STATION LETTER

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Independence and separation between Kaiser Construction and Kaiser 04/06

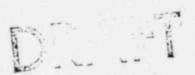
REVENUE

Kaiser Engineers Inc. (RJK Co.) has restructured its Corporate Organization as of 4/1/81. (See atlached chart). A significant change is that the Manager of Corporate Quality Assurance now reports directly to the President. This change reinforces the independence and separation of QA/UC from Construction.

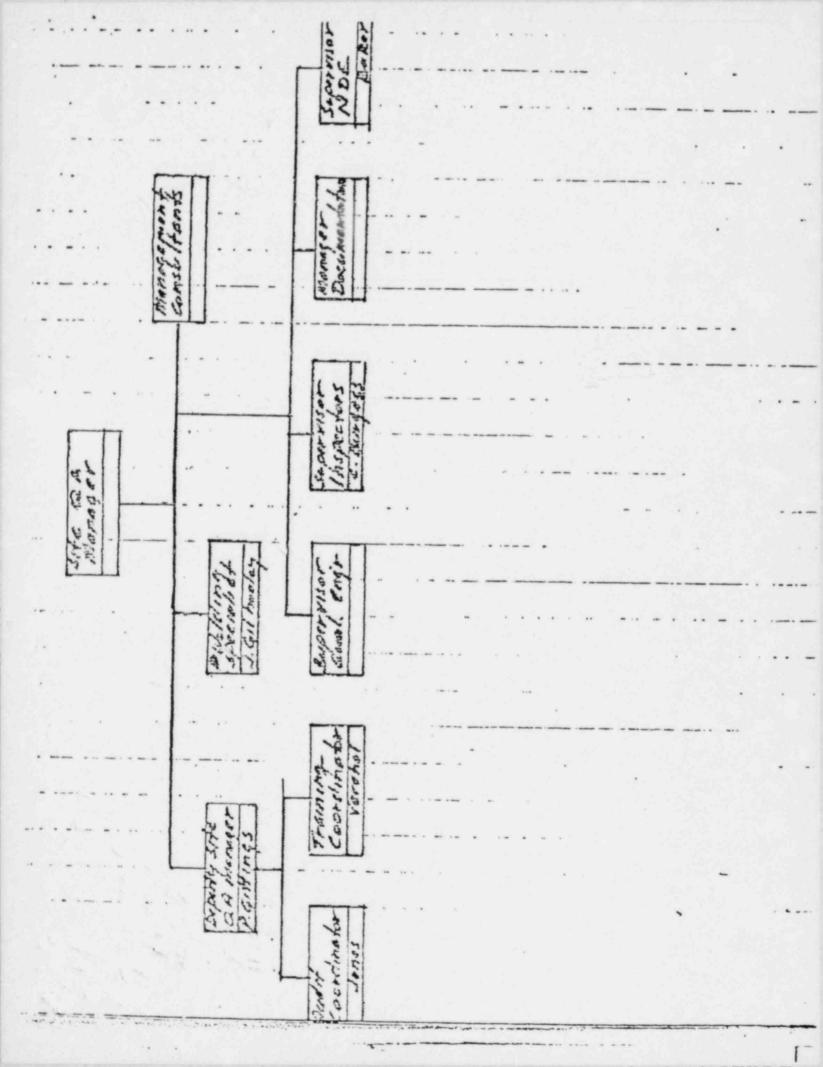
The site QA/QC organization is being restructured in accordance with the attached chart to strongthen the condecent and subervision of QA/QC activities. A Manager of documentation position has been added to manage all quality related documents. He will be supported by 3 Document Engineers in the dicipline areas, each of these engineers will be supported by a staff of engineers, technicians and clerks as required to review adequacy and accuracy of past documents and assemble required documents to confirm that the actual installation of equipment and materials conforms in the engineers drawings and specifications and NHC requirements. The Document Engineers will also be requonsible for review and adequacy of documents covering ongoing construction activities prior to entry into the central document center.

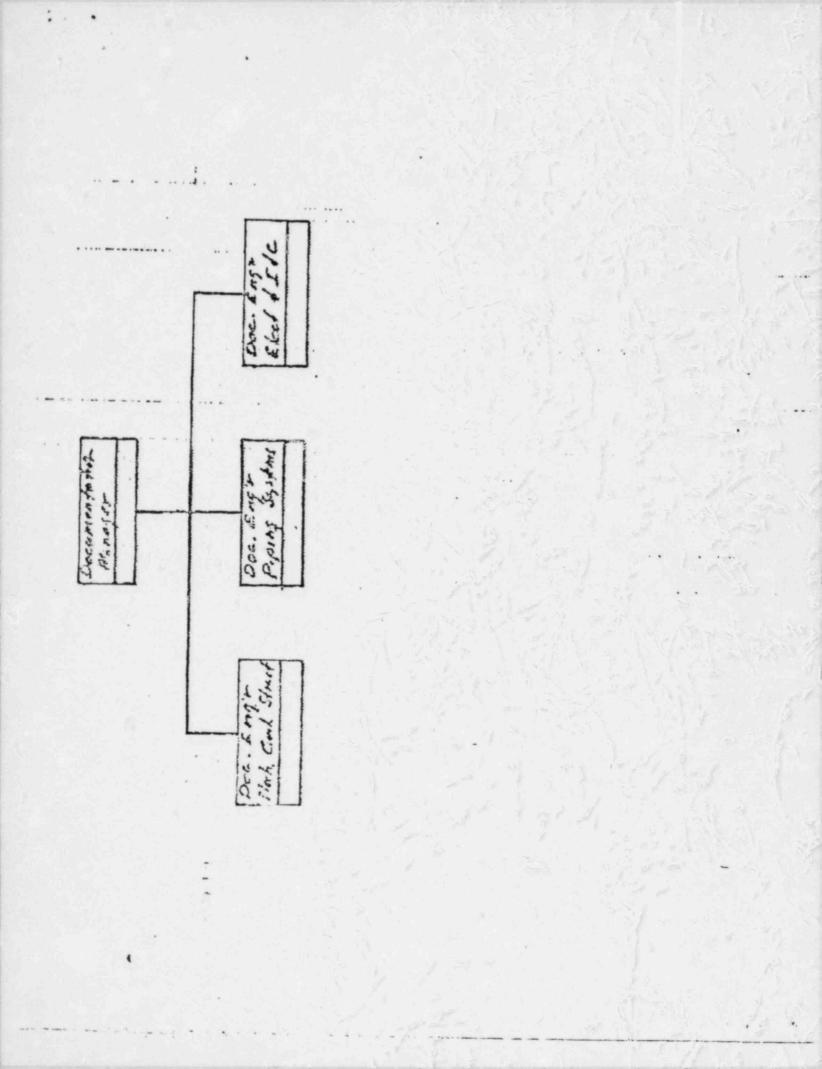
The QA/ QC Site Manager will be supported by an outside canagement consultant specialized in DA/DEC

QA/OC procedures are presently being reviewed to ensure that QA/QC requirements are clearly indicated. All (FCP) Field Construction Procedures presently included in (QACMI) Quality Assurance-Construction Rethods Instruction are being removed and specific QA/QC requirements are being substituted for these FCPs.



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A-40-The following personnel will be attending the discussions held on 4/30/81 at 8:30 a.m. in the Glas Elly office. The purpose of the discussion is to establish possible vesolations to the vadingraphy technique problems (shimming it the pourtremeter) related to The Zimmer preterie prefabricated piping. (6915 Denny Waymore, Manager of Engineering Dill Schwerrs, Manager of QA - Hungard Deve Fredrick, Medianical Engineer Nutech -- CCEE Consultants Boger Ready - Chairman ASME Dave Titcairn Al Bair Monager of QA (Level II RT) Tom Deniels, Level III RT Ed Gerwynn, ASME committee Member Transie La 2003

Hartford Sterra Biler Don Young - Supervisor of Zimmer ANI A date or Grace Feigles NES (Nuclear Engineer Services) Lou Ludwig, LIT RT - States Bab Burns 541 Jon Rudias LET RT. Murty Schuster, QC for Zimmer National Board Dick Jreger Same State of Ohio and tellar Dry Milan Pegion IT-----Horald Roomits de une

7/28/81

Barrett, Streeter, Warnick, Davis

POSITION ON "UNAPPROVED VENDORS"

Attached are relevant sections of investigation reports dealing with concerns expressed by Mr. Victor Griffin in 1976. One of his concerns dealt with materials purchased from "unapproved vendors". Investigation indicated that some materials (not components) had been purchased to Class II requirements, although documentation sufficient to meet Class I requirements was also provided. In some instances, these Class II materials were upgraded to Class I and utilized in the plant. The findings of reports 76-02 and 77-03 indicate that we considered this an acceptable practice, and the media (and public) were advised of Gur position.

