

SSER

Task: Allegation A-147

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

Characterization: It is alleged that Cadweld test reports were "created" to replace lost records. This is evidenced by signatures or initials on Cadweld tensile test reports being noticeably different for the same technician.

Assessment of Allegation: During the Ebasco's quality assurance (QA) review of Cadweld records it was found that some of the Cadweld tensile test reports at the end of 1975 and the beginning of 1976 existed in duplicate but had signatures or initials which were noticeably different. There was concern that some of the original reports might have been missing and that reports had been manufactured to replace the missing records. Later the missing reports were found, resulting in nearly identical records.

The NPC staff reviewed Ebasco Nonconformance Report (NCR) W3-7481 and its disposition. The staff noted that during the initial construction period at Waterford, there were three companies involved with installation and inspection of Cadwelds. J. A. Jones was responsible for installing and cutting out Cadweld samples identified for testing; Ebasco was responsible for sending the test samples to GEO (the testing laboratory) and for evaluating test results; and GEO was responsible for performing the tensile tests, recording the test results, and forwarding them to Ebasco. After the samples were tested at GEO, the test data, including the technician's initials, were recorded in ink in a bound log book. GEO personnel then transferred the necessary data to the appropriate form, in this case Form OC-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 Ebasco found that just before placement of concrete, some of the tensile test reports had been either

mishandled or lost, and that duplicate reports had been constructed. The test data and the lab technician's name or initials were purportedly retrieved from GEO's file at that time. Ebasco QA personnel apparently utilized this retrieval process to expedite the placement of concrete.

The NRC staff learned that at some time later in the construction phase the copies of the original reports were found. J. A. Jones submitted them to Ebasco which in turn submitted the reports back to J. A. Jones for inclusion into their files. This practice resulted in approximately 70 to 90 incidents of two nearly identical reports existing in the file; these identical reports related to the same tested Cadweld sample, but had noticeably different signatures or initials for the same technician.

The NRC staff reviewed the Cadweld records in question and examined both the copies of the original and the reconstructed test reports, as identified in the NCR. The staff found no technical data which was different than that noted to be original test data. LP&L had disposed of the NCR by identifying both the original test reports and the reconstructed reports. The NRC staff referred to the original GEO log book and checked the entries for some sample tests, which indicated that the test data (tensile failure load of specimens) were consistent with the reports.

The NRC staff concurred with LP&L's disposition of the NCR and found no "created" test reports from the standpoint of test data. The staff believes, however, that duplicate, second reports may have existed which contained initials not made by the actual individual. This issue of second reports existing is being reviewed by the NRC Office of Investigations (OI).

Based on the NRC staff's review of existing technical data, the staff concludes that the test records represent the actual load carried by each test specimen and that no test reports were "created" to replace lost records. However, this conclusion is contingent upon the results of OI's investigation, and further technical evaluations may be necessary depending on the outcome of these investigations.

Potential Violations: There is a violation of 10 CFR 50, Appendix B, Criterion V, in that the activities which affect quality and which have documented instructions and procedures should be accomplished in accordance with those instructions and procedures.

Actions Required: None.

References

1. Ebasco 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," October 3, 1975.
3. Ebasco Specification No. LOU-1564.79, Revision 0, "Mechanical Splicing of Concrete Reinforcing Steel," March 8, 1974.
4. Form QC-15.
5. 10 CFR 50 Appendix B Crit V.

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