

OCT 26 1982

Docket No.: 50-275

MEMORANDUM FOR: Chairman Palladino  
Commissioner Gilinsky  
Commissioner Ahearne  
Commissioner Roberts  
Commissioner Asselstine

FROM: Darrell G. Eisenhut, Director  
Division of Licensing  
Office of Nuclear Reactor Regulation

SUBJECT: INFORMATION ITEMS REGARDING THE DESIGN VERIFICATION PROGRAM - FOR DIABLO CANYON, UNIT 1 (Board Notification No. 82-109) *586 RPT*

In accordance with present NRC procedures for Board Notifications, the following items are enclosed for information of the Commission:

- ✓ 1. Teledyne Engineering Services, Independent Design Verification Program: Program Plan for Construction Quality Assurance, Rev. 1, October 1, 1982.
- ✓ 2. Teledyne Engineering Services, Independent Design Verification Program: IDVP Comments to PG&E Phase I Final Report, October 7, 1982.
- 3. Teledyne Engineering Services, Independent Design Verification Program: TES Semi-Monthly Report, October 8, 1982.
- 4. R. L. Cloud Associates Inc., Open Items Reports, October 8, 1982.
- 5. R. F. Reedy Inc., Semi-Monthly Report, October 8, 1982.
- 6. Stone & Webster Engineering Corp., SWEC October Semi-Monthly Report, October 8, 1982.
- ✓ 7. Teledyne Engineering Services, letter to G. A. Maneatis, PG&E, et. al. regarding independence of RFR employees, October 14, 1982.
- ✓ 8. Teledyne Engineering Services, letter to G. A. Maneatis, PG&E, regarding TES evaluation of URS/Blume model, October 15, 1982.
- 9. Teledyne Engineering Services, letter to H. R. Denton regarding TES evaluation of BNL report, October 15, 1982.

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SECRET

- ✓ 10. Teledyne Engineering Services, letter to D. G. Eisenhower, October 15, 1982, regarding NRR letter of October 6, 1982 requesting IDVP consideration of Region V comments.
- ✓ 11. Teledyne Engineering Services, letter to D. G. Eisenhower, October 12, 1982, regarding NRR letter of August 19, 1982 requesting IDVP views on structures, systems and components required for fuel loading.

The enclosures provide information on the status of activities performed under the Independent Design Verification Program (IDVP) for Diablo Canyon Unit 1 by the participating organizations. The information is relevant to the safety issue on the design adequacy of Diablo Canyon Unit 1. This is the subject of Commission Order CLI-81-30 which is the basis for the IDVP. The staff is evaluating the information as part of its ongoing review of the IDVP efforts and will report on the results prior to reinstatement of the license. The material does not pertain to those matters that were resolved by ALAB 644.

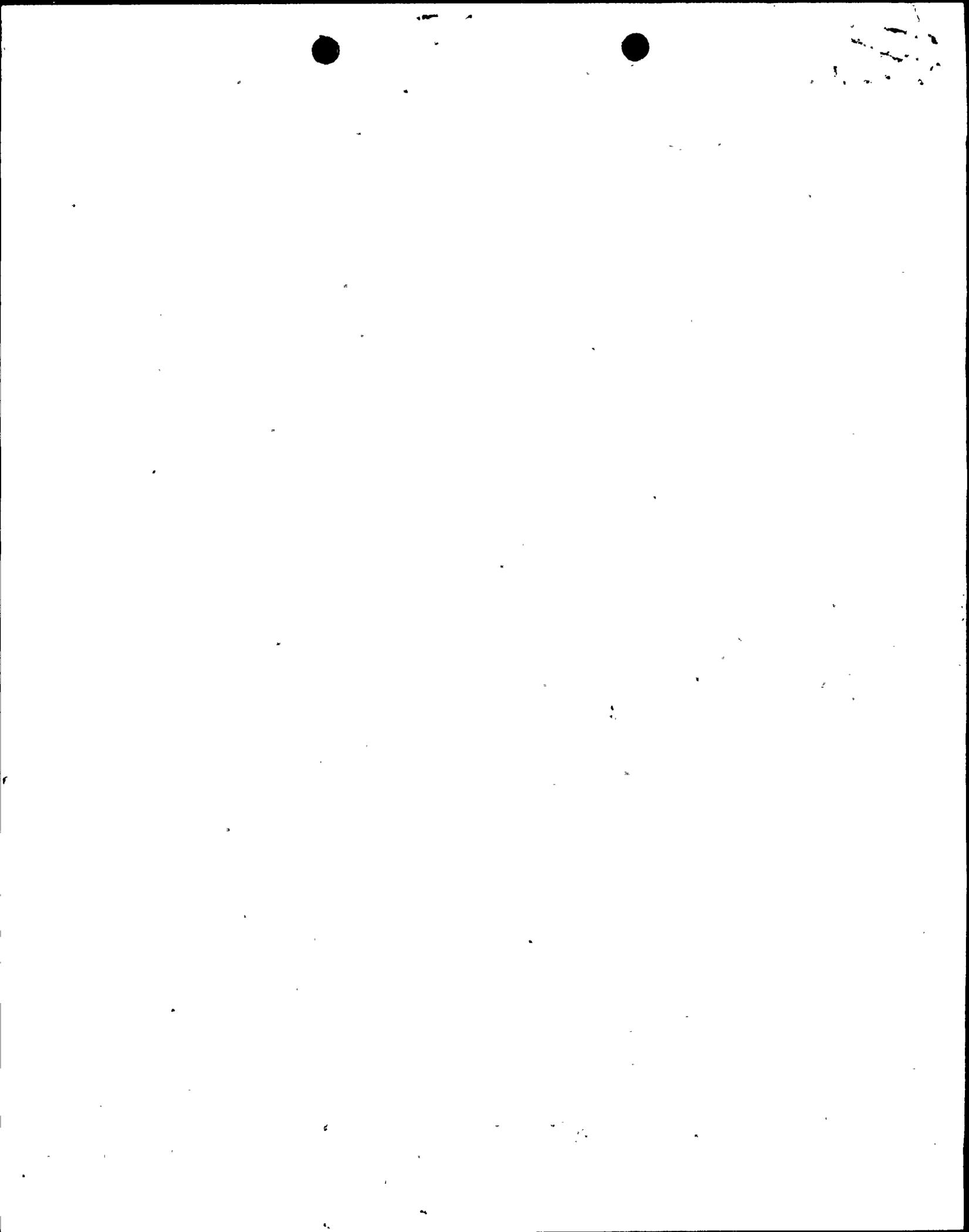
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Enclosures:  
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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE COMMISSION

In the Matter of )  
PACIFIC GAS AND ELECTRIC COMPANY ) Docket Nos. 50-275 OL  
(Diablo Canyon Nuclear Power Plant, ) 50-323 OL  
Units 1 and 2) )

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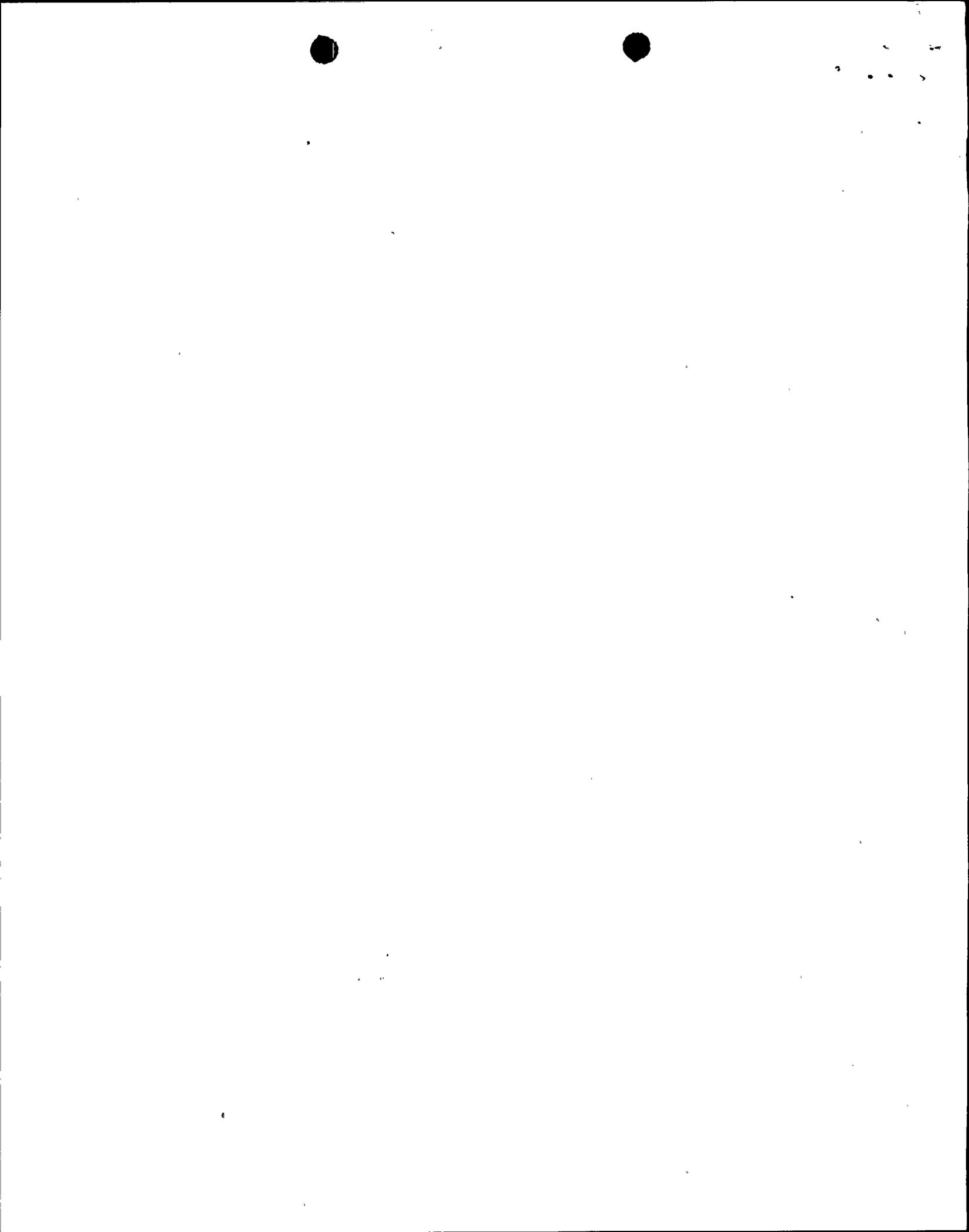
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BOARD NOTIFICATION

OCT 26 1982

BN-82-109  
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DIABLO CANYON NUCLEAR POWER PLANT  
INDEPENDENT DESIGN VERIFICATION PROGRAM

PROGRAM PLAN

FILED

REVISION 1

5511  
12/7/82

ADJUNCT PROGRAM FOR EVALUATION  
OF CONSTRUCTION QUALITY ASSURANCE

OCTOBER 1, 1982

PREPARED BY

TELEDYNE ENGINEERING SERVICES

AS PROGRAM MANAGER, TES PROJECT 5511

Docket No. 50-275  
License No. DPR-76

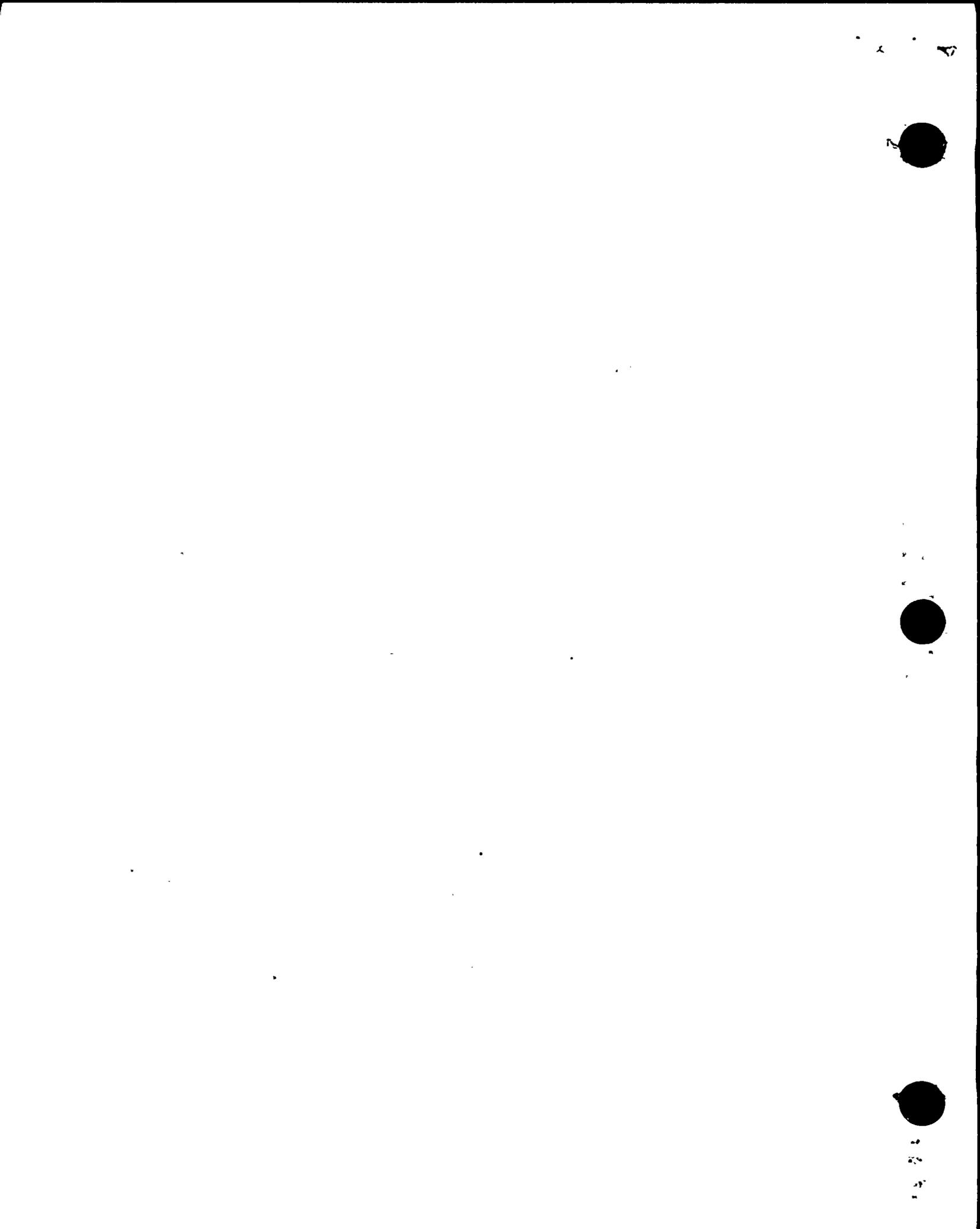


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ADJUNCT PROGRAM FOR EVALUATION OF  
CONSTRUCTION QUALITY ASSURANCE

OCTOBER 1, 1982

1.0 INTRODUCTION

This Program Plan defines the management and technical aspects of an evaluation of construction Quality Assurance being conducted by the Diablo Canyon Nuclear Power Plant (DCNPP) Independent Design Verification Program (IDVP) as an adjunct\* to the Phase II Program. The Pacific Gas and Electric Company (PG&E) advised the Nuclear Regulatory Commission-Nuclear Reactor Regulation (NRC-NRR) of their intent to proceed with such an evaluation by letter of September 7, 1982, Reference 1. The objective is to complete the evaluation and issue an interim report prior to mid-November 1982 and to issue a final report prior to mid-December 1982.

The "Adjunct Program for Evaluation of Construction Quality Assurance" is a programmatic Quality Assurance audit of a representative sample of construction activities. It is termed as "Adjunct Program" to the Phase II Program because it is to be performed under the direction of the IDVP Program Manager, Teledyne Engineering Services (TES); by an organization which is participating in the IDVP, Stone and Webster Engineering Corporation (SWEC); in accordance with the applicable portions of the Phase II Program Management Plan, Reference 2; in the general time frame of the Phase II Program; but, is not design related nor required by the NRC Order or Letter so it is not an essential part of the IDVP Phase II Program. This construction Quality Assurance Program was voluntarily proposed by PG&E at an NRC-PG&E-IDVP meeting of September 1, 1982 to "Lay this unwarranted public concern to rest, and to avoid further delay in the licensing of Diablo Canyon..." (Tr, Pg. 11, 13-15).

The Program Management Plans for the performance of an Independent Design Verification Program (IDVP) for the Diablo Canyon Nuclear Power Plant Unit 1 (DCNPP-1) are intended to respond to an NRC "Order" and "Letter," respectively. The program is being conducted in two phases, corresponding to the NRC requirements for restoration of the low-power license ("Order") and for operation above 5% power ("Letter"), respectively. These NRC requirements relate to the design efforts performed internally by the PG&E, or on behalf of PG&E by service-related contractors, on safety-related structures, systems, and components. Phase I is restricted to seismic-related efforts of PG&E and of their service contracts performed prior to June 1, 1978. Phase II includes non-seismic service-related contracts performed prior to June 1978, PG&E internal design activities, and all service-related contracts post-January 1978.

\*Webster: "Something joined or added to another thing but not essentially a part of it."



Each IDVP phase is conducted in accordance with a Program Management Plan which includes a number of Program Procedures as appendices. For each phase, the corresponding procedure provides an Engineering Program Plan which defines the technical work to be performed. The text of the Phase II Program Management Plan itself, separate from the appendices, includes the following sections:

- 1.0 Introduction (references NRC Order and Letter)
- 2.0 Background and Objectives (NRC requirements, general organization and participant scopes)
- 3.0 Engineering Program Plan (summarizes methodology, criteria and performance guidelines)
- 4.0 TES Methodology and Project Organization (identifies senior individuals and summarizes technical and management assignments)
- 5.0 PG&E Actions (summarizes PG&E Internal Technical Program, relationships with IDVP)
- 6.0 Reporting (defines the types of reports including the Open Item Report System)
- 7.0 Documentation (requires that all results be documented and based upon documented information)

The "Adjunct Program for Evaluation of Construction Quality Assurance" (CQA) is to be performed in accordance with the technical "CQA Program Plan" which is defined by 3.0 of this document in accordance with the objectives defined in 2.0. The remainder of this document, 4.0 through 7.0 invokes and supplements, the similarly numbered sections of the Phase II Program Management Plan for management of the CQA.

## 2.0 OBJECTIVES AND ORGANIZATION

### 2.1 Objectives

This review is intended to assess whether the construction of Diablo Canyon was performed in accordance with quality requirements appropriate for the time of plant construction. The approach is to evaluate the work of two of the principal contractors which performed work important to safety at the plant. The review is structured to provide reasonable confirmation that the construction quality program meets the applicable standards for the time of nuclear power plant construction.

The review will start with an evaluation of whether the construction documentation gives confidence that the construction work correctly incorporates essential design features. To confirm this, samples of actual construction will be used to verify that the facilities were correctly built and that other construction requirements were met.

### 2.2 Organization

In addition to the TES and SWEC scopes defined in 2.3 and 2.4, of Reference 2:



- a. TES shall perform the additional scope defined in 4.0 of this document.
- b. SWEC shall perform the CQA scope of work defined in 3.0, shall report the work in accordance with 6.0 and document the work in accordance with 7.0 to satisfy the objectives of 2.1. All cited numbers being those contained in this document.

### 3.0 CONSTRUCTION QUALITY ASSURANCE (CQA) PLAN

#### 3.1 Scope

Construction work of two major construction contractors has been selected as the subject area for the evaluation. The contractors and the work performed by them, to be covered by the review, are as follows:

- Guy F. Atkinson Co. (GFA) -- civil/structural work on the containment building
- Wismer and Becker (W-B) -- installation of NSSS piping.

An appropriate sample for evaluation will be selected from the work of each contractor to provide evidence of his quality practices in each major area of activity. The sample shall be submitted for approval to TES prior to use.

This review will be conducted in accordance with the applicable provisions of Stone & Webster "Standard Nuclear Quality Assurance Program -SWSQAP 1-74A". However, the documents to be used during this review, in determining the extent of compliance with the requirements, will be those applicable to the contractors when their work was performed.

REV 1

Detailed descriptions of tasks A through D included in this program are in the following subsections. The SWEC procedures for tasks A and B will be provided to TES for comments. Potential Findings, as identified in Tasks A and B will be processed in Task C and reported as required by Task D.

REV 1

#### 3.2 Task A - Quality Assurance

##### 3.2.1 Objective

Evaluate the two designated contractors' quality programs to determine if adequate controls and practices to assure the quality of construction and the incorporation of essential design features into the completed plant were evident and to determine if controls were consistent with applicable NRC requirements at the time the work was performed.



### 3.2.2 Subtasks

- a. Develop procedures and checklists, as appropriate, to:
  - o Evaluate each contractor's quality program and procedures to determine if practices adequate to assure that construction requirements (i.e. drawings, instructions, specifications) were met by those responsible for the construction activity.
  - o Evaluate each contractor's quality program to determine if practices covering audits and inspections were adequate.
  - o Evaluate each contractor's quality program to determine if practices governing the identification, control and dispositioning of construction nonconformances were adequate.
- b. Conduct the specified evaluations utilizing experienced auditors qualified and certified in accordance with ANSI N45.2.23. Areas and items examined and the results of the examination shall be identified and documented on checklists so as to be repeatable.
- c. All Potential Findings identified in conjunction with the accomplishment of Task A shall be processed and reported in accordance with Tasks C and D, respectively.

### 3.3 Task B - Construction Verification Review

#### 3.3.1 Objective

Evaluate if physical installation of selected components of safety system and structures conforms to the requirements of design drawings and specifications; and that required inspections were performed.

#### 3.3.2 Subtasks

- a. Develop procedures and checklists as appropriate to:
  - o Verify that construction of selected components reflects essential design features.
  - o Verify that appropriate documentation was provided to record variations, and, where required, as-constructed conditions.
- b. Choose items for physical verification of key elements from work of the contractors and specify these in a walkdown list. The list of items and attributes to be verified will be sufficiently representative to permit conclusions to be drawn as to the adequacy of installation work.



- c. Conduct the specified walkdowns and verifications utilizing experienced personnel certified in accordance with ANSI N45.2.6 in the discipline being examined. Areas and items examined and the results of the examination shall be identified and documented so as to be repeatable. The walkdown shall be primarily a visual verification of component installation to provide confidence that dimensional requirements have been met.
- d. All Potential Findings identified in conjunction with the accomplishment of Task B shall be processed and reported in accordance with Task C and D, respectively.

### 3.4 Task C - Processing of Findings

#### 3.4.1 Objectives

Review all Potential Findings identified during the review and provide for evaluating and classifying the significance of Potential Findings.

#### 3.4.2 Subtasks

- a. SWEC will establish a Findings Review Committee composed of several senior SWEC personnel with broad experience in nuclear power plant engineering, quality assurance and construction management and a similar TES employee.
- b. The Committee shall define criteria for determining the degree of impact that Potential Findings have on plant adequacy for DCNPP-1.
- c. The Committee shall establish a procedure to process Potential Findings. This procedure shall provide an opportunity for PG&E to comment on the definition and accuracy of Potential Findings.
- d. The committee shall review each Potential Finding for definition and accuracy and will assess its impact on the adequacy of the plant. The committee shall recommend classification of Potential Findings to TES in accordance with the following:

<u>Committee Determination</u>	<u>Classification</u>
1. Finding accurate and has potential for significant impact on adequacy of Diablo Canyon Unit 1 (DCNPP-1)	Finding
2. Finding accurate but does not have potential for significant impact on adequacy of DCNPP-1	Observation
3. Finding not accurate	Invalid



### 3.5 Task D Report

Reports shall be prepared in accordance with 6.0.

## 4.0 TES METHODOLOGY AND PROJECT ORGANIZATION

### 4.1 TES Methodology

In addition to the contents of the similarly numbered section of Reference 2, TES shall assure that the CQA Program is performed in a technically competent, independent and timely manner which is consistent with its objectives.

### 4.2 Project Organization

In addition to the contents of the sections 4.2 through 4.7 of Reference 2:

- a. Dr. W. E. Cooper, as Project Manager for TES shall review the recommendations of the Findings Review committee for compliance with established criteria and, when criteria have been properly applied and documented, he shall declare the Potential Finding as a Finding or Observation as recommended by the Findings Review Committee and transmit and report the item in accordance with this plan. In addition, he shall be responsible for the verification of PG&E Corrective Action taken in response to a Finding and the reporting of resolutions.
- b. Mr. L. C. Noriega's scope is increased to include the efforts of SWEC in performance of their CQA activities.
- c. Mr. J. A. Flaherty will serve as the TES employee on the Findings Review Committee. This will be Mr. Flaherty's only IDVP assignment and he will not be under the direct supervision of Dr. Cooper.

## 5.0 PG&E ACTION

In addition to the contents of the similarly numbered sections of Reference 2, PG&E shall comment on the definition and accuracy of Potential Findings in accordance with the procedure established by the Findings Review Committee for the processing of Potential Findings. Review by the Guy F. Atkinson, Co. (GAF) and Wismer and Becker (W-B) shall be requested and coordinated by PG&E.



## 6.0 PROGRAM REPORTS

### 6.1 Types of Reports

The following types of reports will be prepared:

- (1) Semimonthly Report
- (2) Interim Technical Report on Construction Quality Assurance (ITR-CQA)
- (3) Final Report on Evaluation of Construction Quality Assurance.

In addition, the Error or Open Item (EOI) report system used in Phase II, and described in Ref. 2, Appendix E, will be adapted to the CQA effort in the manner defined in 6.3 of this document.

### 6.2 Semimonthly, Interim Technical and Final Reports

Each of these is defined as follows:

- (1) Semimonthly reports shall be prepared in accordance with 6.2 (1) of Reference 2.
- (2) The ITR-CQA shall have the same intent as does the Final Report and will be issued by mid-November 1982..
- (3) The Final Report on Evaluation of Construction Quality Assurance will be issued in mid-December 1982 and will compile all evidence reviewed, Potential Findings, Observations and Findings, including their description, comments, assessment of impact, results of the Findings Review Committee, results of the review of PG&E corrective action plans, and will assess the PG&E QA Program for construction of DCNPP Unit 1. The report will include a description of the work performed, an identification of documents used in or generated by this project, the results of the review, and the conclusions drawn from each task.

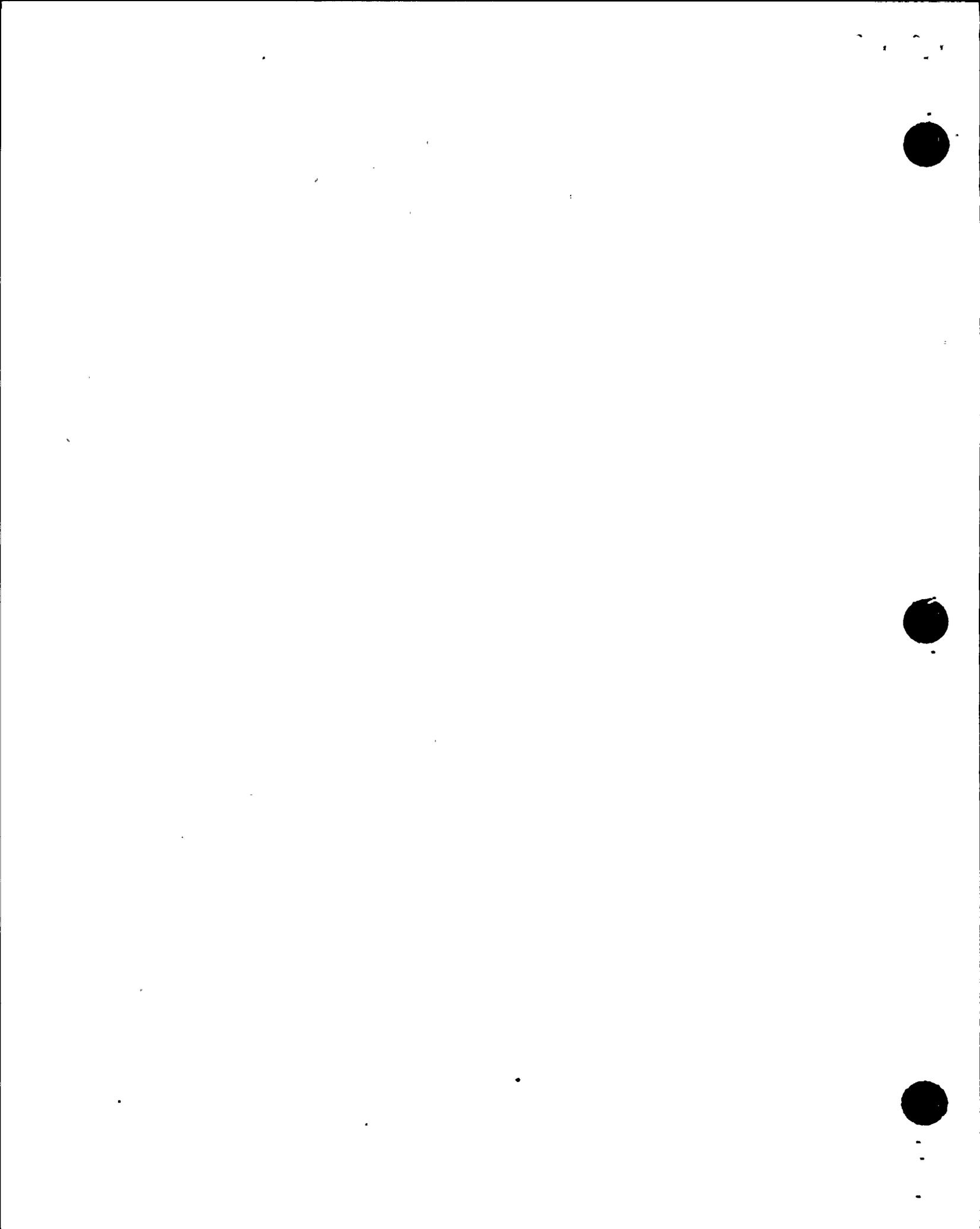
### 6.3 Application of Open Item Report System

The EOI System described by 6.3 of Reference 2 and by DCNPP-IDVP-PP-003, Revision 1 will be utilized as a tracking system, using the following interpretations.

- a. Open Item Reports (OIR) shall be issued by SWEC to report Potential Findings. The file number shall be assigned in sequence from the range of numbers 9000-9999.
- b. Issuance of the OIR will initiate PG&E action in accordance with 5.0 to verify the definition and accuracy of Potential Findings. PG&E shall report their results to TES and SWEC by use of a PG&E Resolution sheet.



- c. The Findings Review Committee shall report their recommendation to TES, with a copy to PG&E, as follows:
- (1) A Potential Error Report as a Class A Error (ER/A) shall be used for recommended Findings.
  - (2) A Potential Error Report as a Class C Error shall be used for recommended Observations.
  - (3) A Potential Program Resolution Report as a Closed Item shall be used for recommended invalid Potential Findings.
- d. When the recommendation of the Findings Review Committee are considered by TES to be in compliance with established criteria:
- (1) An Error Report as a Class A Error shall be issued for Findings.
  - (2) An Error Report as a Class C Error shall be issued for Observations.
  - (3) A Program Resolution Report as a Closed Item shall be issued for invalid Potential Findings
- If the recommendations of the Findings Review Committee are not considered by TES to be in compliance with established criteria, TES will issue an Open Item report, keeping the same File Number, referring the item back to the Findings Review Committee.
- e. In response to a Finding (ER/A), PG&E shall develop and implement corrective action. They may consult with the IDVP, through TES, in the development and implementation of such action. Following completion of the corrective action, PG&E will so notify TES and SWEC by issuance of a PG&E Completion Report; TES will issue an Open Item Report, keeping the same File number; and SWEC will verify the corrective action.
- f. When SWEC verifies the corrective action, including review by the Findings Review Committee, the Findings Review Committee will report its recommendation to TES, with a copy to PG&E as follows:
- (1) A Potential Error Report as a Class A Error shall be used if the PG&E Corrective Action is not acceptable.
  - (2) A Potential Program Resolution Report as a Closed Item when the PG&E Corrective Action is acceptable.
- g. The recommendations of the Findings Review Committee will be reviewed and reported by TES as follows:
- (1) An Error Report as a Class A Error if TES concurs that the PG&E Corrective Action is not acceptable.
  - (2) A Program Completion Report as a Closed Item when the PG&E corrective action is acceptable, so that the Finding is deemed to be resolved.



- h. An IDVP Completion Report will be issued by TES following issuance of an Error Report as a Class C Error (Observation) and following issuance of a Program Resolution Report as a Closed Item (invalid Potential Findings or resolved Finding).

7.0 DOCUMENTATION

The principles of 7.0 of Reference 2 apply to the CQA program.



REFERENCES

1. Pacific Gas and Electric Co. Letter (Crane) to NRC-NRR (Eisenhut) of September 7, 1982. ;
2. "Diablo Canyon Nuclear Power Plant-Unit 1, Independent Design Verification Program, Program Management Plan, Phase II", prepared by Teledyne Engineering Services as Program Manager, June 18, 1982.