It appears that the item of noncompliance issued in Section 7.1 of report 80-13 may represent a different conclusion on a similar situation, unless a beam is considered as a "component" rather than a material.

I believe that Mr. Griffin, and others, may question this apparent difference, and we should have an answer developed.

James E. Foster

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REPORT DETAILS

Section I

Prepared by E. W. K. Lee Engineering Inspector

> T. E. Vandel Assigned Project Inspector

Persons Contacted

The following persons, in addition to the individuals listed under the Management Interview section of this report, were contacted during the course of the inspection.

Kaiser Engineers Incorporated (KEI)

- D. Williams, Vice President Power
- C. Gray, Project Manager
- C. Yohe, Inspection Supervisor
- C. Makowsky, Supervisor-Site Document Center
- H. Millard, Chief Material Coordinator

Results of Inspection

RPT 30-358/16-02

Class II Materials Installed In Class I Area

The inspector reviewed the following documents relative to materials purchased as Class II (non-essential) and installed in Class I (essential) area and determined that they have proper documents and met the applicable standards. The inspector also established that the use of those materials was authorized by the KEI QA Manager:

- a. KEI stores Issue No. 08477, dated November 6, 1975, for five (5) pieces of 8' x 17' x 40' W. Flange to be installed in the Reactor Building for hanging cable pans. The heat number of the material is H09075 and Material Certification from U. S. Steel Corporation indicated ASTM A-36 specification was met.
- b. KEI stores Issue No. 08532, dated November 11, 1975, for one (1) piece of 1" x o" x 20' flat bar to be installed in the auxiliary building for hanging cable pans. The heat number of the material is 40239 and material certification from Northwestern Steel and Wire Company indicated ASTM-A-36 specification was met.



c. KEI stores Issue No. 08691, dated November 20, 1975, for 2 pieces of 7/8" x 20' round bar to be installed in the Reactor Building as anchor bolts. The heat numbers of the material is BP326 and material certification from Burlington Steel Company indicated ASTM-A36 specification was met.

Quality Assurance Program Review

The quality assurance program in effect for the Zimmer facility was reviewed by the inspector and discussed with CG&E and KEI personnel for the following areas.

a. CG&E Quality Assurance Program

Section 7 of the CG&E QA manual was reviewed regarding: (1) Selection of Source (Paragraph 7.3) and Source Evaluation (Paragraph 7.2) for Non-GE procured items, (2) Source Inspection (Paragraph 7.5) for Non-GE procured items, and (3) Receiving Inspection (Paragraph 7.6) for Non-KEI Procured Items.

It was determined that adequate measures are established in the manual to comply with the 10 CFR Part 50, Appendix B, Criterion VII requirements for (1) source evaluation and selection, (2) inspection at the vendor source, and (3) examination of products upon delivery.

b. KEI Quality Assurance Program

The KEI quality assurance manual contains adequate measures for material control in Quality Assurance Procedure (QAP) number 7 and 9 to assure that only properly qualified and accepted material are allowed to be used or installed as required by 10 CFR Part 50, Appendix B, Criterion XV. The KEI Site Quality Assurance Manager stated that additional provisions are included in QAP No. 1 regarding specific assignments of responsibilities for the site Quality Assurance Manager. He said that Paragraph 4 of the Procedure states that the site Quality Assurance Manager has the responsibility and authority to accept or reject any or all work, material, components, parts, etc. He added that under this authority he has reviewed material that has been upgraded in quality status and accepted that upgraded status when it was considered to be acceptable.

3. Components Review

Selected Safety related components were reviewed for quality documentation and establishment of quality acceptability. Following is the results of the review:

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The following is a partial list of unapproved vendors from whom we have received Class I material or Class II subsequently upgraded to Class I.

Manufacturer	Address	Product
- Connors Steel Corp.	Birmingham, Ala.	Plate, Bar, Shapes
U.S. Steel Corp.	Homestead, Pa.	Plate, Bar, Shapes
North Western Steel & Wire	Sterling, Ill.	Plate, Bar, Shapes
U.S. Steel	Gary, Ind.	Plate, Bar, Shapes
- Calumet Steel	Chicago Hts, Ill.	Plate, Bar, Shapes
U.S. Steel (Youngstown Works)	McDonald, Ohio	Plate, Bar, Shapes
- Tennessee Forging	Newport, Ark. & Earriman, Tenn.	Plate, Bar, Shapes
~ Atlantic Steel Co.	Atlanta, Ga.	Plate, Bar, Shapes
- Acimet Mfg. Co.		Nuts
Yamato Steel Works, Ltd. (Japan)		Plate
Youngstown Sheet & Tube	신간 문제가 같은	Plate
Werkszeugnis (Germany)		Plate
Weirton Steel Division		Angle
U.S. Steel	Fairless Works	Plate
U.S. Steel	Clairton Works	Angle
U.S. Steel	South Works	Beams

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Tennessee Forge - Harriman, Tennessee

Calumet Steel - Chicago Heights, Ill.

U. S. Steel - Homestead, Penn.

All these suppliers have furnished Class II steel which has been subsequently up-graded to Class I on your signature.

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MEMO, U.C. GRIFFIN TO W.J. FRIEDRICH

DATE. SEPT 22, 1975.

The comment reflects an in-house disagreement on the interpretation of a specification, rather than any noncompliance with NRC regulations, and no further investigation into the comment is required.

19. Comment Received By NRC

During the interview with NRC investigators, Individual "I" indicated that welder's qualification tests, performed at a welding school, were accepted in lieu of a qualification test being performed at the plant site.

Finding

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This comment indicates possible noncompliance with NRC regulations and requires inspection in the area of welder's qualification testing.

20.] Interview with Individual "C"

Material referred from the GAO to the NRC for investigation indicated that Individual "C" had been interviewed by representatives of the GAO, although no comments were referenced to him. As Individual "C" had made allegations which were the subject of a prior NRC investigation, Individual "C" was interviewed to insure that he had no information which had not been previously disclosed and investigated.

Individual "C", interviewed by the NRC investigators on February 25, 1977, indicated that he had no information which had not been disclosed to the NRC in the previous investigation, but that he was not satisfied with the results of that investigation (which found no noncompliance with NRC regulations on the part of Cincinnati Gas and Electric Company).

Individual "C" stated that although he had no prior nuclear experience, he had more than twenty years QA experience, and had many years experience in doing source inspections and QA audits for the aerospace industry. He said that he was employed by Kaiser Engineering in October, 1972 as a QA inspector, and his early duties were the inspection and audit of vender's QA programs. In late 1973, he indicated, Kaiser gradually stopped approving trips to do source QA inspections, and finally stopped the practice altogether.

Individual "C" said that all General Electric components which were received at the Zimmer site were accompanied by documents which proved source inspection. Since CG&E source inspections were no longer being done, venders of some of the materials (materials are unfabricated. articles such as steel plate, as opposed to components, which are in fabricated form) had not been source inspected. Individual "C" indicated that he regarded those venders who had not been subject to a source inspection as being "unapproved venders."

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Frequently, Individual "C" stated, materials would be purchased as Class II materials and later upgraded to Class I materials when it was necessary to use them in Class I installations. Individual "C" indithat he considered this upgrading of materials as improper and that he would not personally sign the paperwork that upgraded such material. A partial listing of venders who had supplied such Class II materials which were subsequently upgraded to Class I materials had and should still be in their files at the plant site. Individual "L" stated.

Individual "C" indicated that he was aware that NRC had previously investigated his concerns and found no noncompliance with NRC regulations. He said that CG&E had made no secret of the way they were operating, and had made it clear that they intended to continue with their present procedures.

The investigators advised Individual "C" that he had not presented them with any information not investigated in the previous investigation (IE Inspection Report No. 050-358/76-02) which found that CG&E was not in noncompliance with any NRC regulations, and that his concerns reflected a philosophy of quality assurance which was not reflected in NRC regulations. Individual "C" indicated that this was understood, but that he felt that the NRC regulations should be changed.

21. Discussion with Individual "L"

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Individual "L", who had been referred to by Individual "C" was contacted by telephone, and he indicated that the investigators should contact his supervisor, Individual "M".

