

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-249/86018(DRS)

Docket No. 50-249

License No. DPR-25

Licensee: Commonwealth Edison Company
P.O. Box 767
Chicago, IL 60690

Facility Name: Dresden Station, Unit 3

Inspection At: Dresden Site, Morris, IL

Inspection Conducted: June 2-4, 1986

Inspector: *W. J. Key*
W. J. Key

7/1/86
Date

Approved By: *D. H. Danielson*
D. H. Danielson, Chief
Materials and Processes Section

7/1/86
Date

Inspection Summary

Inspection on June 2-4, 1986 (Report No. 50-249/86018(DRS))

Areas Inspected: Unannounced, special inspection of allegations.

Results: No violations or deviations were identified.

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DETAILS

1. Persons Contacted

Commonwealth Edison Company (CECo)

*D. Scott, Station Manager
*D. Brown, RPR QA Supervisor

United States Testing Company (UST)

R. Sweet, Site Project Manager
W. Penney, Site QA Representative

*Denotes those attending the exit meeting.

2. Followup on Allegations

(Closed) Allegation No. RIII-86-A-0075

On April 28, 1986, an anonymous caller contacted the NRC Dresden Resident office stating that, "An inspector for U.S. Testing (Name Given) is leaving the site tomorrow and has been qualifying other inspectors as Level III ANSI inspectors. This is so these men could get better jobs when they leave Dresden."

On May 13, 1986, the anonymous individual contacted the Region III office by phone and provided the following information:

- o On approximately April 29, 1986, the U.S. Testing Inspection Supervisor at Dresden Station, told five U.S. Testing Inspectors, "if anybody ever goes to the NRC you'll never work for the company again." The anonymous caller would not identify the five inspectors involved in this meeting.

Immediately after the meeting with the Supervisor, someone (he did not know whom) contacted the U.S. Testing home office in Hoboken, New Jersey, and complained that the Supervisor would not allow them to have direct access to the NRC. The home office in turn contacted the U.S. Testing Company Manager at Dresden, and asked the Manager to investigate the allegation against the Supervisor. The Manager called the five inspectors into his office and each stated that the Supervisor had made the threat. The allegor stated that the Manager ended the meeting by stating, "they'd be blackballed if they went to the NRC."

On May 9, 1986, the Manager met with the day and night shift inspection staffs in two separate meetings. According to the anonymous caller, the Manager stated, "too many people were going to

the NRC and all that will do is get you in trouble." The Manager was also quoted as stating, "go through channels or you'll be in big trouble." The anonymous caller also stated that the Manager "read from the NRC wall chart," and said "it says right here that you have to go to your supervisor."

The anonymous individual went on to discuss his original concern which was the improper certification of U.S. Testing visual inspectors. The individual stated that the U.S. Testing Supervisor was now doing the certifications and he too was basing the certifications on a proficiency test instead of considering previous work experience. He stated that the process had now extended to the certification of Level II inspectors and gave (named individual) as an example. According to the individual, the named individual had an extensive background in radiographic and dye penetrant testing, but had never done a visual inspection.

According to the anonymous individual, the American Welding Society has taken a position that nondestructive examination personnel were technicians and were not considered to be inspectors. Therefore, they did not have any previous inspection experience. The individual stated that most of the nondestructive examination technicians who U.S. Testing certified as Level II or Level III visual inspectors "have never handled prints, they can't read weld symbols."

The individual stated that he planned to contact Walter Shewski of the Commonwealth Edison Quality Assurance Department and inform Shewski of the above concerns. The individual stated that he had obtained a copy of a Document of Qualifications (DOQ) for a recently certified Level III inspector. According to the individual, this DOQ showed that all of the Level III inspector's experience came from a background in nondestructive examinations and none from visual inspections. The individual stated that he had retrieved the copy of the DOQ from a secretary's waste can and he would send it to Shewski. He also stated that he preferred to send it to Shewski, rather than the NRC, so that Commonwealth Edison would have the opportunity to resolve his concerns before he contacted the Chicago Tribune.

NRC Review

The NRC inspector reviewed the UST Administration procedures identified below for certification of NDE technicians and ANSI N45.2.6 inspectors.

- ° Procedure No. 2.3.2, Revision 0
Qualification and Certification of ANSI Inspection
Examination and Test Personnel
- ° Procedure No. 2.3.1, Revision 0
Qualification and Certification of NDE Personnel

The NRC inspector also contacted the licensee's RPR Quality Assurance Supervisor to determine what action they had taken related to these allegations, and was informed that U.S. Testing (UST) had conducted an audit of site activities (Audit Report No. 1151/421.1) on April 17-18, 1986. No problems were identified during this audit. The U.S. Testing site manager was instructed to conduct an investigation into the allegations following a phone call from a former Dresden employee to the UST corporate office. The NRC inspector reviewed the results of this investigation and interviewed the UST site manager, Mr. Randy Sweet. He stated that one inspector named by the caller was certified as an ANSI N45.2.6 Level III inspector prior to reporting onsite, and this inspector was reevaluated after arrival. That inspector was the only ANSI N45.2.6 Level III inspector on this job. He performed very few inspections; his duties were mostly as a technical advisor.

