

APPENDIX

U. S. NUCLEAR REGULATORY COMMISSION

Region IV

Investigation Report No. 50-382/81-21

Docket No. 50-382

Licensee: Louisiana Power and Light Company
142 Delaronde Street
New Orleans, LA 70174

Facility: Waterford Steam Electric Station, Unit 3

Investigation at: Waterford site, Taft, Louisiana

Investigation Conducted: August 13, October 21-22, 1981

Investigator:

D. D. Driskill
D. D. Driskill, Investigator
Investigation and Enforcement Staff

1-15-82
Date

R. K. Herr
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1/22/82
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1/25/82
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Summary

Investigation on August 13, and October 21-22, 1981 (Report No. 50-382/81-21).

Area Investigated

Allegations were presented to the NRC that Tompkins-Beckwith, Incorporated (TBI) QC personnel were obtaining copies of the level II quality control certification examinations prior to their taking the certification examinations; that required minimum on-job-training record (OJT) for QC inspectors were being falsified; and that quality control inspectors were not allowed to submit NCR's. This investigation involved 22 hours by one NRC Investigator.

Results

Investigation identified no TBI personnel who obtained questions and answers for quality control certification examinations prior to testing, and it also disclosed that use of new certification examinations had been initiated to insure the integrity of the testing process. Review of TBI records disclosed no minimum OJT requirements for quality control personnel existed, contrary to what was alleged; therefore, falsification of individual OJT records would serve no meaningful purpose. Interviews disclosed no known improprieties relating to the TBI Quality Control Department OJT Program. A review of TBI Nonconformance Report procedures disclosed that QC inspectors were required to prepare a Discrepancy Notice upon identification of any discrepant or nonconforming conditions and that the TBI QC Engineer then evaluated each and prepared an NCR, if appropriate.

Introduction

The Waterford Plant, Unit No. 3 is under construction near the town of Taft, Louisiana. Louisiana Power and Light is the construction permit holder. Ebasco Services Incorporated is both architect/engineer and construction manager for the plant.

Reason for Investigation

On August 13, 1981, Individual A was interviewed and stated that during recent months some TBI QC personnel had been obtaining copies of the TBI level II quality control certification examinations prior to their taking the test. He also stated that he believed OJT records for some TBI QC personnel were being falsified to facilitate a more rapid eligibility for promotion. Lastly, Individual A stated that TBI QC inspectors were not allowed to write NCR's regarding nonconforming conditions which they identified during the course of their duties at the Waterford site.

Details1. Persons ContactedTompkins-Beckwith, Incorporated

Anthony Orsini, Assistant Vice President

Others

Individuals A through J

2. Investigation of AllegationsAllegation No. 1

Some TBI QC inspectors are obtaining copies of level II QC certification examinations prior to their being tested and OJT records for some TBI QC inspectors are being falsified to facilitate a more rapid certification.

Investigative Findings

On August 13, 1981, Individual A was interviewed. Individual A stated that some TBI level I QC inspectors are obtaining copies of the TBI Mechanical QC level II examination and the Welding QC level II examination prior to their taking the written examination. Individual A stated this compromised the purpose of the written examination. Individual A also stated that he believed that OJT records for some TBI level I QC inspectors were being falsified to expedite their eligibility for certification as a level II QC inspector. Individual A stated that 80 hours of OJT are required prior to an individual's being eligible to take a level II QC inspector's certification examination.

Interview of QA Supervisor

On October 21, 1981, Individual B, the TBI QA employee was interviewed. Individual B stated that TBI procedures provide for a complete training and indoctrination of QC personnel, prior to their certification, which includes a period of OJT. Individual B stated no specific number of hours of OJT was required and that a person's eligibility for taking a QC certification exam was based on the judgment of training personnel's recognition that the person was knowledgeable and proficient enough to function at the QC level being sought. Individual B stated no inaccurate data were placed in a person's training record and that falsification of an OJT record would serve no purpose due to there being no stated minimum OJT requirements. Individual B stated that he was unaware of any person's having

ever received a copy of a QC certification exam prior to his/her taking the examination. Individual B also stated almost every QC inspector employed by TBI has prior QC experience and that falsification of training records and/or providing advance information regarding the certification exams would, in virtually every case, not be necessary to effect certification of personnel.

