

TVA EMPLOYEE CONCERNS
SPECIAL PROGRAM

REPORT NUMBER: HC-40307-SQN

REPORT TYPE: Sequoyah Nuclear Plant Element
(Final Report)

REVISION NUMBER: 2

TITLE: Scrapped Material As Related to Material
Control

PAGE 1 OF 8

REASON FOR REVISION:

Revision 1: Revised to incorporate Senior Review Panel and Technical Assistance Staff's comments.

Revision 2: Revised to include corrective action and addition of Attachment A.

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10/15/86
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CONCURRENCE (FINAL REPORT ONLY)

* SRP secretary's signature denotes SRP concurrences are in files.
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I. INTRODUCTION

This report addresses the perceived problems stated in concerns IN-85-291-001, IN-85-339-002, IN-85-624-003, PH-85-003-009, WI-85-091-014 and SQP-5-004-003. It should be noted that SQP-5-004-003 was a site-specific concern for Sequoyah Nuclear Plant (SQN) and the other concerns this element report addresses were Watts Bar Nuclear Plant (WBN) concerns that were determined to be potentially generic to SQN during evaluation at WBN.

II. SUMMARY OF PERCEIVED PROBLEM

The perceived problem as stated in the concerns that this report addresses is that material that had been scrapped was retrieved from the scrap pile and used in permanent plant installations.

III. EVALUATION METHODOLOGY

1. Reviewed expurgated files that were available for additional information.
2. Determined if additional investigations had been conducted regarding subject concerns.
3. Reviewed site procedures and upper-tier documents to determine the requirements for scrapped material and if scrapped material is adequately controlled.
4. Interviewed personnel that are now or have been associated with material installation to determine if material had been scrapped and later retrieved for installation.
5. Determined by personal observation if adequate control is in place for scrapped material.
6. Reviewed Element Report MC-40307 to determine if the findings in this report for WBN were related to SQN.
7. Reviewed Nuclear Safety Review Staff (NSRS) Report I-86-164-SQN and related documents to determine if it adequately addresses the perceived problem of material being scrapped and later retrieved for installation.

IV. SUMMARY OF FINDINGS

1. Reviewed the expurgated files that were available at the time this report was written and found they did not provide any additional information.
2. The only investigations found to have been conducted for the subject concerns were NSRS Report I-86-164-SQN and WBN Employee Concerns Task Group (ECTG) Element Report MC-40307 which had been previously identified.
3. A review of site procedures and upper-tier requirements revealed that:
 - A. During the construction phase of SQN there were no procedures in place controlling scrap material so as to prevent material that had been scrapped and its traceability maintained to be used in permanent plant installations.
 - B. There are currently procedures in place that address scrap material. However, one of these procedures (SQA-148) states, "It is common place practice to retrieve from scrap metal piles materials which may be needed for use in plant maintenance work." Also, it was apparent by the review of procedures conducted that scrap material was not adequately addressed. This could result in material being scrapped and reused before going to the Power Stores scrapyard. This is based on the facts that the work control procedures do not adequately address scrap and identifying marks which would allow records to be retrieved that establishes traceability of the material, but not indicate the material had been scrapped (out of its required storage).
 - C. 10 CFR 50, Appendix B, Criterion XIII, requires measures to be established to control the storage of material and equipment to prevent damage or deterioration.
4. It was found by the interviews conducted that:
 - A. During the construction phase of SQN, material was on occasion scrapped by mistake, its traceability maintained, and therefore retrieved for installation at a later time. However, no specific items could be identified.
 - B. Currently, material leftover or retired from repair or maintenance operations is on occasion kept for possible future use on non-QA, non-CSSC work. This practice occurs because it is difficult to return these items to Power Stores.

