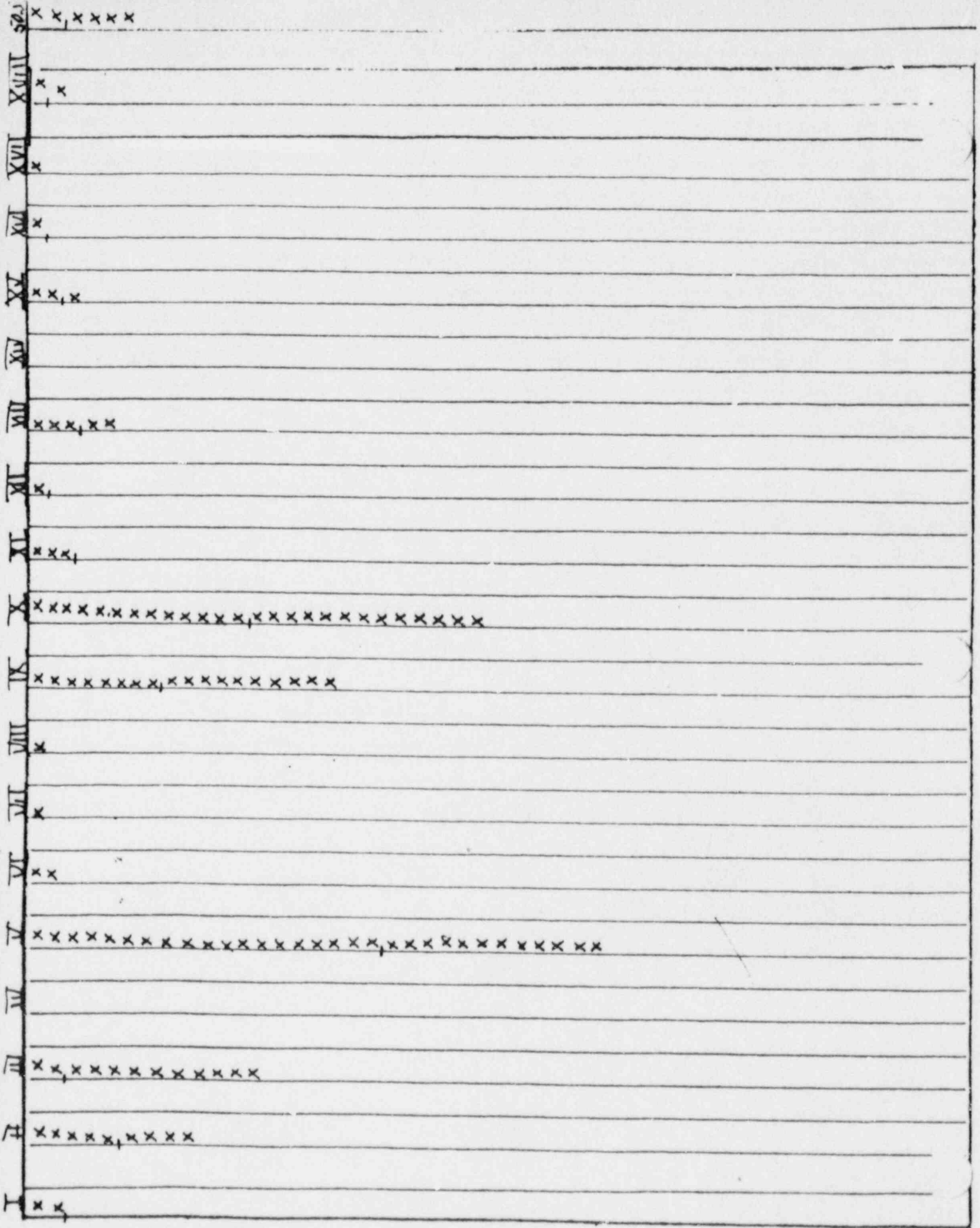
Frequency of Unresolved Issues Related To 10CFR 50 App B Criteria