Review of TBI Procedure

On October 21, 1981, Tompkins-Beckwith Procedure 4, entitled "Indoctrination, Training, and Certification of QA/QC Personnel," was reviewed. TBP-4 was found to provide for OJT for QC personnel and documentation of an individual's OJT in this training record. It was noted that no specific minimum time requirements for OJT were stated. TBP-4 also requires that each QC inspector attend training classes and that a written certification exam be administered to determine the individual's comprehension and understanding of the subject matter, prior to certification.

Interview of QC Inspectors

On October 21-22, 1981, Individuals C, D, E, F, G, H, and I, all TBI level II QC inspectors, were interviewed. The interviews were unproductive in identifying any impropriety or adverse information concerning TBI level II QC certification examinations. All stated they performed OJT prior to and during training and certification for their current jobs. All stated they felt the TBI QC certification training program was adequate.

Interview of QC Engineer

On October 22, 1981, Individual J, the TBI QC employee was interviewed. Individual J stated that he had been the QC engineer since July 8, 1981. Individual J stated that upon his accepting his position he had surveyed the personnel and training records of all TBI QC personnel. He stated his review of QC personnel's comprehensive certification examinations disclosed they were consistently obtaining high scores and he assumed that a general familiarity with the questions on these exams was partially responsible for the high scores. Individual J stated he had recently rewritten the level II certification exams to increase the effectiveness of the exams and to reflect some recent revisions to TBI QC procedures. Individual J stated he had no information supporting an allegation that certification exams were being obtained by or provided to TBI personnel prior to the examination's being administered. He stated that close control of current examinations was now in effect to preclude compromise of this nature. Individual J stated he had also restructured the QC certification training program to include daily academic study in conjunction with OJT to increase comprehension of material. Individual J stated that he believed the training program was effective in producing well qualified QC inspectors.

Allegation No 2

TBI QC inspectors were not allowed to submit NCR's on nonconforming conditions identified during the course of duties at Waterford site.

Investigative Findings

On August 6, 1981, Individual A was interviewed and stated that TBI QC inspectors were not allowed to submit NCR's on nonconforming conditions which were identified. Individual A stated the only person in the TBI organization who could write NCR's was the QA supervisor.

Interview of QA Supervisor

On October 21, 1981, Individual B was interviewed. In response to the allegation being presented, Individual B stated the allegation was partially true. He stated the TBI procedure, TBP-12 entitled "Nonconformances and Discrepancies," provides definitions for both "discrepancies" and "nonconformances." He stated it was the responsibility of the QC inspector to prepare a Discrepancy Notice whenever a discrepancy or nonconformance was identified during the course of their duties. All Discrepancy Notices then were reviewed by the QC engineer who makes the determination whether the submitted Discrepancy Notice should be reported to the Ebasco Project Engineer on a Nonconformance Report for approval of the recommended disposition. Individual B stated this method of implementation of NCR's was specifically stated in TBP-12 which was approved by Louisiana Power and Light Company.

Review of TBP-12

On October 21, 1981, TBP-12 was reviewed. The procedure states the TBI Quality Control Engineer is responsible for evaluating each Discrepancy Notice and preparing a nonconformance report when conditions, specified in the procedure, dictate. The procedure additionally provides for a review and approval of each Nonconformance Report by the TBI QA supervisor. TBP-12 provides specific instructions for each TBI QC inspector's reporting of discrepancies and nonconformances on a Discrepancy Notice which is subsequently forwarded to the Quality Control Engineer for further evaluation and approval.