

SSER

FINAL

Task: Allegation *A-156, A-106, A-108, A-133

Reference No.: 4-84-A-06-1, 4-84-A-06-3, 4-84-A-06-28

Characterization: It has been alleged that J. A. Jones Daily Cadweld Inspection Reports contained inspectors' signatures or initials that were noticeably different. There was a concern that these were forged signatures and initials, leaving the authenticity of these records in question.

Assessment of Allegation: The NRC staff reviewed Nonconformance Report (NCR) W3-6245 which was issued on May 20, 1983 to address discrepancies with the signatures and initials in the Cadweld records. One of the NCR attachments included the records which have the questionable initials. The authenticity of the signatures of five inspectors was under question and is being addressed by the NRC Office of Investigation.

In the initial technical disposition of this NCR, LP&L reviewed the concrete preplacement checklist records and Cadweld location maps to assure that the Cadwelds were installed and inspected as required. The authenticity of the signatures on these records was not questioned or examined at that time. It should be noted that the "Cadweld mapping" according to the project procedure, was used to record verification of the location of each splice, verification of the sizes of the splice bars, and verification of Cadweld identification number (ID), position and splice data.

LP&L, in further attempts to clarify the reasons for occurrences such as discrepant initials, obtained signed statements in January 1984 from the involved inspectors. These statements provided explanations for the appearance of the initials. It appeared that either the original reports were soiled in the field or the inspectors were in a physically awkward inspection position and called out data which was recorded and initialed by a second inspector. The inspectors stated that, when they entered the information onto the Cadweld map, they had to look at each Cadweld number stenciled on the Cadweld sleeve.

These numbers were readily discernible, and acceptable Cadwelds were painted white. The rejected Cadweld sleeves were painted red, while sample Cadwelds selected for testing were painted yellow. Since each Cadweld had to be examined for Cadweld mapping, the color coding scheme made it very unlikely that an unacceptable Cadweld would be left in place.

Based on the NRC staff's evaluation of the disposition of NCR W3-6245 and examination of the concrete preplacement checklist records, the staff believes that the questionable Cadwelds were actually installed and inspected and that no reject or test splices required for testing were left in a placement. The integrity of structures was not in question. The indications were that this was a general practice in the Cadweld splicing area but was assessed as having no safety significance.

It should be noted that the allegor had not questioned the acceptability of the Cadwelds. In a discussion with the staff, the allegor indicated that he was more concerned about the authenticity of the signatures on the inspection forms.

This allegation has neither safety significance nor generic implications.

Potential Violations: The practice of signing or initialling the Cadweld daily inspection report by other than the original inspector is a violation of LP&L Site Inspection and Test Procedure W-SITP-4.

Actions Required: None.

References

1. Procedure No. W-SITP-4, "Reinforcing Steel-Handling, Storage, Installing, Cadwelding and Modification Inspection Procedures." October 13, 1975.
2. Procedure No. W-WP-7, "Concrete Placing, Curing, Finishing, and Repairs."
3. Specification No. LOU-1564-79, "Mechanical Splicing of Concrete Reinforcing Steel," Rev. 0, March 8, 1974.
4. NCR-W3-6245, "J. A. Jones Daily Cadweld Inspection Reports had signatures or initials on the records that are noticeably different," May 20, 1983.

Statement Prepared By: _____
L. Yang Date

N. Chokshi Date

Reviewed By: _____
Team Leader Date

Reviewed By: _____
Site Team Leader(s) Date

Approved By: _____
Task Management Date

SSER

Task: Allegation ~~A-156~~, A-106, A-108, A-133,

Reference No.: 4-84-A-06/1; 4-84-A-06/3; 4-84-A-06/28; 4-84-A-06/51

Characterization: It has been alleged that J. A. Jones Daily Cadweld Inspection Reports contained inspectors' signatures or initials that were noticeably different. There was a concern that these were forged signatures and initials, leaving the authenticity of these records in question.

Assessment of Allegation: The NRC staff reviewed Nonconformance Report (NCR) W3-6245 which was issued on May 20, 1983 to address discrepancies with the signatures and initials in the Cadweld records. One of the NCR attachments included the records which have the questionable initials. The authenticity of the signatures of five inspectors was under question and is being addressed by the NRC Office of Investigation.