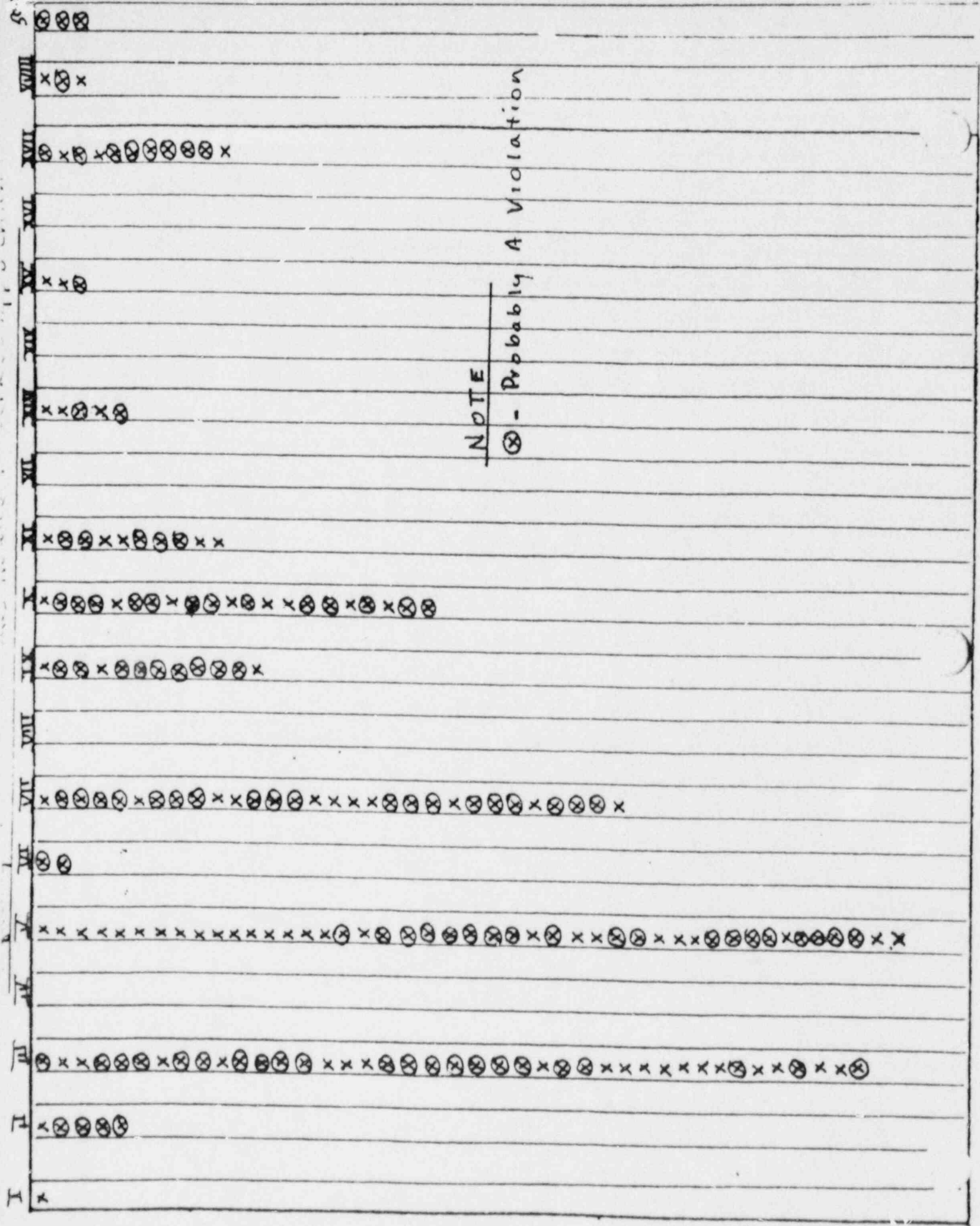


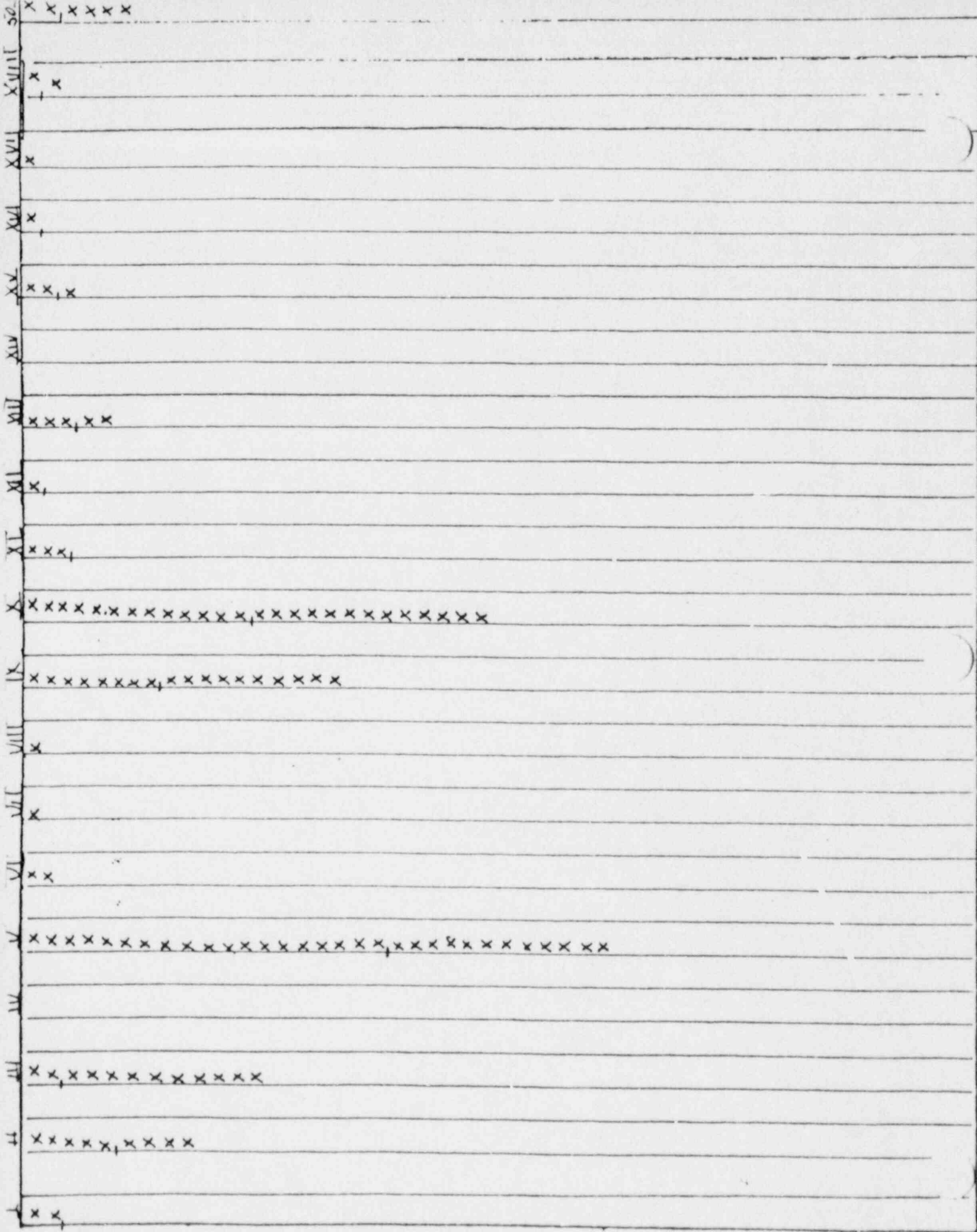












LICBY

18 APR 83

Please send a copy of BN 83-29 B-

To: Paul Tam ETEC

- 56, 56B - 21A

✓ J. Rajan MEB.