.) Discussion with Individual "M"

Individual "M" was questioned concerning the purchasing of materials for plant construction and the procedures for upgrading materials from Class II to Class I. Individual "M" stated that plant construction materials were often purchased without knowledge of their ultimate use in the plant. As an example, he stated that a piece of steel plate could be used in a Class II or Class I location, and the same piece of plate would meet the specifications for either location. As a result, he said, materials are usually bought from a distributer as Class II materials, but documentation of the specifications of the materials is requested at the same time (these would come from the manufacturer). Individual "M" stated that if the material was then required for use in a Class I location, the documentation received with the material was used as justification for upgrading the material to Class I material. He also indicated that if the documentation received with the materials proved insufficient to justify upgrading the material, a "user's test" could be performed by an independent testing company, and the test results could be used to justify upgrading the material tested.

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Individual "M" stated that he was not familiar with the "list of unapproved venders" referred to by Individual "C" but that he would have the files checked for any such list. The list was subsequently provided to the NRC investigators. The list was reviewed and found to contain no information which alters the conclusions of the prior NRC investigation into CG&E purchasing practices. No noncompliance with NRC regulations was indicated, and no further investigation into this area is necessary.

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UNITED STATES NUCLEAR REGULATORY COMMISSION REGION III 799 ROOSEVELT ROAD GLEN ELLYN, ILLINOIS 60137

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Docket No. 50-353

 Cincinnati Gas and Electric Company
ATTN: Mr. Earl A. Borgmann Vice President, Engineering Services and Electric Production
139 East 4th Street Cincinnati, OH 45201

Gentlemen:

This refers to the investigation conducted by Messrs. G. A. Phillip, K. D. Ward and T. E. Vandel of this office on April 7-9 and 30, May 1-2 and 20, 1980, of activities at the Wm. H. Zimmer Nuclear Power Station authorized by Construction Permit No. CPPR-88 and to the discussion of our findings with Mr. B. K. Culver and others at the conclusion of the onsite portion of the investigation on May 2, 1980.

This investigation related to allegations concerning installed safetyrelated piping. The enclosed copy of our investigation report identifies areas examined during the investigation. Within these areas, the investigation consisted of an examination of pertinent records and procedures, independent evaluations and interviews with personnel.

During this investigation, certain of your activities appeared to be in noncompliance with NRC requirements, as described in the attached Appendix A.

This notice is sent to you pursuant to the provisions of Section 2.201 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Section 2.201 requires you to submit to this office within thirty days of your receipt of this notice a written statement of explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter, the enclosures, and your response to this letter will be placed in the NRC's Public Document Room, except as follows. If the enclosures contain information that you or your contractors believe to be proprietary, you must apply in writing to this office, within five days of your receipt of this letter, to withhold such information from public disclosure. The application must include a full statement of the reasons for which the information is considered proprietary, and should be prepared so that proprietary information identified in the application is contained in an enclosure to the application.

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Cincinnati Gas and Electric Company

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We will gladly discuss any question you have concerning this . investigation.

Sincerely,

James G. Keppler Director

Inclosures : Appendix A, Motice 1. of Violation 2. IE Inspection Report No. 50-358/80-09 ec v/encls: Mr. J. R. Schott, Flant Superintendent Central Files Reprovuction Unit MEC 206 PDR Local PDR ISIC TIS Marold W. Lohn, Power Siting Commission Citizens Against a Redioactive Invironment Helen W. Evans, State of Ohio

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	SURNAME	Phillip/cw Ward 7 M	Vandel Barrett	Knop D	Fiorelli	Norelius	Kennler
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Appendix A

NOTICE OF VIOLATION

Cincinnati Gas and Electric Company

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Docket No. 30-358

Based on the results of the NRC Investigation conducted on April 7-9 and 30, May 1-2 and 20, 1980, it appears that certain of your activities were not conducted in full compliance with NRC requirements as noted below. This item is an infraction.

10 CFR Part 50, Appendix B Criterion XV, states in part that "Measures shall be established to control materials, parts, or components which do not conform to requirements in order to prevent their inadvertent use or installation."

a. The Henry J. Kaiser Co. Zimmer Quality Assurance Manual in Quality Assurance Procedure (QAP) No. 16 requires in part that "All monconforming items will be segregated, where possible, from acceptable items, clearly identified with the applicable Hold or Deficiency Tag and documented on the Nonconformance Report." It additionally requires that "Upon Verification that all work on the item is complete and acceptable, the nonconformance report (NR) is signed off in Section 13 by the Inspector."

Contrary to the above, 5 piping spools identified by NRE-1911 Rev. 2 were released from segregation even though the Inspector had signed off section 13 with a notation of specific exceptions to acceptability of the material by identifying another NR controlling the material. This release was achieved through unauthorized removal of the noted exceptions on the NR.

b. The Henry J. Kaiser Co. Zimmer Quality Assurance Manual in Quality Assurance Procedure (QAP) No. 16 requires in part that "... material is clearly identified as nonconforming and is segregated, when possible. Due to size limitations physical segregation may be impractical. In such instances tagging, marking, or other means of identification is acceptable." Additionally QAP 15 requires that "A 'Hold' tag is placed on the item ... It is used in conjunction with a 'Nonconformance Report'."

Contrary to the above, 3 piping spools identified in NR E-2020 as nonconforming and required to be cleared by additional tests, not only had been released from the warehouse, but in addition had been installed without any "hold" tag being placed on the material.

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U.S. NUCLEAR REGULATORY COMMISSION OFFICE OF INSPECTION AND ENFORCEMENT

REGION III

Report No. 50-358/80-09 Docket No. 50-358 Licensee: Cincinnati Gas and Electric Company 139 East 4th Street Cincinnati, OH 45201 Facility: Wm. H. Zimmer Nuclear Power Station

Investigation At: Moscow, OH Chicago, IL

Dates of Investigation: April 7-9 and 30, May 1-2 and 20, 1980

Investigators

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Reviewed By:

Assistant to the Director

- 7/3/80 Date

C. Knop, Chief Construction Projects Section 1

Investigation Summary: Investigation on April 7-9 and 30, May 1-2 and 20, 1980 (Report No. 50-358/80-09)

Areas Investigated: Because of allegations made primarily relating to the adequacy of piping welds, performed a review of records and procedures,

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made independent evaluations and conducted interviews of personnel. The investigation involved 94 investigation hours by three investigators. <u>Results</u>: Of four allegations, one, which related to the installation of pre-fabricated piping having defective welds, was partially substantiated in that the pipes were installed before questions regarding their acceptability were resolved. One item of noncompliance, an infraction, was identified: (1) 10 CFR 50. Appendix B. Criterion XV, release of material from segregation and failure to use hold tags.

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REASON FOR INVESTIGATION

On February 28, 1980, an individual who contacted the NRC by telephone made allegations regarding the Wm. H. Zimmer Nuclear Power Station. One of these allegations was that piping having defective welds had been installed in a safety-related system.

SUMMARY OF FACTS

Following the receipt of allegations by telephone on February 28, 1980, arrangements were made to interview the alleger to obtain more detailed information. During an interview on March 3, 1980, the individual made several allegations, three of which involved matters under the jurisdiction of the NRC. By letter dated March 11, 1980, the alleger was advised that an investigation would be conducted regarding those allegations which were as follows:

- Defective welds in safety-related systems have been accepted, among them were welds CY606, HR42 and K811.
- Five defective welds were identified in prefabriacted piping but the pipes were accepted and installed in a safety-related system.
- The manner in which safety-related installed piping was flushed was inadequate and a scheduled six-week flush was reduced to two weeks.

Allegation No. 1 was not substantiated.

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Allegation No. 2 was partially substantiated in that three of five identified pipes had been installed in the main steam relief system before questions as to their acceptability had been resolved. Two items of noncompliance were identified in this regard. It was also determined that at the time of the investigation a nonconforming report requiring disposition remained open concerning the acceptability of the three pipes. During the investigation additional examinations were made of the pipes and they were determined to be acceptable.

Regarding Allegation No. 3, it was determined through contact with the primary source of the information upon which the allegation was based, that he had left the site in November 1978 and problems in this area had been identified and resolved through NRC inspections conducted between November 1978 and the receipt of the allegations in March 1980.

Following completion of the investigation at the Zimmer site, the alleger contacted Region III and alleged he had evidence of a criminal

- 3 -

conspiracy and that the welds on the three above-mentioned pipes had been cut out and repaired during the course of the investigation and this information was withheld from the NRC. The basis for these allegations, which consisted of recordings of three telephone conversations, was obtained from the alleger during an interview on May 8, 1980. No information or evidence was obtained to confirm these allegations during the interview or during subsequent investigation.

