

TENNESSEE VALLEY AUTHORITY

Watts Bar Nuclear Plant
P. O. Box 800
Spring City, Tennessee 37381

December 5, 1986

Mr. Harold Denton
Director of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
7920 Norfolk Avenue
Bethesda, Maryland 20814

Dear Mr. Denton:

In the Matter of the Application of) Docket Nos. 50-327
Tennessee Valley Authority) 50-328

EMPLOYEE CONCERNS TASK GROUP (ECTG)

Enclosure 1 to this letter transmits for NRC's review four initial element reports addressing Sequoyah Nuclear Plant employee concerns in the Welding Category, and one initial report in the Operations Category. (These reports have been reviewed and approved by the Senior Review Panel).

As has been previously discussed with your staff, the welding reports addressing employee concerns have been left in the format used by the Weld Task Group.

Enclosure 2 transmits the final report for 11 elements addressing Sequoyah Nuclear Plant employee concerns in the following categories:

Stone & Webster Items - 2 reports
Welding - 9 reports

As indicated by the report cover sheets, these reports have completed final review by the Senior Review Panel and ECTG management.

To assist you in your review of these reports, Enclosure 3 provides a comparison between the ECTG Writer's Guide recommended report format and the transmitted reports. The guidance of the Writer's Guide does not apply to the Stone and Webster reports. Enclosure 4 provides a listing of the report numbers, the related employee concerns, and the previous submittal dates if applicable.

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PDR ADOCK 05000327
P PDR

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Mr. Denton

Please telephone Martha Martin at (615) 365-3587 (Watts Bar) if you have any questions.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



J. A. McDonald
Watts Bar Nuclear Plant
Site Licensing Manager

Enclosures
cc (Enclosures):

Mr. James M. Taylor, Director
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U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Mr. B. J. Youngblood, Project Director
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U.S. Nuclear Regulatory Commission
Region II
Attn: Mr. Gary Zech
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Atlanta, Georgia 30323

Mr. B. D. Liaw, Branch Chief
U.S. Nuclear Regulatory Commission
7920 Norfolk Avenue
Room T-1132
Bethesda, Maryland 20814

ENCLOSURE ¹/₂

TVA EMPLOYEE CONCERNS
SPECIAL PROGRAM

REPORT NUMBER: I-86-115-SQN

REPORT TYPE: Welding Project

REVISION NUMBER: 0

TITLE: Craft Welder Incapable Of Making Proper Welds

REASON FOR REVISION: N/A

SWEC SUMMARY STATEMENT: Concerns Considered
SQM-6-005-001
SQM-6-005-X02

PREPARATION

PREPARED BY:

Original Signed By R. M. Bateman
SIGNATURE

11-06-86
DATE

REVIEWS

PEER:

Original Signed By J. E. Rose
SIGNATURE

11-06-86
DATE

TAS: *DDM* *11/24/86* TECHNICAL REVIEW ONLY
RR

D. Stewart

SIGNATURE

11/26/86
DATE

CONCURRENCES

Original Signed By
CEG-H: J. F. Lewis for LEM

11-25-86

SIGNATURE

DATE

SRP:

SIGNATURE*

DATE

APPROVED BY:

ECSP MANAGER

DATE

MANAGER OF NUCLEAR POWER
CONCURRENCE (FINAL REPORT ONLY)

DATE

*SRP Secretary's signature denotes SRP concurrences are in files.

2242T

WELDING PROJECT
SQN SPECIFIC EMPLOYEE CONCERNS

DATE 11/6/86

SUBJECT: SEQUOYAH SPECIFIC EMPLOYEE CONCERNS -
SUMMARY OF WP ENGINEERING EVALUATION

CONCERN CONSIDERED: SQM-6-005-X02

PREPARED BY R. Butaman, 11/6/86, DNC, WP

REVIEWED BY J.E. Rose 11/6/86, DNC, WP

REVIEWED BY R.P. Lyndey 11/20/86, DQA, WP

REVIEWED BY James T. Lewis 11/25/86 FOR LRM, CEG-H, Welding

APPROVED BY _____, Program Manager

WELDING PROJECT
SQM SPECIFIC EMPLOYEE CONCERNS

DATE 11/6/86

SUBJECT: SEQUOYAH SPECIFIC EMPLOYEE CONCERNS -
SUMMARY OF WP ENGINEERING EVALUATION

CONCERN CONSIDERED: SQM-6-005-001

PREPARED BY R. Bateman, 11/6/86, DNC, WP

REVIEWED BY J.E. Roe 11/6/86, DNC, WP

REVIEWED BY R.P. Lynskey 11/20/86, DQA, WP

REVIEWED BY James H. Lewis 11/25/86 FOR LEM, CEG-H, Welding

APPROVED BY _____, Program Manager

This package summarizes the actions taken by the Welding Project (WP) to evaluate and disposition the subject SQN-specific employee concern which was previously evaluated by NSRS/QTC/ERT and summarized in WP Phase I and Phase II reports.