In the initial technical disposition of this NCR, LP&L reviewed the concrete replacement checklist records and Cadweld location maps to assure that the Cadwelds were installed and inspected as required. The authenticity of the signatures on these records was not questioned or examined at that time. It should be noted that the "Cadweld mapping" according to the project procedure, was used to record verification of the location of each splice, verification of the sizes of the splice bars, and verification of Cadweld identification number (ID), position and splice data.

LP&L, in further attempts to clarify the reasons for occurrences such as discrepant initials, obtained signed statements in January 1984 from the involved inspectors. These statements provided explanations for the appearance of the initials. It appeared that either the original reports were soiled in the field or the inspectors were in a physically awkward inspection position and called out data which was recorded and initialled by a second inspector. The inspectors stated that, when they entered the information onto the Cadweld map, they had to look at each Cadweld number stenciled on the Cadweld sleeve.

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Based on the NRC staff's evaluation of the disposition of NCR W3-6245 and examination of the concrete preplacement checklist records, the staff believes that the questionable Cadwelds were actually installed and inspected and that no reject or test splices required for testing were left in a placement. The integrity of structures was not in question. The indications were that this was a general practice in the Cadweld splicing area but was assessed as having no safety significance.

It should be noted that the allegor had not questioned the acceptability of the Cadwelds. In a discussion with the staff, the allegor indicated that he was more concerned about the authenticity of the signatures on the inspection forms.

This allegation has neither safety significance nor generic implications.

Potential Violations: The practice of signing or initialling the Cadweld daily inspection report by other than the original inspector is a violation of LP&L Site Inspection and Test Procedure W-SITP-4.

Actions Required: None.

References

1. Procedure No. W-SITP-4, "Reinforcing Steel-Handling, Storage, Installing, Cadwelding and Modification Inspection Procedures." October 13, 1975.
2. Procedure No. W-WP-7, "Concrete Placing, Curing, Finishing, and Repairs."
3. Specification No. LOU-1564-79, "Mechanical Splicing of Concrete Reinforcing Steel," Rev. 0, March 8, 1974.
4. NCR-W3-6245, "J. A. Jones Daily Cadweld Inspection Reports had signatures or initials on the records that are noticeably different," May 20, 1983.

Statement Prepared By: _____
L. Yang Date

N. Chokshi Date

Reviewed By: _____
Team Leader Date

Reviewed By: _____
Site Team Leader(s) Date

Approved By: _____
Task Management Date

FILE

SSER

Task: Allegation A-263

Reference No.: 4-84-A-06/145

Characterization: It is alleged that a Mercury Construction Superintendent did not agree with Mercury audit findings and refused to correct problems identified.

Assessment of Allegation: The allegation ^{was the result of} arose from an audit finding in Mercury Internal Audit No. 12-1-82 (December 12, 1982), which documented that tubing did not have end caps. It was alleged that the Construction Superintendent refused to take corrective action.

The NRC staff reviewed the Mercury audit files and noted that the audit recommendation block had the Construction Superintendent's comment, "Do not agree with your recommendation." The Mercury auditor had also referenced Corrective Action Report (CAR) 124-125, closed out February 27, 1983.

The NRC staff learned that a Mercury Construction Supervisor assigned to the area where end caps were found missing had immediately taken corrective action. His superintendent received the audit finding and noted an additional recommendation made by the Mercury auditor, that supervisors and lead personnel do not adequately instruct and train subordinates in correct interpretation of Mercury procedures and that a lack of enforcement exists. The superintendent disagreed with this additional recommendation, not with the missing end cap problem for which corrective action had already been taken.

The NRC staff determined that the Mercury auditor's finding did not contain sufficient objective evidence to support the auditor's additional recommendation; even though the auditor thought the situation to be true, he did not document his finding. The CAR which the auditor referenced, and which he had included in the audit report, stated that disciplinary action was not appropriately applied or given to personnel; the auditor expected disciplinary action to be taken against certain Mercury construction craft personnel. The NRC staff and the Construction Superintendent agreed that this type of recommendation was not appropriate to include in an audit report. However, the review of the Mercury audit program identified significant problems; see the NRC staff's assessment of Allegation A-48.

This specific allegation regarding the Construction Superintendent's refusal to take corrective action has neither safety significance nor generic implications.

Potential Violations: None.

Actions Required: None.

Dup 85/10/222

have already seen this

References

1. Mercury Audit No. 12-1-82, December 12, 1982, Exhibit 36
2. Mercury CAR No. 125, dated December 2, 1982, subject: Tubing Ends Not Capped per QAM Section 11 and PCP-2040.