 One item of noncompliance, an infraction, was identified during this investigation.

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DETAILS

1. Persons Contacted

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Cin	cinnati Gas and Electric Company (CG&E)	
*B.	K. Culver, Project Manager	
*W.	W. Schwiers, QA Manager	
*R.	L. Wood, QA Engineer	
*D.	C. Kramer, QA and S Engineer	
s.	Swain, Construction Manager	
*J.	F. Weissenberg, QA and S Engineer	
*R.	Marshall, Project Superintendent	
	V. Knox, QA Manager	1
	R. Baumgarten. QA Manager	
	M. Dorr, Construction Engineer	
Α.	Pallon, Welding/NDE QA Engineer	
F.	Oltz, Analysis and Procedures Supervisor, QA	
	Deerwester, Supplier QA	
D.	Haag, OA Inspector	

Peabody Testing Services (Peabody)

Ernest Aldredge, President Charles Wood, Manager, Cincinnati Office (via telephone) Wayne Draffon, Supervisor (via telephone) Alan Sellars, Field Supervisor D. Burdsal, Level II Inspector

Nuclear Energy Services, Inc. (NES)

R. Bott, NDE Supervisor R. A. Zieber, NDE Inspector

2. Introduction

On February 28, 1980, the Office of Inspection and Enforcement NRC Headquarters advised Region III of a telephone conversation with an individual who made allegations concerning activities at the Wm. H. Zimmer Nuclear Power Plant Construction site, and requested that the individual be contacted. Later the same day during a telephone conversation with Region III, and during an interview on March 3, 1980, the individual made several allegations. The individual stated that he had been employed by a private detective agency, and the licensee, CG&E, through his employer, had engaged him to work under cover at the Zimmer site to investigate time card padding by site personnel. His investigation effort began on December 10, 1979 and ended on January 4, 1980. In addition to information regarding worker time card padding, he obtained information regarding other activities which was the basis for several allegations, some of which related to matters under the jurisdiction of the NRC.

The individual stated he had earlier prought his information to the FBI. He indicated he was uncertain as to what action, if any, would be taken by that agency.

The individual stated he had documentation relating to his allegations in the form of weekly reports he had prepared and tapes of several of his conversations with site personnel. During the interview on March 3, 1980, the individual played those parts of the tapes which he said contained pertinent information and made available copies of his reports.

3. Allegations

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Based on the information obtained through the interview with the alleger, a review of the taped conversations and his investigative reports, three allegations involving activities under NRC jurisdiction were developed. By letter dated March 11, 1980, the alleger was advised that an investigation of these allegations would be conducted. A copy of this letter with the alleger's identification deleted is attached to this report as <u>Exhibit A.</u> These allegations and information regarding them obtained during the investigation are set forth below.

Allegation 1: Defective welds in safety-related systems have been accepted, among them were welds CY606, HR42 and K811.

The identification of the specific welds in this allegation was obtained from a review of the tape the alleger had made surreptitiously of his conversations with site personnel. According to the information obtained by the alleger, weld CY606 was buried in concrete between the Radwaste Building and the Containment Building. He said it was his understanding that they dug it up to repair it, but he was uncertain whether this was done.

Regarding weld HR42, the alleger said that he had informed CG&E that this weld was defective. He said he had heard that another testing firm had been hired as a consultant, and this firm had confirmed the weld was defective. He also said it was his understanding that this defect was reported to the NRC.

Regarding weld K811, the alleger said he was informed that this weld had "an insert fault" and that KEI had ordered that it be accepted. The alleger stated that Peabody Testing Services (Peabody), also referred to as Magnaflux, personnel had informed him that some welds that Peabody, the nondestructive testing contractor, had rejected as faulty were subsequently accepted by KEI, the site construction management contractor. He said that a Peabody employee had records identifying the welds rejected by Peabody which were subsequently accepted by KEI. He indicated that by way of explanation, CG&E had informed him that the interpretation of the film obtained through radiographic examinations of welds is a judgment call. The appearance of an item on a radiographic film may be judged to be a defect by one individual and not by another and KEI could overrule Peabody.

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Finding:

On April 7, 1980, the Peabody field supervisor was interviewed. He stated that he had no records showing the welds Peabody had initially rejected which were subsequently declared acceptable by KEI. He indicated that, although he was aware that this had occurred, he did not know how often and he could not provide any specific instances. He also stated that the results of radiographic examinations are recorded on reader sheets. The radiographic film and the original reader sheets are turned over to KEI. He said Peabody only had carbon copies of the reader sheets.

As a means of further evaluating whether KEI was accepting welds identified as defective by Peabody, a safety-related system, the High Pressure Core Spray System, was selected and all reader sheets pertaining to it were reviewed. Of 99 welds in the system which were radiographed, two instances were noted in which Peabody had checked the reject column and KEI had lined that check out and had checked the accept column. The radiographs of these two welds were reviewed by an NRC inspector who is a certified NDE Level III. He concurred that the welds were acceptable. Conversely, it was noted that in several instances, between five and ten, the original accept check mark entered by Peabody had been lined through and a reject check had been entered by KEI.

Regarding the subject of welds and radiographs of them, an NRC inspection conducted on November 8-9, and December 12-13, 1978 (Report No. 50-358/78-30) identified several discrepancies in radiographic techniques and reports. During a subsequent inspection on September 18-20, and December 11-12, 1979 (Report No. 50-358/79-17) several more discrepancies were identified. CG&E then hired NES to rereview radiographs and reports of all welds which had been accepted for turnover prior to operation. This review began in October 1979 and was completed in early April 1980. The review included 2,390 radiographed welds. Of those, 958 had report discrepancies, 543 had some technique problems and 14 welds were found to be unacceptable because of defects.

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The KEI Project Superintendent advised on May 1, 1980, the 14 welds were being re-examined and resolution regarding them had not been completed. He stated that one of the 14 welds found to be unacceptable was the subject of a nonconformance report and, therefore, had not been accepted for turnover. This weld, he said, should not have been included in the NES review. Another weld had been cut out of the pipe for examination and it was determined that, although it appeared to have a defect on the radiographic film, ft was, in fact, an acceptable weld.

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Regarding weld No. K811, a review of records showed it was welded on November 9, 1977, but because an Authorized Nuclear Inspector hold point was missed at the fitup, the weld was cut out and replaced by weld No. K916. The missed hold point was documented by Nonconformance Report (NR) No. E-2138R1. This NR indicates that the disposition was to cut out and replace the weld. It was determined that weld No. K916 had not yet received final acceptance.

Regarding weld No. RH42, records indicated this weld was first radiographed on August 9, 1976, and found to have unacceptable porosity and slag in the areas of 36-48. The areas were repaired and a reradiograph performed on August 10, 1976 found it to be acceptable. A review was made of the radiographs for weld quality, techniques, and report accuracy by an NES Level II radiographer on January 25, 1980 as part of the above-mentioned re-review initiated after the 1978-79 NRC inspections. The NES Level II radiographer found some discrepancies which have not been resolved, and the weld has not been given final acceptance.

Regarding weld No. CY606, a review of records showed this weld was first radiographed on July 15, 1976 and found to have incomplete fusion and penetration in the areas of 0-13 and 13-16. The areas were repaired and the weld re-radiographed on June 8, 1977 and found to be acceptable. A review was made of the radiographs for weld quality, techniques and report accuracy by an NES Level III radiographer on October 12, 1979 as a result of the NRC inspection conducted in 1978. The Level III found some discrepancies which have not been resolved and the weld has not received final acceptance.

Allegation 2: The manner in which safety-related installed piping was flushed was inadequate and a scheduled six-week flush was reduced to two weeks.

The alleger provided information that a site employee informed him on December 27, 1979, that another individual who had been employed as a general foreman at the site had objected to the flushing procedures used. He had also objected when a particular flush that should have taken six weeks was cut to two weeks. On one occasion the individual had demonstrated the flushing was inadequate by pounding on a pipe which released sediment and slag during the flush. The identity of the former general foreman was provided by the alleger. Finding: On April 7, 1980, the former general foreman was contacted and interviewed. This individual said he had worked at the Zimmer site from June 1973 until November 1978. In 1978 he was the general foreman of the flush group.