The Welding Project analyzed each SQN-specific employee concern (Attachment 2) to determine the statement(s) being voiced by these individuals.

These statements were then evaluated both individually and collectively to develop issues.

Each issue was then incorporated into the WP review activities of Phase I, "Procedural Assessment" and Phase II, "Procedural Implementation."

During Phase I, each issue was analyzed against requirements of the applicable QA program, policies, NSRS/QTC/ERT Investigation Reports, and other relevant information to determine if program elements were deficient when evaluated against upper tier requirements.

Phase II consisted of a sample reinspection of hardware and independent program audit by Bechtel.

In each area analyzed by Bechtel, the auditors found no objective evidence to substantiate the employee concerns considered. The following areas directly related to employee concerns were investigated by the audit team:

1. Welder qualification and attendant records
2. Welder qualification and attendant on-the-job-training
3. Welding inspections
4. Welding inspectors training programs
5. Weld material traceability
6. Welding inspections by craft personnel
7. Weld material control

Each of these areas was investigated by the auditors for both construction and operations phases. In all cases, there was no objective evidence to substantiate the employee concerns. The audit report concludes that both construction and operations phases have had and now have a functioning Welding Quality Assurance Program which meets code, standard, and regulatory requirements and that the employee concerns considered were found to be unsubstantiated and without technical merit.

The results of the reinspection program at SQN also give another, additional verification of the Welding Quality Assurance Program for both construction and operations phases and serve to establish additional confidence in the accuracy and implementation of these programs through hardware inspections and attendant document reviews. In all cases, the components and items were found to be acceptable upon initial reinspection or found to be acceptable after engineering analysis.

The WP analysis of SQN Specific Employee Concerns supplemented by the independent Bechtel Audit, reinspection of installed components and systems, and independent (NSRS) overview and investigations has not revealed any significant or generic inadequacies in the welding programs for either the construction or operations phase at SQN which have been directly identified through the Employee Concern Program. The Employee Concern Program has simply reiterated problems which have been or are now being resolved through existing corrective action programs in the overall Nuclear Quality Assurance Program.

A summary analysis of the WP evaluations and recommendations is included in Attachment 1.

SUMMARY OF SQN SPECIFIC EMPLOYEE
CONCERNS REVIEWED BY WELDING PROJECT

EMPLOYEE CONCERN NUMBER	ISSUE	WP ACTION
XX-85-088-003	Alterations to Welder Qualification Records in Knoxville	Not substantiated by ERT Report XX-85-088-003 of 3/8/86 (Attachment 3).
XX-85-124-001	Burial of Electrode Stubs	Not safety-related. No action required.
XX-85-086-003	Box Anchor Design Deficiency.	Substantiated by NSRS Report I-85-560-SQN (Attachment 3). WP concurs with report recommendations.
XX-85-069-003-R1	Acceptance of Previously Rejected NDE Items	Not Substantiated by NSRS Report I-85-738-SQN (Attach- ment 3). WP concurs with report recommendations.
SQM-5-001-001 SQM-5-001-002 WBM-5-001-002 (Also Listed in the Generic Summary)	Uncertified Welder Foreman Performing Preweld Inspections	Substantiated by WP Evaluation Report WP-16-SQN (Attachment 3). Interim corrective actions are being formulated. Closure is based on these actions. Additional corrective actions may be implemented.
XX-85-068-007	Manufacture of Dravo Spool Piece	Not substantiated by NSRS REPORT I-85-636-SQN (Attachment 3).
XX-85-069-001 XX-85-069-001-R1 XX-85-069-X05 XX-85-069-007	Inadequate OJT-Records for ISI and QC Personnel for NO	The general issue of inadequate OJT-records was substantiated by NSRS Report I-85-373-NPS (Attachment 3). No falsification of records was substantiated. WP con- curs with report recommen- dations.

