



CUSTOM METAL FABRICATION

August 2, 1982

U.S.N.R.C. Region III Office  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Attn: Mr. J. G. Keppler

Re: Telecon of July 29, 1982 to Mr. Robert Walker  
at 4:20 P.M.

Subject: Potential 10CFR21 - Weld Records

Gentlemen:

This letter is to confirm the verbal telephone report given by Mr. D. E. Calkins, Manager of Engineering for the Zack Company on Thursday, July 29, 1982 at 4:20 P.M. to Mr. Robert Walker at the Region III, Glen Ellyn offices of the Nuclear Regulatory Commission.

The attached report and corrective action plan has been prepared by Mr. Martin Skates, Quality Assurance Manager, as my designee for all Zack Company quality related matters.

During the course of an existing internal Zack Company investigation, initiated by the Zack Company officers, a box of paperwork was observed being taken to the trash by a plant employee. The company maintenance man brought the documents to the attention of Zack management.

A preliminary review of the documents (see attached report for details) indicates a possible discrepancy between the welder of record and the welder who may have actually performed the welds.

This potential discrepancy is still in the process of being fully investigated, but the initial indications are that it could have occurred during the 1977 to 1981 time frame.

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The Zack Company has initiated and is still in the process of conducting a full scale investigation of this potential discrepancy. However, in an attempt to keep all relevant information open and available to the appropriate parties, the Zack Company is initiating this potential 10CFR21 before it has been determined that a deficiency does exist.

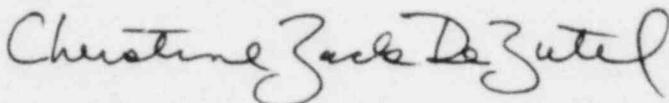
By copy of this letter and the attached report the Zack Company is also confirming the verbal notifications given to the effected utilities.

The Zack Company will cooperate with the Nuclear Regulatory Commission and the respective utilities to the fullest degree possible in the performance of this investigation and its closure.

Should you have any questions or problems concerning this matter, please do not hesitate to contact me or Mr. Martin Skates at (312) 242-3434.

Very truly yours,

THE ZACK COMPANY



CHRISTINE ZACK DE ZUTEL,  
PRESIDENT

CZDZ/art

Encl.

cc: Mr. William Harrington  
Baldwin Associates  
Mr. L. E. Davis  
Bechtel Power Company  
Mr. Dan L. Shamblin  
Commonwealth Edison Company

THE ZACK COMPANY

POTENTIAL 10 CFR21

REPORTABLE DEFICIENCY EVALUATION

FOR

ACCURACY OF WELDER RECORDS

PREPARED BY: David E. Calkins 8/2/82  
David E. Calkins, Manager Engineering

REVIEWED BY: M. L. Skates 8/2/82  
M. L. Skates, Manager Quality Assurance

APPROVED BY: Christine Zack DeZute 8-2-82  
Christine Zack DeZute, President

1.0 Notification:

- 1.1 The Zack Company in accordance with the intent of the reportability requirements within the Code of Federal Regulations, is reporting a Potential 10CFR21 condition relating to a possible discrepancy in the documentation that reflects the welder of record and the welder who may have actually performed the welds.
- 1.2 This report constitutes the Zack Company's official written notification of a Potential 10CFR21 condition and confirms our verbal notification on Thursday, July 27, 1982 at 4:20 PM to Mr. Roger Walker at the Region III Glen Ellyn Offices of the Nuclear Regulatory Commission.

The information relative to this report was obtained Tuesday, July 27, 1982.

The maintenance man observed a box of paperwork being taken to the trash by a plant employee. The maintenance man checked with management to see if the documents should be kept. A review of some of the documents raised questions about welding documentation.

2.0 Identification:

The possible deficiency being investigated is that certain working copies of the shop travelers were obtained and that these copies were compared against the official quality record copies. A possible discrepancy exists between certain information contained on the working copy versus the Q.A. record copy.

The components involved are ductwork (geometrically shaped sheet metal) and hangers (structural steel support members) shipped to the following nuclear facilities:

1. LaSalle Nuclear Power Station  
Marseilles, Illinois
2. Clinton Power Station  
Clinton, Illinois
3. Midland Power Station  
Midland, Michigan

2.2 The work being reviewed for a potential discrepancy by the Zack Company is limited to work performed at its Cicero, Illinois and Chicago, Illinois facilities.

