

I.15

From: Bruce Jorgensen, R3  
To: Paul Narbut  
Date: 1/24/02 5:24 PM  
Subject: Re: UST&D Inspection plan

Paul - I interpret the complaint to involve casks manufactured before mid-1999, when the "concerned individual" led a NUPIC inspection, identified the "issue," and educated the UST&D (and/or the Holtec) QA Manager. So, it looks like a "legacy" issue for old casks. Should have made that clear in my earlier note.

I don't have a trooper available to participate - but you are likely interested in today's casks. We in RIII will decide in an ARB soon what kind of followup looks right for the old casks.

Regards,

>>> Paul Narbut 01/24/02 01:30PM >>>

Weld repairs can be dispositioned by fab personnel within the bounds of approved weld repair procedures. Dimensional discrepancies, beyond drawing tolerances, require engineering approval, and must meet CoC requirements as well.

We will certainly look in these areas during our inspection. Any specifics you can give us would be a great help. Sounds like the problem may be hard to turn up if there is no documentation and if people don't fess up. We probably will only write a Form 591 for an IR, but can give you a narrative memo for the allegation file stating our findings. Do you want to send an inspector to work with us that week? That would be an excellent cover for an allegation inspection.

>>> Bruce Jorgensen 01/24/02 01:50PM >>>

Paul - for your information, RIII has been informed of a "concern" (allegation) that UST&D has chronically "dispositioned" design changes without proper utilization of required design reviews. Specifically, they are alleged to routinely allow fabrication personnel to disposition such field anomalies as weld repairs, dimensional variances, etc. without reference to the engineering and design implications. The issue is so new that we have not determined how we will conduct follow-up.

Your inspection plan appears to address both "fabrication per procedures" and "corrective action for deficiencies" which are right in the area of potential interest. I am in no position to request the inspectors to look into this allegation, but I think it's appropriate for you to know what we've been told by a concerned individual.

Regards,

>>> Paul Narbut 01/23/02 03:22PM >>>

Team members for info and comment. Regions: any suggestions or specific problem follow-ups?

Team meeting Monday 1/28 at 1000 am

R-3  
JH

**From:** Paul Narbut, *NMS*  
**To:** Bruce Jorgensen  
**Date:** 1/24/02 2:30 PM  
**Subject:** Re: UST&D Inspection plan

*NMS*  
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*R3*  
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Team meeting Monday 1/28 at 1000 am

**CC:** Charles Miller; James Pearson; Michael Tokar; Robert O'Connell; Robert Temps; Ross Landsman