EMPLOYEE CONCERN NUMBER	ISSUE	WP ACTION
SQM-6-005-001 SQM-6-005-X02	Craft Welder Incapable of Making Proper Welds	SQM-6-005-001 was substantiated; SQM-6-005-X02 was not substantiated by NSRS Report I-86-115-SQN (Attach- ment 3). WP concurs with report.
XX-85-013-001	E309 Electrode Used to Weld E316 Steels	This is an acceptable practice. ERT investigated in ERT Report XX-85-013-001, dated 3/22/85 (Attachment 3). WP concurs.
XX-85-041-001	Improper Weld Rod Used in Diesel Generator Building	Not substantiated by NSRS Report I-85-756-SQN (Attachment 3).
XX-85-049-001 XX-85-049-X03	Welder Certifications Updated Without Meeting Requirements	XX-85-049-001 was substantiated as it relates to Welder Continuity Require- ments. This had previously been identified by NO in an audit. XX-85-049-X03 was not substantiated. Details and recommendations are given in NSRS Report I-85-135-SQN (Attachment 3). WP concurs with I-85-135-SQN-01 through -03 and recommends they be closed based on the WP-Bechtel Audit of SQN in Key Elements 4.0, 5.0, and 17.0 (Attachment 4).
XX-85-054-001	QC Holdpoint Sign-Off Violation	Not substantiated by NSRS Report I-85-346-SQN (Attachment 3).
XX-85-065-001	Performance of Remote Visual Inspections	Not substantiated by NSRS Report I-85-750-SQN (Attachment 3).

EMPLOYEE CONCERN NUMBER	ISSUE	WP ACTION
XX-85-083-001	SQL Weld Inspections not as Strict as WBN	Not substantiated by NSRS Report I-85-652-SQN (Attachment 3).
XX-85-098-001	Laminated Pipe in Unit 2 Condenser. This issue is also on the Generic Summary	Not safety-related. Not substantiated by WP Evaluation Report WP-18-SQN (Attachment 3).
XX-85-100-001	Improper Weld Repair on an Undetermined Number of Welds	Not substantiated by ERT Report XX-85-100-001, dated 3/5/86 (Attachment 3).
XX-85-101-006	Welder Certification for the Construction Era	ERT Report XX-85-101-006 (Attachment 3) with NSRS Recommendations indicates that this concern is substantiated. WP takes exception to this ERT Report based on subsequent information provided in Attachment 4. WP exceptions, recommendations, and basis for closure were discussed with NSRS as documented in Attachment 5. WP recommends this concern not be substantiated and that it be closed based on the WP-Bechtel Implementation Audit, Key Elements 4.0, 5.0, 17.0 (Attachment 6).
XX-85-102-011	NDE Inspectors Cannot Write Notice of Indications for Preservice-Related Defects	Not substantiated by NSRS Report I-85-735-SQN (Attachment 3).
XX-85-108-001 XX-85-108-002	Socket Welds Not Inspected	Not substantiated by NSRS Report I-85-776-SQN (Attachment 3).

11/04/86

(EMPLOYEE CONCERNS)

11:25:06

CAT	ISSUE	PLANT	PRIORITY	ORG	QTC	EGG	INSP	SD	RD	GD	IO	-----CONCERN-----
		S	1					SR				SQM-6-005-001

WORDS: QUALIFICATION CRAFTSMAN SPECIFIC

PROB: WCPQW

CRAFT INDIVIDUAL (KNOWN) WAS PASSED THROUGH THE WELDING TEST IN MARCH 1985, BY AGREEMENT BETWEEN ENGINEERING (KNOWN) AND THE GENERAL FOREMAN (KNOWN). THE INDIVIDUAL IS ALLEGED AS BEING INCAPABLE OF MAKING A PROPER WELD, AND EVERY WELD THE INDIVIDUAL HAS MADE IN THE CONTAINMENT AREA OF THE REACTOR BUILDING HAS HAD TO BE REDONE. ADDITIONAL DETAILS ARE KNOWN. ANONYMOUS CONCERN. NO FOLLOW-UP REQUIRED.

IR: 1-86-115-SQN

STAT: RC:

TECHNICAL COMMENTARY:

11/04/86
11:25:48

(EMPLOYEE CONCERNS)

1480 2 2

CAT ISSUE PLANT PRIORITY ORG QTC EGG INSP SD RD GD IO -----CONCERN-----
S 1 SR SQM-6-005-X02

WORDS: CERTIFICATION IMPLEMENTATION FALSE SPECIFIC PROB: WCPQW

WELDER CERTIFICATION TEST RECORDS WERE POTENTIALLY FALSIFIED FOR AN INDIVIDUAL (KNOW), BY AGREEMENT BETWEEN ENGINEERING (KNOW) AND GENERAL FOREMAN (KNOW). OCCURRED IN MARCH 1985. ADDITIONAL DETAILS KNOWN. ANONYMOUS CONCERN. NO FOLLOW-UP REQUIRED. OR LOCATIONS OF USE ARE KNOWN. CONSTRUCTION DEPT. CONCERN. C/I HAS NO FURTHER INFORMATION. NO FOLLOW-UP REQUIRED.

IR: 1-86-115-SQN STAT: RC:

TECHNICAL COMMENTARY: