

SSER

Task: Allegation A-147

Reference No.: 4-84-A-06-42

Characterization: It has been alleged that Cadweld test reports were "created" due to lost records as evidenced by signatures which appear in the Cadweld tensile test reports as being noticeably different for the same technician.

Assessment of Allegation: During the QA review of Cadweld records it was found that some of the Cadweld tensile test reports dated around the end of 1975 and the first few months of 1976 existed in duplicate but with signatures or initials which appeared on each copy to be noticeably different. This raised the concern that some of the reports might have been missing and that some of the reports might be manufactured or created and then later reports were found, resulting in nearly dual records.

The NRC staff reviewed NCP W3-7481 and its disposition. It was noted that during the initial construction period at Waterford, there were three companies involved to handle installation and inspection of Cadwelds. J. A. Jones was responsible for installing and cutting out of Cadweld samples identified for testing; Ebasco was responsible for sending the test samples to the testing laboratory; and GEO (the testing laboratory) was responsible for performing the tensile test and recording the test results. When the samples were tested at the test facility the test data, including the technician's initials, were recorded in ink in a bound log book. The test lab personnel then transferred the necessary data to the appropriate form, in this case for Cadweld tests it was Form QC-15 (July 22, 1975). A copy of this form was maintained in the GEO files, and the original was sent to Ebasco for evaluation against the acceptance criteria. As related to the NRC staff, in certain situations it was found that just before the placement of concrete, some of the tensile test reports were either mishandled or even lost, and

duplicate reports were reconstructed. The test data and lab technician's name or initials were purportedly retrieved from GEO's file. Ebasco Quality Assurance (QA) personnel apparently utilized this process to expedite the placement of concrete.

It was explained that at some time later during the construction phase the copies of the original reports were found. J. A. Jones submitted them to Ebasco who in turn submitted the reports back to J. A. Jones for inclusion to their files. This practice resulted in the situation so that there were approximately 70 to 90 incidences where two nearly identical reports existed in the file belonging to the same tested Cadweld sample but with noticeably different signatures or initials.

The NRC staff reviewed the Cadweld records in question and examined both the copies of the original and the reconstruction test reports, as identified in the NCR. There is no technical data, which appears to be different than what was noted to be original test data. The licensee has dispositioned the NCR by identifying the original test reports and the reconstructed reports. The NRC staff also went back to the original test laboratory log book and checked some sample tests. This indicated that the test data (tensile failure load of specimens) were consistent with the reports. The NRC staff concurs with the licensee's disposition and believes that there are no created test reports from the standpoint of test data. There are apparently reports in existence which contain initials not made by the actual individual. This issue of creating a second report from apparently existing data, is being reviewed by the NRC Office of Investigations. If new information is forthcoming from that investigation which impacts on the technical adequacy of the test records, it will be necessary to address those new facts. Based on the existing technical data, it appears that the test records represent the actual load carried by each test specimen.

Potential Violations: There is violation of construction procedure W-SITP-4 and Specification No. LOU-1564.79. There is a violation of 10 CFR 50, Appendix B, Criterion V in that the activities which affect quality and have documented instructions, procedures etc., should be accomplished in accordance with those instructions and procedures.

Actions Required: None.

References

1. NCR W3-7481, dated December 30, 1983.
2. J. A. Jones Procedure No. W-SITP-4, Revision 0, "Reinforcing Steel- Handling, Storage, Installing, Cadwelding and Modification Inspection Procedures," dated October 3, 1975.
3. Ehasco Specification No. LOU-1564.79, Revision 0, "Mechanical Splicing of Concrete Reinforcing Steel," dated March 8, 1974.

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Document Name:

SSER A-147

Requestor's ID:

CONNIE

Author's Name:

Document Comments:

comm from displaywriter 5/29/84