3.0 Potential Deficiency Discription:

3.1 The Zack Company utilizes a traveler system to fabricate the components and to record as built, as welded conditions and as inspected verifications. Certain "working" copies (photocopies) of the official travelers utilized by the production tradesmen contain the initials of various tradesmen who apparently performed some function on that component. Relevant information (i.e. welders numbers, material identification, etc.) was then transferred to the official copy (original traveler). The initial review of the working copies of certain travelers indicates that they contain inconsistencies. The Zack Company is in the process of trying to determine if the initials of a welder on the working copy indicate that the individual actually welded on the component, or whether they represent some other function he performed.

4.0 Action Taken To Date:

The Zack Company has initiated the following actions in an effort to determine the ramifications of, the validity of the inconsistencies and the possible safety implications, if any.

- 4.1 The Zack Company has initiated an investigation into the authenticity and validity of the information, the basis for the accumulation for the information, and the reason the information was being discarded.
- 4.2 The individual discarding the box of paperwork (working copies of certain travelers) has been suspended for thirty days pending the results of the Zack investigation.
- 4.3 Pinkerton Security service was obtained to provide 24 hour surveillance of all Zack records to provide assurance that no relevant documents would leave the premises.
- 4.4 The Zack Company has also initiated the gathering of the following types of information to substantiate the quality records and provide the information necessary to determine whether a safety problem exists or not
  - Payroll records will be used to validate time frames welders worked.
  - Validation that all welders available were qualified and certified to perform work.
  - Validating the other inspections performed (i.e. shop, site, client).
  - Obtaining additional clarification relevant to the meaning of information on working copies (photocopies) from available personnel. This information could be obtained in form of telephone conversations, statements, etc.
- 4.5 A management directive has been issued to all Zack Company employees regarding the disposal of documents.

5.0 Corrective Action Plan:

- 5.1 To do a full scale investigation of Safety Related Travelers, Weld Wire Issue Slips, Welder Qualifications and Shipments Packages corresponding to the working copies of travelers obtained for the time frame of 1977 through 1981 on the LaSalle Power Station, Midland Power Station and the Clinton Power Station.
- 5.2 As additional temporary surveillance program to verify the identification of the record of welders will be established to substantiate that correct welder identifications are transposed to the record documents.
- 5.3 To bring in-house, additional qualified personnel to assist in the investigation.
- 5.4 To submit a final report to the N.R.C. by August 31, 1982.

LaSalle Project - 3300

Traveler Information:

1. The yellow traveler is the Quality Control Document that is maintained as a part of Zack's permanent records system for final turnover, also for the Quality Control Inspector verification.
2. The white traveler was a copy of the yellow traveler used by the shop fabrication foremen to record as-built or as-welded conditions during actual fabrication.

A review of one hundred and seventy yellow and white safety-related shop travelers has revealed the following conditions;

- A. Category-I, Seventeen (17) travelers shows the yellow travelers and the white travelers reveals the same welder information.
- B. Category-II, Thirty-eight (38) travelers shows the white traveler contains more welder identification than the yellow traveler.
- C. Category-III, Fifty-eight (58) white travelers shows different welder identification than the yellow traveler.
- D. Category-IV, Fifty-seven (57) yellow travelers shows more welder identifications than white traveler.

Midland Project - 2400

Traveler Information;

1. The yellow traveler is the Quality Control Document that is maintained as a part of Zack's permanent system for final turnover, also used for the Quality Control Inspectors verifications.
2. The white traveler was a copy of the yellow traveler used by the shop fabrication foreman to record as-built or as-welded conditions, during actual fabrication.

A review of nine hundred and fifty-one safety-related shop travelers has revealed the following conditions at this time;

- A. Six hundred and eighty-one (681) travelers shows the yellow travelers and the white travelers reveals the same welder information.
- B. One hundred and thirty (130) travelers shows the white travelers contains more welder identifications than the yellow traveler.
- C. One hundred and forty (140) travelers show unverified welder qualification at the time of issue on the travelers.

Clinton Project - 2900

Traveler Information:

1. The yellow traveler is the Quality Control Document that is maintained as a part of Zack's permanent system for final turnover, also used for the Quality Control Inspectors verifications.
2. The white traveler was a copy of the yellow traveler used by the shop fabrication foreman to record as-built or as-welded conditions, during actual fabrication.

A review of eleven hundred and sixty-six (1166) safety-related shop travelers has revealed the following conditions at this time:

- A. Seven Hundred and twenty (720) travelers shows the yellow travelers and the white travelers reveals the same welder information.
- B. One Hundred and sixty-two (162) travelers show the white traveler contains more welder identifications than the yellow traveler.
- C. Two Hundred and eighty-four (284) travelers show unverified welder qualification at the time of issue dates on the travelers.