

CP&L

Carolina Power & Light Company

June 1, 1982

USNRC REGION II
ATLANTA, GEORGIA

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Mr. James P. O'Reilly
United States Nuclear Regulatory Commission
Region II
101 Marietta Street, Northwest
Atlanta, Georgia 30303

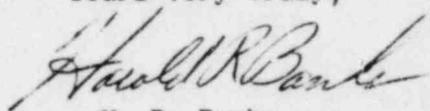
Dear Mr. O'Reilly:

In reference to your letter of April 28, 1982, referring to RII: JYV 50-400/401/82-03, the attached is Carolina Power & Light Company's reply to the deficiencies identified in Appendix A.

It is considered that the corrective and preventive actions taken will be satisfactory for resolution of these items, once completed.

Thank you for your consideration in this matter.

Yours very truly,



H. R. Banks
Manager

Corporate Quality Assurance

NJC:jp

Attachment

cc: Mr. J. A. Jones

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Q PDR

Severity Level IV Violations

- A. 10 CFR 50, Appendix B, Criterion XVIII, as implemented by section 1.8.5.17 of the PSAR, require that inspection records identify the individuals who performed the inspection.

Contrary to the above, a welding inspector signed inspection records indicating he had inspected welds and found them acceptable when, in fact, the welds had been inspected by other individuals and he had not personally inspected the welds.

- B. 10 CFR 50, Appendix B, Criterion II, as implemented by section 1.4.9 (1.58) of the PSAR requires the licensee to comply with ANSI N45.2.6-1973.

Contrary to the above, the licensee did not comply with section 2.2 of ANSI N45.2.6-1973 in that two individuals performed weld inspections before they were certified by the licensee as being qualified to perform the assigned work.

Denial or Admission and Reasons for Violations:

- A. The violation is correct as stated. The inspector in question (Inspector A) when questioned, admitted that he did not reinspect each weld inspected by trainees under his supervision. The inspector further stated that he had worked with the trainees and had reinspected their work until he was satisfied that they were capable of performing the inspections satisfactorily. He admitted that he signed inspection records for which the trainees had actually performed the inspections, but stated he was confident that the inspections were performed correctly. He felt there was nothing wrong with him signing the inspection records since the trainees were under his supervision.

Further investigation revealed that Inspector A, while in the process of reviewing daily weld inspection records for seismic pipe hangers, had routinely taken it upon himself to print the inspector's initials on the record when the inspector who had performed the inspection had failed to do so. Inspector A readily admitted this, on a one case basis, when confronted with a weld inspection record on which the inspector's initials were questionable. He later admitted to having done this routinely when several additional examples were found. He stated that he saw nothing wrong with this practice since he knew which inspectors had actually performed the inspections. He further stated that he had not intended to forge the initials, but merely indicate who had done the inspection. He indicated that he intended to get the appropriate inspectors to initial the records later, but just hadn't found time to do it. Investigation found that the various initials allegedly printed by Inspector A have little resemblance to initials written by the inspectors in question. (At this point in our investigation, Inspector A left CP&L employment for a position elsewhere.)

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Having determined that Inspector A had, at least, used poor judgement in his handling of trainees' inspections and using other inspectors' initials on records, a detailed review of all seismic pipe hanger weld records (WDR's) processed by Inspector A was conducted. Findings are as follows:

1. Inspector A inserted initials of other inspectors on WDR's (a total of 12 WDR's).
2. Inspector A inserted his own initials on WDR's for hanger welds which had been inspected by other inspectors (not trainees).
3. Inspector A indicated acceptance of hanger welds on WDR's by inserting another inspector's initials for welds which had been previously rejected by that inspector without evidence of rework and reinspection (1 WDR).

B. The violation is admitted with the following clarification:

The two individuals in question (Inspector B and Inspector C) did, in fact, perform weld inspections prior to being certified as being qualified to perform that function. However, these inspections were performed under the direct supervision of a qualified inspector (Inspector A) who maintained himself in the immediate vicinity and who assumed responsibility for the inspections by affixing his own initials on the weld inspection reports.

Site QA procedure CQA-1, Personnel Training and Qualification, paragraph 7.1 states in part: "As the inspector in training develops proficiency, he may be allowed to perform certain functions with minimal supervision; however, he will not be permitted to sign-off holdpoints in verification of quality requirements for work activities." CP&L investigation into this matter clearly indicates that inspectors A, B and C, in their respective roles, felt they were in full compliance with procedure requirements.

Corrective Steps Taken and Results Achieved:

A. In the case of the stated violation which involved Inspector A indicating he had inspected welds when, in fact, the welds had been inspected by other individuals (trainees under his supervision), corrective action is as described for item B below. Corrective action for the additional findings of our investigation are as follows:

1. Where Inspector A inserted the initials of other inspectors:
 - (a) The inspection was verified by the inspector's initials on either the working copy of the WDR or the Inspection Request form for 5 of the 12 WDR's in question. The appropriate inspector initialled and dated the WDR.

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- (b) Those hangers for which the inspection cannot be verified by the working copy of the WDR or the Inspection request form will be reinspected and a new WDR generated.
- 2. Where Inspector A inserted his own initials for inspections performed by other inspectors:
 - (a) If the inspector is still on the job and his inspection can be verified by his initials on the working copy of the WDR or the Inspection Request form, the inspector will initial and date the WDR.
 - (b) If the inspector is no longer on the job or his inspection cannot be verified by the working copy of the WDR or the Inspection Request form, the hanger will be reinspected and a new WDR generated.
- 3. Where Inspector A indicated acceptance of welds by inserting the initials of another inspector for welds previously rejected by that inspector (no evidence of rework and reinspection):

Hanger was reinspected and rejected pending rework. Appropriate entries were made on the WDR.

- B. CP&L was able to verify that Inspector A had not reinspected each weld inspected by Inspectors B & C while in trainee status. We have determined that Inspector B was a trainee under Inspector A from October 13, 1980 to February 17, 1981 and that Inspector C was a trainee under Inspector A from September 8, 1981 to November 16, 1981.

We have identified those hangers "signed off" by Inspector A during those periods which, by virtue of location or interference, would have been difficult to inspect (approximately 200 hangers) and are in the process of reinspecting the field welds. Weld deficiencies found will be handled as nonconformances. This effort is expected to be complete by August 1, 1982.

Corrective Steps Taken to Avoid Further Noncompliance:

- A. Inspection personnel have been reinstructed in the seriousness of signing or initialling for work not performed by themselves and for the use of another inspector's name or initials on inspection records.
- B. Procedure CQA-1, paragraph 7.1 has been revised, in part, to read: "As the inspector in training develops proficiency, he may be allowed to perform certain inspection functions under the supervision of a qualified inspector; however, the qualified inspector is responsible for reinspection to the extent necessary to verify the accuracy of the trainee's inspection". This procedure revision is in the review process and is expected to be issued by June 1, 1982. Inspection personnel have been reinstructed as to their responsibilities relative to reinspecting work done by trainees prior to "signing-off".

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Date When Full Compliance Will Be Achieved:

- A. Full compliance will be achieved by September 1, 1982.
- B. Full compliance will be achieved by August 1, 1982.

Note: There are two minor errors in IE Report No. 50-400/82-03 and 50-401/82-03:

- 1. On page I-2 of the report under CONCLUSIONS:
Item 1 should read "uncertified welding inspectors" rather than "uncertified welders".
- 2. On page II-2 of the DETAILS OF INVESTIGATION:
B. L. Holcombe is not a Welding Engineer. He is a Welding Supervisor.