

~~SENSITIVE ALLEGATION MATERIAL~~

RIII-2002-A-0005

Concern 1 (concern 3 in 03/12/02 memo from MEB to EICS, and 03/19/02 memo from DB to EICS; previously identified by DNMI) : A spent-fuel storage-cask fabricator, US Tool & Die, violated Quality Assurance Program "Design Control" requirements, in that, they dispositioned manufacturing discrepancies as Use-As-Is, Repair, or Rework without authorization, or review and approval of the cask designer, Holtec International or Exelon.

Assigned division/branch: NMSS/SFPO. This concern was transferred to NMSS on 02/20/02. DNMS's review identified that the CI clarified that the issue involved Exelon as well as Holtec. This information will be referred to the SFPO.

Concern 2 (concern 4 in MEB's 03/12/02 memo to EICS, previously identified by DNMS; a 02/04/02 ARB determined that the concern should be referred to DRS) : ComEd's Quality Assurance Program requirements were violated in November 1997, in that, the Stop-Work Order against GE Nuclear Energy was lifted without verifying that corrective actions had been implemented.

Assigned Division/Branch: DRS/MEB

Concern 3 (concern 5 in MEB's 03/12/02 memo to EICS, previously identified by DNMS; a 02/04/02 ARB determined that the concern should be referred to DRS): ComEd's Quality Assurance Program requirements were violated from August 1997 through November 1997, in that, during the Stop-Work Order against GE Nuclear Energy, engineering services were obtained, but approximately 17 associated Procurement Plans were not performed. A specific example relates to an engineering evaluation by GE Nuclear Energy of a discrepancy in the minimum required pressure (800 psig versus 940 psig) for the Control Rod Drive Hydraulic Control Scram Accumulators at Dresden and Quad Cities.

Assigned division/branch: DRS/MEB.

Concern 4 (concern 6 in MEB's 03/12/02 memo to EICS; previously identified by DNMS; a 02/04/02 ARB determined that the concern should be transferred to DRS) :Quality Assurance departments should not report to the president of Nuclear Generation, YYY, because of his lack of independence from production.

Assigned division/branch: DRS/MEB.

Concern 5 (Concern 7 in MEB's 03/12/02 memo to EICS; previously identified by DNMS; a 02/04/02 ARB determined that the concern should be transferred to DRS: The manager of Supplier Evaluation Services Group, ZZZ, is only concerned about keeping his job and not concerned about the quality of the QA audits his organization performs.

Assigned Division/Branch: DRS/MEB

Concern 6 (Concern 8 in MEB's 03/12/02 memo to EICS and concern 1 in DB's 03/19/02 memo to EICS. A 02/04/02 ARB determined that the concern should be transferred to DRS): ComEd's Quality Assurance Program requirements were violated from November 1997 through May 1999, in that, GE Nuclear Energy never issued the required monthly status updates of their corrective actions related to findings that led to the August 1997 Stop-Work Order. Monthly updates were also not provided for open findings regarding Holtec in 2000.

Concern 7: Four employees (XXX, WWW, VVV, UUU) were discriminated against for supporting a QA "stop work."

Assigned division/Branch: DNMS/DB. This concern was closed in a 02/06/02 letter to the CI.

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Concern 8 (concern 9 in MEB's 03/19/02 memo to EICS; previously identified by DNMS)
Adequate QA/QC oversight was not provided by the spent fuel storage cask design organization over the spent fuel storage cask fabricator, which resulted in indeterminate quality and structural integrity of the casks. A specific example indicated that the disposition of nonconformance conditions by the fabricator as "use-as-is," "rework," and "repair" violated the QA program design controls specified in 10 CFR 71 and 10 CFR 72, in that, acceptance of these nonconformances were equivalent to design changes which needed the design organization's approval.

Assigned division/Branch: NMSS/SFPO. This concern was transferred to SFPO on 02/20/02.

Concern 9 (concern 10 in MEB's 03/19/02 memo to EICS; previously identified by DNMS; A 02/04/02 ARB determined that the concern should be transferred to DRS) : The seismic qualification of certain valves and the associated piping systems is invalid because valve manufacturers assumed that the valves were rigid; however, this assumption had been shown to be incorrect for specific motor operated valves in the Generic Letter 89-10 program. This potentially affects the calculated natural frequencies of piping used in seismic analyses and would apply to all valves and valve types that were not included in the Generic Letter 89-10 program.

Assigned division/Branch: DRS/MEB

concern 10 (previously identified by DNMS): The licensee attempted to hide a report of an audit of U. S. Tool & Die from an NRC inspector who had requested a copy of the report to support the NRC inspection process.

Assigned division/Branch: DNMS/DB. This concern will be closed in the next status letter to the CI.

Concern 11 (concern 11 in MEB's 03/19/02 memo and concern 2 in DNMS's 03/12/02 memo; this is a new concern): ComEd did not investigate an issue from a Zion audit in August 1995 (SQV Audit File 22-95-05), to ensure that a similar issue did not apply to older vintage plants, such as Dresden and Quad Cities. The audit issue related to valves that were originally purchased as non-safety-related (or commercial grade), were upgraded to safety-related without performing any calculations, and were subsequently modified based on engineering judgment with no documentation. The modifications involved reduction in the thickness of the valve body or bonnet.

Assigned division/ Branch: DRS/MEB

Concern 12 (concern 12 in MEB's 03/12/02 memo; this is a new concern): ComEd's Quality Assurance Program requirements were violated, in that, ComEd did not perform "owner's reviews" of all design analyses provided by architect/engineers, NSSS vendors, etc. These ongoing reviews were required to address a 1998 Level 1 audit finding, which related to "control of purchased items, components, and services." This issue would also apply to the documents sent in by Holtec that dispositioned discrepancies for the dry-cask-storage project..

Assigned division/branch: DRS/MEB.