That inspector (the Level III) did in fact qualify inspectors in accordance with UST procedures by completing a Document of Qualification (DOQ) for each inspector to verify inspector training and experience for certification. These forms were completed for inspectors by the UST site managers and forwarded to the UST corporate office for review and approval. No UST site manager has authority to approve a DOQ to certify personnel. Personnel arriving onsite are certified by the UST corporate office as ANSI N45.2.6 Level I, II, or III inspectors. However, because of the difference in procedures for each site, each inspector is trained and certified to the site specific procedures prior to performing any inspections. The DOQ is filled out for each inspector at each site to document the inspectors qualifications for each level of certification. The DOQ is maintained in the inspectors certification package to identify the disciplines for which he is qualified to inspect in.

The NRC inspector interviewed 8 of the 14 UST inspectors who were onsite. Of the UST inspectors interviewed by the NRC inspector one stated that the named inspector had certified three NDE Technicians; the U.S. Testing site manager, site supervisor and one other individual and, that all three are SNT-TC-1A certified Level III inspectors. UST has a policy of cross training their inspectors in accordance with SNT-TC-1A and ANSI N45.2.6 requirements. The ANSI N45.2.6 qualifications are documented on the DOQ. All other inspectors interviewed said they had only heard that the named inspector had qualified other inspectors but they had no first hand knowledge of this.

The NRC inspector found no evidence to indicate that the site supervisor has certified any inspectors. He is the UST site QA representative, and since the named inspector's departure has been responsible for documenting the inspector training and qualifications received on the job.

The NRC inspector interviewed the site supervisor who denied making the statement, "if anybody ever goes to the NRC you'll never work for the company again," during a meeting with the inspectors. He stated that his statement was taken out of context, that he was trying to tell the inspectors to follow procedures by going through management before contacting the NRC.

The UST site manager was made aware of this allegation after an inspector, who had quit and left the site, called the corporate personnel office informing them that during his employment at Dresden Station he overheard the site supervisor say "If you go to the NRC with a problem you will never work for UST again." After this telephone call, on April 29, 1986, the site manager was instructed by the UST corporate office to look into the allegation.

The NRC inspector interviewed the site manager who stated that he had a meeting with the site supervisor who denied making the statement, that his words had been taken out of context. The message he was trying to get across was "if anyone has a concern or problem they need to go through the proper channels first." The site manager said he told the site supervisor to be very careful with his choice of words when explaining to inspectors the proper way to report concerns, and that it was not the Dresden site's nor U.S. Testing's policy to prevent anyone from contacting the NRC. The site manager met with the five involved inspectors who stated that the site supervisor did make a statement similar to the one quoted. One inspector stated that the statement was directed to him.

On May 9, 1986, the site manager assembled the day shift inspectors and informed them of the Dresden site's policy and UST's policy for reporting concerns to the NRC and directed them to the NRC Form 3. He did the same with his second shift inspectors.

The site manager stated that he told his employees if they had any problems they should make them known to UST management prior to contacting the NRC to afford them the opportunity to make any needed corrections, and that if they still were not satisfied he would go with them to the NRC. He encouraged them to not constantly threaten to go to the NRC.

During the NRC inspector's interview of the eight UST inspectors, they were asked if they heard the site supervisor make the statement attributed to him. All but one stated that either they had not heard him make such a statement or that they had heard from another inspector that he had made the statement.

One inspector stated that he heard the site supervisor make the statement. He also indicated that the site manager stated that personnel could be "blackballed for going to the NRC," but that this was a general statement, not directed to anyone. All inspectors stated that the site supervisor and the site manager told them that any inspectors having concerns should bring them to the supervisors and try settling them within the company.

The NRC inspector reviewed the qualification/certification records of the UST personnel identified below:

- ° Individual A, SNT-TC-1A, NDE Level III, RT, PT, MT, UT. Not certified to ANSI-N45.2.6.

- Individual B, SNT-TC-1A, NDE Level III, RT, PT, MT, UT. Not certified to ANSI N45.2.6.
- Individual C, ANSI-N45.2.6 Level II, visual. DOQ signed by K. Massey, certified by C. D. Johnson (Corporate).
- Individual D, SNT-TC-1A, NDE Level II, MT, PT. Not certified to ANSI N45.2.6. DOQ signed by K. Massey verifying training received at Dresden Station.
- Individual E, NDE Level II, RT, MT, PT, UT. Not certified to ANSI N45.2.6. DOQ signed by K. Massey and J. Siska verifying training received at Dresden Station.
- Individual F, ANSI N45.2.6 Level III visual. DOQ verifies qualifications for certification. Certified by C. D. Johnson (Corporate).

Conclusion

The NRC inspector has determined from his review of personnel certification/qualification records, U.S. Testing procedures, and personnel interviews that no ANSI N45.2.6 Level III visual inspectors were certified by Mr. Ken Massey or Mr. Wayne Penney while they were at Dresden Station. Mr. Massey was documenting on the DOQ the training and qualifications of UST inspectors in accordance with UST to Dresden site specific procedures.

The allegation that Mr. Massey was certifying ANSI N45.2.6 Level III inspectors was not substantiated. While Mr. Penney may have made a statement similar to the one alleged, which may have been taken out of context, there is no evidence to substantiate that this statement as stated was in fact made.

3. Exit Meeting

The inspector met with licensee site representatives (denoted in Persons Contacted paragraph) at the conclusion of the inspection. The inspector summarized the scope and findings of the inspection. The inspector also discussed the likely informational content of the inspection report with regard to documents or processes reviewed by the inspector during the inspection. The licensee did not identify any such documents or processes as proprietary.