- the dist sheet

✓ J. Topia Region IV

✓ J. Westerman Region IV

✓ G. Madison Region IV

~~R. Taylor - Pacific Region~~

✓ A. Grammer - MEB

✓ R. Borch - MEB

✓ All copies should include copies.  
 of the Staff Board Order with the  
 above indication.

done  
 29  
 4/18

FOIA-87-847

B/16

CPP-12,272

TEXAS UTILITIES SERVICES INC.

(DIL)

OFFICE MEMORANDUM

To [REDACTED] - Project Civil Engineer Glen Rose, Texas May 26, 1983

Subject COMANCHE PEAK STEAM ELECTRIC STATION  
NCR-M-82-1589, WELD CRACKS

The subject NCR denoted four welds rejected for cracks. I have evaluated these welds with the following results:

1. D-157, Weld 48 - Crack in weld approximately 4 inches long. This weld appears to have cracked during bolting fabrication and is being evaluated by G & H, New York.
2. D-153-1, Weld 23 - Crack from base metal at toe of weld propagating into the weld. The crack was originally reported as 3 1/2" in length; further evaluation revealed a total length of approximately 8".
3. D-138-1-D, Weld 221 - No evidence or crack indication.
4. D-140-A (West), Weld 23 - Cracked tack weld not evaluated. Tack should not have any effect on the structural integrity of the component.

If you require any additional information, please advise.

*RCB*

R.C. Barber  
Weld Engineer

RCB/sgr

cc: M.R. McBay  
E.L. Bezkor  
R.E. Ballard

FOIA-87-847  
B/17





UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
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2-2  
app. C.

TRANSMITTAL SHEET - REGION IV

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MESSAGE FROM: H. Shannon Phillips

CONTACT: \_\_\_\_\_

SPECIAL INSTRUCTIONS: Please Contact me when received.

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4-16-87

Memorandum For: Philip F. McKee  
Office of Special Projects

From: H. Shannon Phillip,  
Senior Resident Inspector  
Comanche Peak Construction

Subject: Licensing Board Inquiry  
On Draft Staff Reports  
About Comanche Peak QA/QC

I am aware of a large number of draft reports, and memoranda concerning the Comanche Peak QA/QC program. I have never been asked to provide such information until April 1, 1987. At that time I provided all materials I had regarding the trend analysis dropped from report 85-07/05 and other related material in the site file.

The licensing board's latest request is much broader. I am providing a list of draft reports and related documents. If the Board wants copies of these

documents it will take some time  
to assemble and copy them.

H. Shannon Phillip,

1. Draft Report 84-32/11 - This documents an inspection at Texas Utilities Electric (TUE) in August and September 1984. A review of the management of the QA program showed that TUE management did not adequately review the status and adequacy of the QA program. The audit program was deficient.
2. Draft Reports 85-14/11 - These draft reports document serious deficiencies in QA control of records and facilities where record are preserved.

There were serious disagreements between Westerman, Barnes, Hale and the inspector making the finding T. Young. Phillips agreed with Young's findings. As a result Phillips retained copies of several drafts and sent a memo with copies to the Region IV docket file.

3. Draft Reports 85-16/13 - These draft reports document serious deficiencies in the TUE system for reporting and documenting 50.55(e) deficiencies in design, construction and QA.

There were serious disagreements between Westerman and Barnes and the inspector's (Joseph McCleskey) findings. Phillips documented the findings and they differed with with the draft reports. As a result Phillips forwarded copies to the RII docket file as required by Regional Policy Guide.

4. Draft Report 86-03/02 - This documents a breakdown in the Brown & Root audit program on site from 1980 to 1986. It also appears that the program was deficient from 1978 to 1980.

Westerman directed Phillips to write this as unresolved. This report which essentially reflects a clear cut violation was classified as unresolved.

Note: This report for February 1986 for construction was omitted and was included in 86-06/04 because the inspection period was changed from February to February - March 1986. Also management directions changed.



5. Draft Reports 86-08/06. These draft reports reflect inspections which go all the way back to 86-03/02. The single violation took more than a year to issue.

Report 86-08/06 was issued on March 30, 1986. I was going to purge my files but will keep all material concerning draft reports.

These reports document a breakdown in the OA program with respect to the audits of site activities from 1980 to 1986.

6. Review of Region IV Systematic Assessment of Licensee Performance (SALP) Versus IE Assessment of Region IV Performance

This information was provided to OIA concerning Region IV performance. It also shows a flawed SALP program.

7. Site File, On Trend Analyses - This file was furnished to OIA during the recent investigation that Region IV made a material false statement to the licensing board concerning the trend report dropped from 85-07/05. Other material in trend analysis files were provided.

8. Correspondence about the above QA/QC matters in these drafts include memoranda, letters, and notes.

Friday morning, August 3, 1984

# Identifying informant is 'policy'

By BRUCE MILLAR  
Star-Telegram Writer

A federal inspector said he was following an unwritten "common-sense policy" when he told a manager at Comanche Peak nuclear power plant the name of an informant two years ago, according to a sworn statement.

Robert G. Taylor, former resident inspector for the U.S. Nuclear Regulatory Commission at Comanche Peak, said it is NRC policy to protect the names of informants only as long as they work at the plant.

Once employees are fired or terminated, the guarantee of confidentiality is lifted, he said in the statement that he made in preparation for hearings on allegations of intimidation and harassment of plant inspectors.

The day after the firing of quality control inspector Charles A. Atchison of Azle, Taylor identified him to Ron Tolson, who was manager of the on-site quality control program for Texas Utilities Generating Co. The company is the primary owner of the plant.

Taylor's breach of confidentiality is apparently not a violation of NRC policy, Dick DeYoung, director of inspection and enforcement in the NRC's Washington headquarters, said Thursday.

In a statement released through a spokesman, DeYoung said, "Our policy is not to disclose the names of whistle-blowers. Period."

Taylor said in his statement that Atchison was the only "whistle-blower" whose name he divulged to plant officials. Taylor decided to name Atchison because he sensed a "lack of sincerity" on Atchison's part, the statement said.

An NRC internal report released in March said Taylor revealed Atchison's identity to a plant official by saying, "There goes your 1980 al-leger." The report released by the NRC had names blacked out, but the

names were obtained from other sources.

In the sworn statement he made July 17, Taylor was unsure of his exact words.

"I identified Mr. Atchison to the utility — precise words not recollected — on the 13th of April (1982)," the statement said.

Atchison was fired April 12, 1982. He lost his job after a Texas Utilities supervisor criticized him for reporting welding deficiencies and for faulting training programs outside of his immediate area of responsibility.

Atchison has sued his former employer, Brown & Root, the general contractor for the plant, claiming that his dismissal has resulted in his blackballing in the nuclear power industry.

Paul Check, deputy administrator of the NRC regional office in Arlington, declined to comment on Taylor's sworn statement. He said he would feel out of place commenting on a statement prepared for U.S. Atomic Safety and Licensing Board hearings.

The board is scheduled to start hearings Aug. 27 in Fort Worth on allegations that plant management harassed and intimidated inspectors to keep them from doing their jobs.

The plant is under construction near Glen Rose, about 45 miles southwest of Fort Worth.

Juanita Ellis, leader of Citizens As-

sociation for Sound Energy, a Dallas-based group opposed to the plant, said she was shocked by Taylor's description of NRC policy.

"The implications are tremendous. It would encourage the utility to fire those people they thought were whistle-blowers," she said.

She said Taylor's "common-sense policy" encourages the very practices that confidentiality is supposed to help prevent. It discourages workers from coming forward and heightens fears about blacklisting.

Although Taylor was removed from his Comanche Peak post in January, he is still assigned to the Arlington regional office of the NRC.

He earns \$51,500 a year as a reactor inspector for the Wolf Creek nuclear power plant in Kansas. NRC officials in Arlington have said that his reassignment was a lateral transfer.