

<b>WEP</b> Closure Statement ----- Evaluation Report	<u>QUALITY INDICATOR GROUP CLOSURE</u>  IMPROPER SIGNATURES ON NDE REPORTS FOR VISUAL EXAMINATION (VT) AND PENETRANT EXAMINATION (PT)	Page <u>1</u> of <u>3</u> Date <u>11/21/86</u> Revision <u>0</u> WEP Group No <u>016</u>
	WEP GROUP IDENTIFIER <u>QI-SP-3</u>	

Approved \_\_\_\_\_ Date \_\_\_\_\_

Reviewed A. C. Bradford 11/21/86 Prepared Arthur N. Jones

Address the following items in the space remaining on this page and on additional pages as needed (see Standard Practice WEP 3.1.10 for specific instructions).

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1. Employee Concern(s)/Quality Indicator(s)

Tennessee Valley Authority (TVA) Nonconforming Condition Report 4576R (Reference 7.1).

Tennessee Valley Authority (TVA) Nonconforming Condition Report 4941 (Reference 7.2).

2. Characterization of Issue

The NCRs identified in Section 1 above describe situations where one inspector would sign off on a Nondestructive Examination (NDE) Surface Evaluation Data Sheet, Weld Material Requisition or similar record of field inspection. The related Field Weld Operation Sheet, which summarizes and references the field inspection performed, was signed off by a different inspector. This practice could be interpreted to be a violation of 10 CFR 50.100 (Reference 7.3), which prohibits falsification of inspection records.

In addition, NCR 4576R contained a Field Weld Operation Sheet which had been voided, with no apparent technical justification.

3. Summary

Not applicable.

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4. Evaluation Methodology

The Department of Energy Weld Evaluation Project (DOE/WEP), Assessment Plan 16 (Reference 7.4) required reinspection of the subject welds. However, during preliminary engineering review, it was determined that adequate documentation was available to resolve the apparent discrepancies. No DOE/WEP weld inspection is required.

5. Findings

The TVA Nonconforming Condition Report (NCR) 4576R was written on January 11, 1983 to document an apparent nonconformance where one Level II inspector signed NDE Surface Evaluation Data Sheet 19471 (Reference 7.5) and Weld Material Requisition 71596 (Reference 7.6) on January 26, 1979. The Field Weld Operation Sheet 1-15-F-7-6 (Reference 7.7) references the two previously mentioned documents but was signed off on January 26, 1979 by another inspector.

The NCR disposition accepted the documentation, stating that no procedures were violated and there was no falsification of records. The NCR was closed on the same date as written.

Field Weld Operation Sheet 1-15-F-7-6 was voided on November 8, 1982. Subsequent investigation by DOE/WEP showed that a system redesign described in Engineering Change Notice ECN 3371 (Reference 7.8), dated August 23, 1982, eliminated the section of piping containing the weld. This is adequate technical justification for voiding the Field Operation Sheet. The Authorized Nuclear Inspector (ANI) signed off on the voided Field Weld Operation Sheet on April 14, 1983.

TVA NCR 4941 was written on June 29, 1983 and dispositioned on the same day to document an apparent nonconformance. One inspector signed off NDE Surface Evaluation Sheet 19440 (Reference 7.9) on January 25, 1979 and another inspector signed off on the Repair Weld Operation Sheet 1091 (Reference 7.10) on January 24, 1979. The Repair Weld Operation Sheet referenced NDE Surface Evaluation Data Sheet 19440. The Level II Inspector who signed the NDE Surface Evaluation Sheet 19440 was the same inspector who signed NDE Surface Evaluation Sheet 19471.

The Quality Control procedure covering the situation described herein was subsequently modified to specifically permit this method of documenting inspections performed on the checklist of the Field Weld Operation Sheets. TVA Procedure WBNP-QC1-4.03, "Process Control, Welding Surveillance and Weld Procedure Assignment," dated March 5, 1984, Paragraph 6.1.3.2 (Reference 7.11) states that the welding inspector "witnesses, verifies, or examines and accepts an operation

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before the work can proceed to the next operation. It is permissible to insert a reference to documentation generated as a result of an operation or hold point, such as an NDE report number, in lieu of TVA employee's initials and date."

6. Conclusions

Further inspection of these welds by DOE/WEP is not required since the quality of the welds is not in question and no TVA procedures were violated. The DOE/WEP investigation indicated that the methods used to document the inspection on these welds were in compliance with TVA procedural requirements and that no falsification of records is associated with these NCRs.

7. References

- 7.1 TVA Nonconforming Condition Report 4576.
- 7.2 TVA Nonconforming Condition Report 4941.
- 7.3 Title 10, Code of Federal Regulations, Part 50.100.
- 7.4 DOE/WEP Assessment Plan 16, Revision 0, dated March 28, 1986.
- 7.5 TVA-WBNP NDE Surface Evaluation Data Sheet 19471.
- 7.6 TVA-WBNP Weld Material Requisition 71596.
- 7.7 TVA-WBNP Field Weld Operation Sheet 1-15-F-7-6.
- 7.8 TVA Engineering Change Notice ECN 3371.
- 7.9 TVA-WBNP NDE Surface Evaluation Sheet 19440.
- 7.10 TVA-WBNP Repair Weld Operation Sheet 1091.
- 7.11 WBN-QCI-4.03, Process Control, Welding Surveillance and Weld Procedure Assignment, Section 6.1.3.2, Revision 5, dated March 5, 1984.