5. It was determined by personal observation that material placed in the Power Stores scrapyard could not be retrieved for future use without making engineering aware of the need for the material. This is based on the fact it is placed in a fenced and locked area, and access is controlled by the Power Stores Supervisor. However, material leftover or retired from maintenance and modification operations in some cases is not returned to Power Stores for credit nor put in the Power Stores scrapyard. Some of this material is placed in scrap bins that are routinely taken to the Power Stores scrapyard, and some is placed in in-house storage areas for possible future use. These storage areas are not controlled, the material is not identified as being acceptable for non-QA use only, and the storage conditions for some of this QA material are questionable.
6. A review of Element Report MC-40307 revealed that site procedures did not address scrap material and access to scrap material was not controlled. This resulted in material being scrapped (not in its required storage environment) by mistake and then being retrieved and installed.
7. It was determined by reviewing NSRS Report number I-86-164-SQN that this report adequately addressed the specific concern and there were no findings or recommendations. However, the overall program for the control of scrap material is not addressed. The conclusion in the NSRS report is based on the assumption that traceability is lost when material is scrapped and this is not always the case.

Conclusions:

During the evaluation, no items were identified as having been scrapped and retrieved from the scrapyard for installation. No conditions that would affect the safe operation of the plant have been identified to date. Therefore, the perceived problem could not be validated. However, the program controlling scrap material needs to be strengthened. Currently corporate guidance does not exist addressing this.

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V. ROOT CAUSE

Not applicable

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No problem validated/substantiated

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VI. CORRECTIVE ACTION

As provided by line management:

Revise SQM1 and SQM2 to define the requirements and responsibilities to control use of scrap materials. Elements to be included in the proposed revision are:

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1. Include requirements to review storage requirements of materials maintained in the section as spare parts and ensure storage requirements of AI-36 are complied with. |R2
2. Include requirements to evaluate cannibalized, scrapped or left over material before use, to ensure that traceability has been maintained and the material has been properly stored to maintain its qualification. |R2

The proposed Corrective Action Plan controls the use of material and not the control of storage areas for scrapped material or material kept for further cannibalization. SQA-148 will be revised to remove the statement that use of scrap materials is a common maintenance practice. The steps proposed will provide positive control of scrap materials for all future applications. There are not cases identified where a misapplication of the materials existed; Therefore, this action is considered appropriate. |R2

Reference: CATD 40307-SQN-01 |R2

VII. GENERIC APPLICABILITY

Based on the similarities of this problem/condition at WBN and SQN and the fact that some of the personnel involved are now or have been at Browns Ferry Nuclear Plant (BFN) and Bellefonte Nuclear Plant (BLN), this problem is potentially generic to BFN and BLN.

VIII. ATTACHMENTS

Attachment A: Listing of concerns indicating relationship to Nuclear Safety and Generic Applicability. |R2

TVA Employee Concerns
Special Program

Attachment A

CONCERN NUMBER	CAT	SUB CAT	PLT LOC	GENERIC APPL				QCI/NSRS INVESTIGATION REPORT	P# S R	CONCERN DESCRIPTION
				B	B	S	W			
IN-85-624-003 T50060	MC	403	WBN	Y	Y	Y	N	Report	NS	Material has been taken from the scrap yard back to the plant (Names known to QTC).
PH-85-003-009 T50106	MC	403	WBN	Y	Y	Y	N	Report	NS	Valves that had been scrapped were used for installation in 1980. CI has no more information no follow up required.
SQP-85-004-003 T50229	MC	403	SQN	Y	Y	N	Y	I-86-164-SQN K-Form	NS	Sequoyah: New material has been ordered scrapped by a supervisor and later retrieved by a different group. This could represent a lack of control regarding scrapped material. Names/details known to QTC and withheld to maintain confidentiality. No further information may be released. Nuclear power concern. CI has no further information. No follow up required.

**TVA EMPLOYEE CONCERNS
SPECIAL PROGRAM**

REPORT NUMBER: MC-40307-SQN

REVISION NUMBER: 2

PAGE 7 OF 8

WI-85-091-014	MC	403	WBN	Y Y Y N	I-85-713-WBN	NS	TVA has very poor control over snubbers in the manner in which they are stored and handled. These expensive snubbers are frequently scrapped and later retrieved from the scrap yard for installation. CI has no further information. Construction department concern.
T50197	MC	404		Report			
	MP	711					
IN-85-291-001	MC	403	WBN	Y Y Y N		NS	Valves, pipe, hanger material, etc. are retrieved from scrap pile for use in plant (Good material that had been thrown away per employee). No documentation required. Material may have been there for quite some time out of the controlled storage level.
T50041				Report			