Statement Prepared By:

H. Shannon Phillips

Date

Reviewed By:

Team Leader

Date

Reviewed By:

Site Team Leader(s)

Date

Approved By:

Task Management

Date

A-302

FINAL SSER ROUTING

Revision :	0	1	2	3
Denny Crutchfield	WV 7/6			
Jim Gagliardo	WV 7/6			

A-302
REV. 0, 6/28/84

RETYPE REVI (FINAL)

DO NOT REROUTE

WAL 7/10

Document Name:
SSER X A-302

Requestor's ID:
JOYCE

Author's Name:
RFarrell/JHarrison

Document Comments:
A-307, A-303b, A-306s, x

#4 OK

Look of Field notes, type pg 1

ok Does item 4 cover concrete action required

info only

EDN's Voided by clerk via speedy memo.
The 35 EDN's are lost.

EDN issue 4,5 voided sandy source

pg 11 what obstructive evidence talked to Relf

7/3 continue in writing

~~DPC 85/0030141~~

Revision 0
DRAFT 3
6/28/84

SSER

Task: Allegations *A-302; A-307; A-303b; A-306s; A-306x

Reference Nos.: 4-84-A-06/180; 4-84-A-06/185; 4-84-A-06/181b;
4-84-A-06/184s & x

Characterization: The allegation is that lower tier corrective action documents were not being upgraded to NCRs. Also, FCRs, DCNs, and EDNs were issued after-the-fact for nonconformances in lieu of NCRs.

Assessment of Allegation: The implied significance of this allegation is that without proper identification of nonconformances, the proper disposition, timely corrective action, determination of root causes and actions to prevent recurrences cannot be taken; that quality trending cannot be accomplished; and that the requirement of 10 CFR 50 for the reporting of Construction Deficiencies (50.55(e)), cannot occur without the identification provided in an NCR.

This allegation was addressed by an NRC staff review of selected Field Change Requests (FCRs), Design Change Notices (DCNs), and Engineering Deficiency Notices (EDNs). The methodology used in this evaluation included an evaluation of random FCRs, DCNs, and EDNs for the Reactor Coolant, Safety Injection, and Component Cooling Water Systems. Additionally, FCRs, DCNs, and EDNs were selected at random and evaluated from the various document issuance logs. The selected design change documents were then reviewed for content and for the ^{basis} of issuance; that is, for whether they were issued "before-the-fact," as a design change or "after-the-fact," as a nonconformance report. Finally, the staff conducted a system walkdown to verify proper identification and change control completion. The NRC staff also reviewed Tompkins-Beckwith Discrepancy Notices (DNs) for proper review and upgrading to Ebasco Nonconformance Reports (NCRs). This review was conducted by selecting DRs from the DR log and the QA records vault. The NRC staff also reviewed Request For Information (RFI) records and responses to those requests. (Also See Allegation A-187.) The following is a summary of the NRC review

Field Change Requests (FCRs)

The NRC staff reviewed 63 FCRs and 21 revisions to those FCRs. Of the 63 FCRs reviewed, 35 clearly should have been NCRs (55%). An additional four may have reflected conditions that warranted an NCR, for a total of 39 (61%). Ebasco procedure ASP-1-4, Design Control dated June 7, 1983, states in paragraph 6.1.4, "FCRs shall not be generated in place of nonconformance reports." The practice of issuing FCRs in lieu of NCRs not only occurred in the past but continued during the staff review, as in the following examples:

1. F-MP-1818 (May 25, 1984). Miscellaneous piping; incorrect weld rod was used; the weld was removed and replaced with correct material.
Contractor - T-B.
2. F-AS-3698 (January 6, 1984). Reactor Coolant (RC) Pipe Seismic Support; bolts and embed documentation changed to reflect as-built.
Contractor - NISCO.
3. F-AS-3648 (December 2, 1983). Miscellaneous pipe supports; changed drawings to reflect as-built embed plate size and weld size.
Contractor-not indicated.
4. F-AS-2338 (February 2, 1982). RC supports; unacceptable weld gap between beam and embed, because embed was cut too short; disposition was to change design; seismic review may be required.
Contractor - NISCO.
5. F-MP-1434 (February 8, 1981). RC spool piece installed backwards in pipe chase; disposition was to leave as installed.
Contractor-unknown.