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Regarding the six-week versus two-week flush, the individual indicated it had been anticipated six weeks would be needed to prepare for and flush one of the systems. He, however, was able to accomplish a satisfactory flush in two weeks. He indicated that the shorter time did not mean the flush was not done according to the requirements. Rather, it was a case of he and his men being able to accomplish a job in less time than expected.

This individual stated that in his opinion the welding done on the critical systems, such as the main steam lines and in the reactor building, was good. He said, however, that several problems were encountered in the flushing activities while he was at the site but he was unable to provide information regarding any specific requirements that were not met.

NRC inspections conducted subsequent to the departure of this individual from the site included an examination of flushing activities and some specific problems were identified. On the basis of one of these inspections, conducted January 3-6 and 8, 1979 (Report No. 50-358/79-01), one item of noncompliance and one deviation were identified. The noncompliance related to a failure to close a valve during a flush and an inadequate procedure to assure boundary valves are closed. The deviation was that the procedure did not require tagging of boundary valves. A second inspection conducted February 27-28, March 1-2, 19-23, and April 9-11, 1979 (Report No. 50-358/79-06) resulted in one item of noncompliance regarding flushing activities. This related to a failure to maintain control of flushing waters resulting in the flooding of equipment in a system which had been turned over for preoperational testing.

The individual indicated a matter of concern to him was that a hydrotest of the reactor containment was successfully performed, but after the test some instrument lines were cut out which invalidated the hydrotest. He indicated he was uncertain as to whether CG&E would attempt to use this test as meeting test requirements or whether the NRC was aware the test had been invalidated by the subsequent modifications.

On April 8, 1980, the NRC Resident Inspector advised that he as well as CG&E were aware that the initial hydrotest was not valid because of the subsequent modification of the instrument lines. He stated that another hydrotest was tentatively scheduled to be performed during the summer of 1980.

In view of the above, further investigation at the site in the area of flushing activities was not pursued.

Allegation 3: Five defective welds were identified in prefabricated piping, but the pipe was accepted and installed in a safety-related system.

Through a review of reports written by the alleger and the tapes of conversations with site personnel as well as information supplied through interview on March 3, 1980, the following information was obtained regarding this allegation.

During the NRC hearings in November 1979, a question was raised concerning an accident which involved the dropping of fuel rods. A former site employee had provided information to attorneys who were opposed to the licensing of the plant which was the basis for raising this question. A miscommunication between the former employee and the attorneys occurred, however. The question about an accident should have referred to piping being dropped from a tractor trailer rather than fuel being dropped.

The alleger advised that in about October 1979, a trailer load of pipes fabricated at the Kellogg Company, located in Pennsylvania, arrived at the site in the middle of the night. Since personnel and proper equipment were not available to unload it properly a member of CG&E management issued instructions to push the pipe from the truck onto the ground.

When the pipes were found on the ground the following day, it was decided that the pipes would have to be inspected by x-ray to determine whether they had been damaged. Peabody was instructed to x-ray (radiograph) the pipes and 5 to 8 faulty welds were identified. Since Peabody had been instructed to check the pipes but not the welds, and since the welds had been tested and found to be acceptable before shipment by Kellogg, the pipes were approved by KEI Quality Assurance. These pipes were installed in the Main Steam Relief System, a safety-related system.

Finding: A bill of lading dated June 29, 1979 showed that Pullman Power Products, a division of Pullman, Inc., Williamsport, Pennsylvania, formerly known as M. W. Kellogg Company, released to the Daily Express Company five pieces of pipe assembly I/S, weighing 6,700 pounds, for delivery to the CG&E Zimmer site on Monday, July 2, 1979. A packing slip accompanying the shipment listed the following pieces:

IMSO8BB12-6B IMSO9BA12-1AH IMSO8BA12-5BH IMS11B12-7BH IMS10BA12-ICH

A KEI receiving stamp shows it was received on July 3, 1979. Copies of the bill of lading and the packing slip were obtained and are attached to the report as Exhibits B and C, respectively.

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Each of these pipes (spool pieces) were for the Main Steam Safety Relief Valve discharge and were carbon steel pipe assemblies approximately 15' 7 5/8" long, 12 3/4" in diameter and having a wall thickness of .687".

On hand at the Zimmer site were QA documentation packages for each of these 5 spool pieces received from Pullman. A copy of one package was obtained and is attached to this report as Exhibit D. 2

On July 5, 1979, Nonconformance Report (NR) No. E-1911 was prepared indicating "Spools were rolled off of truck onto ground and striking other spools" and listing the above identification numbers. The issuance of this NR had the effect of placing these pipe spools in a hold status in the KEI warehouse. On July 10, 1979, the KEI Construction Engineer entered the following disposition on this NR "Rework. (1) Perform liquid penetrant test on all welds; (2) perform visual inspection of weld and preps. Accept on basis of inspection (1) and (2). Should any pipe spool fail due to inspections (1) and (2) a separate Nonconformance will be issued." A KEI QA engineer concurred in this disposition on the same date. A copy of NR E-1911 is attached to this report as Exhibit E.

NR E-1911 was voided and superseded by NR E-1911 Rev. 1 on the same date, July 10, 1979. KEI and CG&E personnel advised that the disposition shown on NR E-1911 was reconsidered because they wished to avoid removing the paint from the welds which would be necessary before a liquid penetrant examination could be performed. NR E-1911 Rev. 1 changed the first item of the disposition to: "Perform RT examination of all welds." A copy of NR E-1911 Rev. 1 is attached to this report as Exhibit F.

A OA Surveillance Report dated July 23, 1979, addressed to a CG&E QA engineer signed by the KEI NDE QA engineer, showed that on three spool pieces, weld X4 had rejectable indications, and requested to be advised concerning the dispositioning of these rejections. The CG&E QA engineer stated that to the best of his recollection, he did nothing in response to this request and could not recall having discussed the matter with anyone. A copy of this Surveillance Report is attached to this report as Exhibit G.

CG&E and KEI personnel stated all five spool pieces were radiographed on an "information only" basis but only the films for those three Referred to in the Surveillance Report were retained. The X4 weld is a weld which joins a solid cap to one end of the spool piece. Radiography is not the appropriate technique employed to examine a weld of this kind since the gamma rays must pass through the cap (about 12' of metal) as well as the weld. The KEI Construction Engineer said the radiographs were done with the thought that they might show surface damage, even though it was recognized the quality of the film would not be good and it was recognized that the film would Add or classific wou town new to the state not meet any code standards.

- 11 -

NR E-1911 Rev. 1 was voided and superseded by NR E-1911 Rev. 2 on July 31, 1979. The disposition shown on the latter was to perform RT examinations of all "butt-welds" and to perform visual examinations of all "fillet-welds."

A QA Surveillance Report dated August 8, 1979 showed that, all five spool pieces were visually examined and were found acceptable. A copy of this Surveillance Report is attached to this report as Exhibit H.

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Since two spool pieces had shown no indication of damage through Aradiographic examination and visual examination another NR, No. E-1997, dated August 9, 1979, was prepared as a mechanism to remove those 1. two spool pieces from a hold condition but to retain an open NR on the other three. NR E-1911 Rev. 2 was closed by KEI QA on August 9, 1979, with the notation "Exceptions on ---- See NR E-1997." A copy of the NR E-1911 Rev. 2 is attached as Exhibit I.

NR E-1997 showed that the spool pieces IMS09BA12-1AH and IMS08BA12-5BH were acceptable. On August 13, 1979 the KEI Construction Engineer placed a notation on NR E-1997 "CG&E to disposition." The KEI Construction Engineer stated that this was appropriate since CG&E has responsibility for off-site vendor supplied items. On August 19, 1979 the CG&E Construction Engineer added the disposition "Accept-As-Is" and described the reasons for this disposition. A copy of NR E-1997 is attached to this report as Exhibit J.

Quality Assurance Instruction, QACMI No. G-4, Nonconforming Material Control, requires that NRs dispositioned "Accept-As-Is" be signed by the Material Review Board before they are closed out. NR E-1977 was closed out on October 17, 1979 with a comment added by the Sargent & Lundy (S&L) board member to the effect that "Welds rejected by radiograph are covered by NCR E-2020." A copy of the closed NR E-1997 is attached to this report as Exhibit K.

NR E-2020 showed the same information as NR E-1997, but at the time J Question inte of the investigation, E-2020 had not been closed out. A copy of Siper 1 preces NR E-2020 is attached to this report as Exhibit L.

