

**Concern 3:** 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. If substantiated, this would constitute a violation of 10 CFR Part 50, Appendix B, Criterion III, Design Control, in that, design changes, including field changes, were not subject to design control measures commensurate with those applied to the original design and were not approved by the original or other applicant-designated design organization. This also demonstrated a lack of QA/QC oversight by Holtec, which, if substantiated, would be a violation of 10 CFR Part 50, Appendix B, Criterion VII, Control of Purchased Material, Equipment, and Services, in that, the effectiveness of a contractor's control of quality was not assessed at an interval consistent with the importance of the services.

**Recommendation:** This concern is currently documented as Concern 1 for RIII-A-2002-0005, and according to J. Heller's memorandum of February 20, 2002, will be transferred to NMSS spent fuel office. Regional followup activities beyond those currently planned are not needed.

**Concern 4:** 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. If substantiated, this would constitute a violation of 10 CFR Part 50, Appendix B, Criterion VII, Control of Purchased Material, Equipment, and Services, in that, the effectiveness of a contractor's control of quality was not assessed at an interval consistent with the importance of the services.

**Recommendation:** This concern is currently documented as Concern 2 for RIII-A-2002-0005. This concern should be referred to the licensee for their evaluation. The licensee should identify what actions were taken to lift the Stop-Work Order from GE Nuclear Energy in November 1997.

**Concern 5:** 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. If substantiated, this would constitute a violation of 10 CFR Part 50, Appendix B, Criterion III, Design Control, in that, the adequacy of design analyses were not verified and checked as required.

**Recommendation:** This concern is currently documented as Concern 3 for RIII-A-2002-0005. This concern should be referred to the licensee for their evaluation. The licensee should identify what work products or services were obtained during the 1997 Stop-Work Order from GE Nuclear Energy, and for any identified, show what Procurement Plans were implemented and how they were accomplished.

**Concern 6:** Quality Assurance departments should not report to the president of Nuclear Generation, Oliver Kingsley, because of his lack of independence from production.

**Recommendation:** This concern is somewhat documented as Concern 4 for RIII-A-2002-0005. This concern should be referred to the licensee for their evaluation and included with Concern 2 above, relating to the QA organization. The licensee should explain why the organization, with QA reporting to Kingsley, provides independence from cost and

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schedule.

**Concern 7:** The manager of Supplier Evaluation Services Group, Mr. Bastyr, is only concerned about keeping his job and not concerned about the quality of the QA audits his organization performs.

**Recommendation:** This concern is somewhat documented as Concern 5 for RIII-A-2002-0005 which stated that the head of the Supplier Evaluation Group was not qualified (based on education or experience) for this position. The focus of the CI's concern appears to be the quality of the audits and the education and experience aspect were brought up only in the context that the manager was unable to determine significance. If the manager had more experience and education, the concern would still exist relative to the quality of the audits. This concern should be referred to the licensee for their evaluation.

**Concern 8:** 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. If substantiated, this would constitute a violation of 10 CFR Part 50, Appendix B, Criterion V, Instructions, Procedures, and Drawings, in that, activities affecting quality were not accomplished in accordance with prescribed procedures.

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**Recommendation:** This concern is currently documented as Concern 6 for RIII-A-2002-0005. This concern should be referred to the licensee for their evaluation. The licensee should determine if monthly updates were issued as required by GE Nuclear Energy, and provide the bases for their conclusions.

**Concern 9:** 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.

**Recommendation:** This concern is currently documented as Concern 8 for RIII-A-2002-0005. According to J. Heller's memorandum of February 20, 2002, this concern will be transferred to NMSS spent fuel office. Regional followup activities beyond those currently planned are not needed.

**Concern 10:** 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. If substantiated, this would constitute a violation of 10 CFR Part 50, Appendix B, Criterion III, in that, the adequacy of stress analyses were not verified and checked as required.

**Recommendation:** This concern is currently documented as Concern 9 for RIII-A-2002-0005. This concern should be referred to the licensee for their evaluation. The licensee should, for valves which were not included in the Generic Letter 89-10 program, determine if valves were not rigid as assumed in pipe stress analyses, and if so, determine the significance and

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