(rest. malle A review of records at the warehouse showed that the three spool pieces, which were the subject of the open NR had been released to construction for installation as follows:

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Item	Issue Da
IMS11B12-7BH	9/18/79
IMS10BA12-ICH	9/24/79
IMS08BB12-6B	9/28/79

- 12 -

On April 8, 1980, it was established that these spool pieces had been installed and no "Hold" tag or "Deficiency" tag had been placed on them. This is in noncompliance 10 CFR 50, Appendix B, Criterion XV, and KEI Quality Assurance Procedure No. 15,

It was ascertained that the spool pieces had been released from the warehouse on the basis of a later version of NR E-1911 Rev. 2 on which the above-mentioned notation referencing NR E-1997 had been lined through on September 14, 1979. A copy of this version of NR E-1911 Rev. 2 is attached to this report as Exhibit M.

It was determined that the QA Document Control Supervisor had lined out the notation. He indicated that he had heard that NR E-1997 was being voided so he felt there was no point in it being crossreferenced any longer on NR E-1911 Rev. 2. The supplier QA man in the warehouse indicated to him that some pressure was being felt from construction to get the spool pieces released. The Document Control Supervisor informed the warehouse that NR E-1911 Rev. 2 had been closed out and it was all right to release the spool pieces. He said this was done on the assumption that what was considered to be a paper problem would be cleared up. The Document Control Supervisor as well as other site personnel indicated the acceptability of the spool pieces was regarded as a paper problem rather than a real problem. It was indicated that the probability of actual damage to pipes of that size and wall thickness due to mishandling upon delivery was extremely remote. NRC of the spoil of the spoil of the spoil that size and wall thickness due to were spoil of the spoil of the spoil that size and wall thickness due to mishandling upon delivery was extremely remote. NRC of the spoil of the spoil of the spoil that size and wall thickness due to were spoint.

The supplier QA man advised that the spool pieces were released from the warehouse on the basis of the version of NR E-1911 Rev. 2 which had the reference to NR E-1977 lined through (Exhibit M). He indicated that the Document Control Supervisor was instructed to line through the notation by a CG&E official. The latter individual, however, denied any recollection of having given that instruction. The improper close out of NR E-1911 Rev. 2, which resulted in the release of spool pieces for installation before their acceptability had been established is in noncompliance with 10 CFR 50, Appendix B, Criterion XV, and KEI Quality Assurance Procedure No. 16. (80- MARCH 2)

On April 23, 1980, Deficiency Tags were placed on the spool pieces and during the period April 25-28, 1980, Peabody personnel performed magnetic particle and ultrasonic inspections of the welds in question. Only The reports of these inspections were reviewed and the Peabody inspectors performing these examinations were interviewed on May 1, 1980. The Peabody personnel stated that they had concluded on the basis of these examinations that the spool pieces were acceptable. It was also ascertained that on April 28, 1980, Pullman personnel visited the Zimmer site and also performed ultrasonic inspections of the welds. On the basis of these examinations, Pullman provided lock of a statement to CG&E that these welds were acceptable. Peabody personnel advised that they had observed the examinations performed by Pullman and they agreed with the results.

7 Clarity statement in new report, That only I usual inspection was necessary in UT +MT kill not have to be performed on the 2 originally accepted preces

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4. Additional Allegations

During telephone contacts with the NRC on May 5 and 7, 1980, the alleger stated that he had evidence of criminal actions relating to the spool pieces which were the subject of Allegation No. 3 above. He stated that he had evidence that between the two visits to the Zimmer site by the NRC investigations team on April 7-9 and April 30-May 1-2, the welds had been cut out and/or repaired. This he alleged, was the reason that the welds were judged to be acceptable during the second visit. He also stated he had evidence that pressure was exerted upon Peabody personnel to withhold information from the NRC in connection with the investigation.

On May 8, 1980, the alleger was interviewed jointly by NRC and FBI personnel. During this interview the alleger provided for review a tape recording of three telephone conversations he had had with Peabody personnel. After listening to the three conversations, the FBI representative indicated that they did not appear to him to be evidence of criminality. The tape was furnished to the NRC for further review and follow up.

The first conversation, according to the alleger, took place on May 5, 1980 with a supervisor in the Peabody, Cincinnati office. At one point during this conversation the supervisor said: "They cut some of those welds out." The alleger responded: "You mean since the NPC had begun their investigation?" The supervisor then said: "Oh, yes, they did that the next Monday." Later in the conversation, the supervisor said: "I do know they started repairing some welds."

On May 20, 1980, the supervisor who had made the above statements, was interviewed by telephone. He stated that he had no first-hand knowledge of activities at the Zimmer site and that his comments to the alleger were based upon his conversations with Guether Peabody employee. This second individual visits the Zimmer site and may have acquired the information himself, or through conversations with another Peabody individual who does work at the site. He stated he did not know whether the information he received concerning the repairs of welds related to the three spool pieces or to some other pipes.

The second Peabody employee was also interviewed by telephone on May 20, 1980. He advised that the welds that were repaired were some which had been identified as bad during the NES audit. He said to his knowledge no repairs had been made on any 12" pipe welds. He added that he had reviewed the results of the ultrasonic examinations performed on the 12" pipes and he had concluded the welds are acceptable.

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Attachments: Exhibits A through M

List of Exhibits

- A Ltr dtd 3/11/80 NRC to Alleger
- B Bill of Lading
- C Packing List
- .14: D - QA Documentation Package
- E NR E-1911
 - * F NR E-1911 Rev. 1
 - G Surveillance Report dtd 7/23/79
 - H Surveillance Report dtd 8/8/79
 - I NR E-1911 Rev. 2
 - J NR E-1997
 - K NR E-1997 (closed)
 - L NR E-2020
 - M NR E-1911 Rev. 2 (closed)

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Dear

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This refers to the meeting between you, Mr. L. Williams - of the NRC Baadquarters Office, and me on March 3, 1980.

On the basis of the information you provided we plan to conduct an investigation at the Wa. E. Zimmer Nuclear Fower Flant regarding the following alleged matters:

- 1. Defective welds in safety-related systems have been accepted, among them were welds CY 606, MR 42 and K 811.
- 2. Five defactive welds were identified is pre-fabricated piping but the pipe was accepted and installed in a safety-related system.
- 3. The manner in which safety-related installed piping was flushed was inadequate and a scheduled 6-wack flush was reduced to 2 weeks.

You will be informed of our findings following completion of our investigation.

Sincerely,

G. A. Phillip Investigation Specialist

> Exhibit A Page 1 of 1

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Exhibit C - Page 1 of 1

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PIPING QA DOCUMEI ION CHECKLIST

Subassembly Packages

System M3		C.G. SE. System No. N/A
Document Identification	Pipe or Fitting Mark No.	Weld No.
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LP Examination Record	N	<u> </u>
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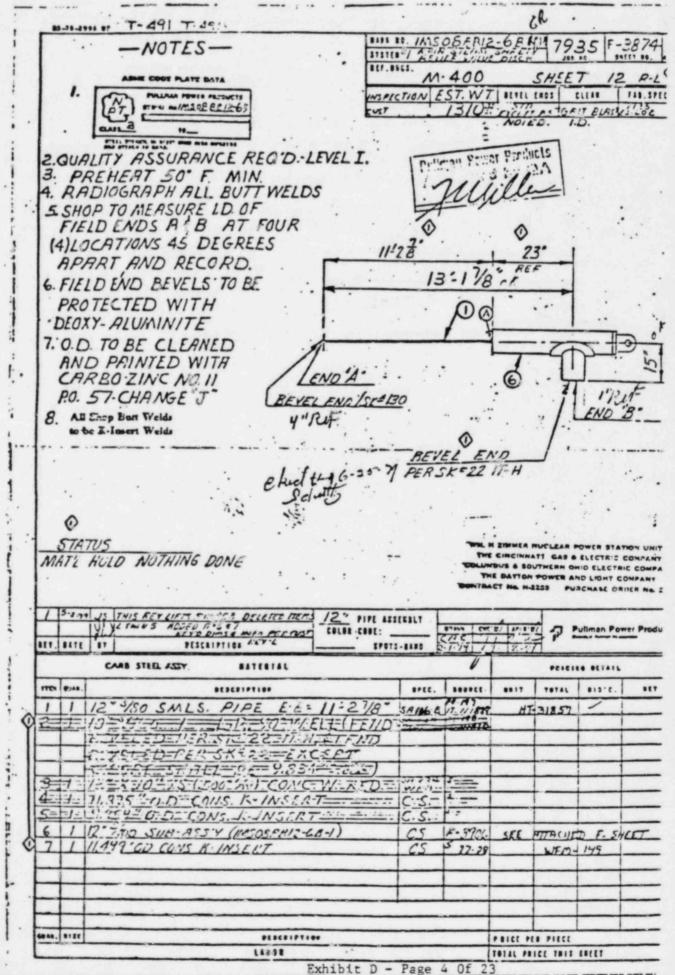
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PullITTE & Kellogg ... - QUALITY ASSURANCE DEPARTMENT, AND FOUND TO BE ACCEPTABLE IN ACCORDINCE WITH THE GOVERNING SPECIFICATIONS.

Revision 1: Deleted Code 22, 25, and 26 O.C. MWAGER Added Code 192 Added Suffix "Z" DATE

179 DATE _

Exhibit D-Page 7 of 23

PAGE __ OF_

15.10.217 Exhibit D - Page 8 of 23 Pullman Potter ioducis VILLIANSPE FOR F- 3906 ... WELD HISTO T LECORD 7935/7936 JOB NO. N -MIN. TALL ASSEMBLY MARK NO. 4106-3 Costo PREPARED BY CUSTOMER APPROVED - KELLOGG WELD PROCEDURES/CODE (Code 42) PI-K1-F4-SMAW-29-2G (Note A) (Code 192) P1-08-F6-SAW-32-1G (Note A . (Code 52) P1-K1-F4-SMAW-29-56 (Note A) (Code 72) P1-BR-F4-SMAW-12-2G (Code 62) P1-K1-F6-SAW-29-1G (Note A) (Code BZ) P1-BR-F4-SMAW-12-5G (Code 1267) PI-OB-ATTACHMENTS-6C (Note A & B) (Code 92) P1-BR-F6-SAW-7-1G Note A: Mechanical Test includes 'Charpy V-Notch Test at- (minus) -20° F. Note B: Open Butt Procedure permitted for nozzles, fillets, and non-pressure attachme: welds only (unless otherwise noted on the spool detail sheet). 31 . CONS. INSERT 8007 FINAL FILLER METAL PASS FLO WELD MAX. PRE-PROTET. SUAL FURN. STLD AT LIER INTER: NOOM MEAT 1002 CHART IDL"IT. SIMBOL HEAT HEAT OR PASS TYPE TYPE SIZE 10 LP HO. NO. MMBER LOT NO. TELP !F 73 25 ETOSL 11: +5757 144 cf 26Z 7018 32 026678 169 BY 1217 1262 4 oc 7018 026879 161 1/4 1.7 : 2. 23 E7056 1/16 F5757 144 BY 0200-18165 3/02 7018 262 and 02+874 161 1262 1262 2018 532 020867 163 7018 67056 \$5757 1/16 026679 -018 22 1767 milk: 7018 BY 020574 1262 1262 218 5/32 C26867 OT ARAM 32 026078 165 7018 82 161 026074 7018 3 82 026017 163 82 7014 026(22 152 7018 7010 31 626678 AI 82 7018 026074 82 BC 7013 3 026567 K/M 1010. C21.C27 6 CERTIFY THAT THIS RECORD AND THE FINAL RADIOGRAPHIC REPORTS HAVE BEEN REVIEWED BY Pullimen Kellogg ... - QUALITY ASSURANCE DEPARTMENT, AND FOUND TO BE ACCEPTABLE IN ACCORDANCE WITH THE GOVERNING SPECIFICATIONS. Day lan Revision 1: Deleted Code 22, 25, and 26 O.C. MANAGER Added Code 192 6/27/10 DATE . "Added Suffix "Z" PAGE Z OF m. . . L.

15-70-227 Pullman Fo roducts Driston of P tin. 2 1 Far 1 3 74 TELD HISTC' SECORD HANGER LUG'S JOB NO. N-ASSEMBLY MARK NO. 4:032812-15. WALL c/s £ 20 BASE MATERIAL - TYPE - IDENT. PREPARED BY Milliotur CUSTOMER APPROVED - PULLMAN POWER PRODUCTS WELD PROCEDURES/CODE RED V-2 R-1 PER U.T REPORT 6-6-79 126 2 1º1-08-ATTACHAIENTS-66 6-6-79 C Bp. y.R.2 68-79 CONS. INSERT FILLER METAL PROC WELD PROC FOR \$5 WELD PROCED. WELDER FOR MAX. STEEL IDENT CODE m DOO SYMBOL PRE-INTER. ũ WE HEAT HEAT OR LOT NO. TYPE HEAT TYPE SIZE FERRITE NO NURBER PASS Å SI CONTROL TEMP "F. 23 3019 026078 162 Y TY 026674 1260 7018 016667 R.1 1262 1262 Ard O 70/2 12 026078 70/2 13 026074 70/0 20 026007 TY 2 Г 12:2 Q Tois 1262 П P-1 Quel 7018 732 02 1776 9015 6 020774 7018 532 02674 SG 1267 X R.2 õ 1252 1262 200 ... e I CERTIFY THAT THIS RECORD AND THE FINAL RADIOGRAPHIC REPORTS HAVE BEEN REVIEWED BY

PULLMAN POWER PRODUCTS - QUALITY ASSURANCE DEPARTMENT, AND FOUND TO BE ACCEPTABLE IN ACCORDANCE WITH THE GOVERNING SPECIFICATIONS.

a. Rain bon Q.A. MANACIR __ DATE PAGE DOF 3 Exhibit D - Page 9 of 23

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Pullh.un	ICORAPHIC IN			AA.	FOCAL SPOT \$120	W/C BROCESSING OTHER SURFACT	-										
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Pullman Power Products Exhibit D ' Dursion of Putman Incorporated Page 12 of 23 MAGNETIC PARTICLE INSPECTION RECORD DATE 6/26/79 JOB NO. 7935 "F" NO ._ . 38 74 PIECE NO. 1-MS-OEBB 12-68 MATERIAL C/S EXAMINATION PROCEDURE ES 40.5 REV 4 ACCEPTANCE CRITERIA ES 405 REVY EQUIPMENT MANUFACTURER MAGNAFILY EQUIPMENT MODEL NO. KRH-2B PARTICLE COLOR GRAY AMPERAGE 625 PROD. SPACING 6 RECORD OF EXAMINATION RESULTS Welde A, V,W, X, Y, Z and i "adjacent base material and attackment areas on hangers. Accept INSPECTOR Sary De SNT-TC-1A LEVEL_ RECORD OF RE-EXAMINATION NAME OF INSPECTOR_ SNT-TC IA LEVEL

Pullman Power Products ULTRASONIC FLAW DETECTION RECORD DATE 6/6/9 7936 JOB NO. - NO 3906 PIECE NO. IMSOBBBIZ-66-1 MATERLAL EXAMINATION PROCEDURE NO. 1X-37 1X-37 ACCEPTANCE CRITERI KRAUTKRAMER- USIP-11 EQUIPMENT MODEL NO. 2.25 Mhz- STRAIGHT BEAM TRANSDUCER \$ 20 oil COUPLANT PRILLED OIL - TEST PLATE. CALIBRATION DATA DESCRIPTION OF INSPECTION TECNIQUE MANUAL SEARCH - 100% COVERAGE - STRAIGHT BEAM RECORD OF EXAMINATION RESULTS R-1 WELD & Q REJECT. No fusion Alone Longth of weld. -1 INSPECTOR Ronald R Delken SNT-TC-1A LEVEL RECORD OF RE-EXAMINATION 617/19 REPAirs made by Bock Gouging . - RE- welding - RE-U.T. wads Y & Z complete. wild Z. OK -Accept INSPECTOR Ronald R. Delle WELL -Y- REJECT. SLAG, POROSITY, ETC. ENTIRE WELD SNT-TC-1A LEVEL Exhibit D - Page 13 of 23

Pullman Power Products LIQUID PENETRANT INSPECTION RECORD DATE 6/6/79 JOB NO. 7935 "F" NO. 3906 PIECE NO. 1-M5-08 BB-12-68-1 MATERIAL C/S EXAMINATION PROCEDURE ES 404 REVS ACCEPTANCE CRITERIA ES 404 REUS BATCH NO. OF : BRAND NAME AND TYPE OF: PENETRANT TURCO Dy CHESK #2 PENETRANT \$ 12972 CLEANER TURCO Dy CHECK #3 CLEANER BOSS DEVELOPER I 198 DEVELOPER TURCE Dy CHECH NAD CHEMICAL AMALYSIS CERTIFICATION OF TEST COMPONENTS AVAILABLE. RECORD OF EXAMINATION RESULTS REPAIR CAVITY ON WELDS YEZ AND ADJACENT BASE MATERIAL ACCEPT NAME OF INSPECTOR SNT-TC-1A LEVEL RECORD OF RE-EXAMINATION NAME OF INSPECTOR __ SNT-TC-1A SEVEL_

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Pullman Power Products LIQUID PENETRANT INSPECTION RECORD DATE 6/8/79 JOB NO. 7935 "F" NO. 3906 PIECE NO. 1-MS. 08 8312-68-1 -MATERIAL C/S EXAMINATION PROCEDURE ES 403 Rev. 5 ACCEPTANCE CRITERIA ES 403 Rev. 5 BATCH NO. OF : BRAND NAME AND TYPE OF: PENETRANT X12-87R PENETRANT Dy chek # 2 CLEANER BOSS CLEANER Dy chek # 3 DEVELOPER 7198 DEVELOPER DY CHEK NAD CHEMICAL ANALYSIS CERTIFICATION OF TEST COMPONENTS AVAILABLE. RECORD OF EXAMINATION RESULTS (back side) Weld Y, Acavity - Accept. NAME OF INSPECTOR Charles Smith SNT-TC-1A LEVEL. RECORD OF RE-EXAMINATION NAME OF INSPECTOR SNT-TC-IA LEVEL_

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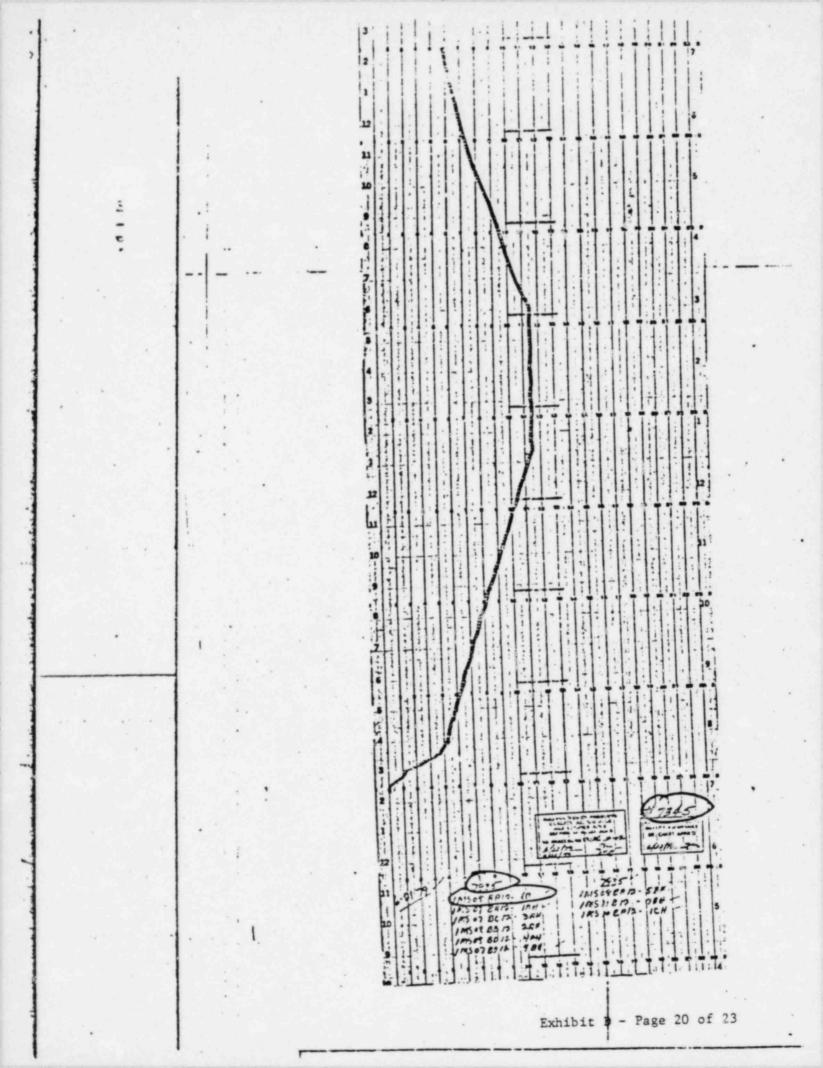
Pullman Power Products 7 ULTRASONIC FLAW DETECTION RECORD DATE 6/9/79 JOB NO. 7935 "F" NO. 3906 PIECE NO. 1MSOBBE12 - 68-1 172 MATERIAL EXAMINATION PROCEDURE NO. 1X-37 1X-37 ACCEPTANCE CRITERI KRAUTKRAMER - USIP-11 EQUIPMENT MODEL NO. 2.25 MAZ- STRAIGHT BOAM. TRANSDUCER \$20 oil COUPLANT DRILLES hole. TESE Rate. CALIBRATION DATA _ INSPECTION TECNIQUE MANUAL SEARCH -100% COVERAGE. DESCRIPTION OF RECORD OF EXAMINATION RESULTS P.Z. WELD Y- ENTIRE WELD REPAIREd by BACK gouging, RE-WELded - RE-ULT. ENTIRE WE'd. Ronald R. Delle T-TC-1A LEVEL RECORD OF RE-EXAMINATION INSPECTOR SNT-TC-1A LEVEL.

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Pulln.an Power Products ล ULTRASONIC FLAW DETECTION RECORD DATE 6/9/79 JOB NO. 7935 PIECE NO. 1MS088812 - 68-1 "F"NO. 3906 STL . MATERIAL EXAMINATION PROCEDURE NO. 1X-37 1X-37 ACCEPTANCE CRITERIA - USIP-11 KRAUTKRAMER ECUIPMENT MODEL NO. 1/2 xh 45-2.25 Mhz-TRANSDUCER #20 oiL COUPLANT PLATE. LOLE-DRILLED TESE CALIBRATION DATA __ INSPECTION TECNIQUE MANUAl SEARCH - 100% COVERAGE. RECORD OF EXAMINATION RESULTS HANGER ASSY. WELds DE - COMPLETE. INSPECTOR Ronald R. Delle NAME OF T SNT-TC-1A LEVEL. RECORD OF RE-EXAMINATION NAME OF INSPECTOR. SHT-TC-1A LEVEL. Exhibit D - Page 17 of 23

Pullman Power Products ULTRASONIC FLAW DETECTION RECORD DATE 6 14 79 JOB NO. 7935 F. NO. 3906 Fer F-3874 PIECE NO. 1-MS088812-68-1 MATERIAL EXAMINATION PROCEDURE NO. 1X-37 1X:37 ACCEPTANCE CRITERIA KLAUTIKRAMER USIP-11 EQUIPMENT MODEL NO. 2.25 Mhz - STRAKHT BEAM TRANSDUCER # 20 oil COUPLANT CALIBRATION DATA TEST DESCRIPTION OF INSPECTION TECNIQUE MANUAL SEARCH - 100% COVERAGE. DESCRIPTION OF RECORD OF EXAMINATION RESULTS MANUAL SEARCH with STRAIGHT BEAM ON IT * 1 from WELD & TO A "ADjaCENT BASE MATERIAL. CEPT NAME OF INSPECTOR Konald & Delke SNT-TC-1A LEVEL. RECORD OF RE-EXAMINATION NAME OF INSPECTOR. SNT-TC-1A LEVEL. Exhibit D - Page 18 of 23

Pullmar. Power Products ล ULTRASONIC FLAW DETECTION RECORD DATE 6/14/79 JOB NO. 7935 FOR F"NO 3906 PIECE NO. 1-MS088812-68-1 MATERIAL EXAMINATION PROCEDURE NO. 1X-37 18-37 ACCEPTANCE CRITERI - KRAUTKRAMER (ISIP-11 ECUIPMENT MODEL NO. 45° 60° - 12 x 12 - 2.25 Mhz -TRANSDUCER #20 011 COUPLANT TEST PLATE hole -Peilles CALIBRATION INSPECTION TECNIQUE MANUAL SEARCH - 100% COVERAGE ON PIPE SILE DESCRIPTION OF RECORD OF EXAMINATION RESULTS WELd (, 45° g 60° servech from pipe side (IT") only-Konal R. Delle SPECTOR. TC-1A LEVE RECORD OF RE-EXAMINATION NAME OF INSPECTOR. SNT-TC-IA LEVEL Exhibit D - Page 19 of 23



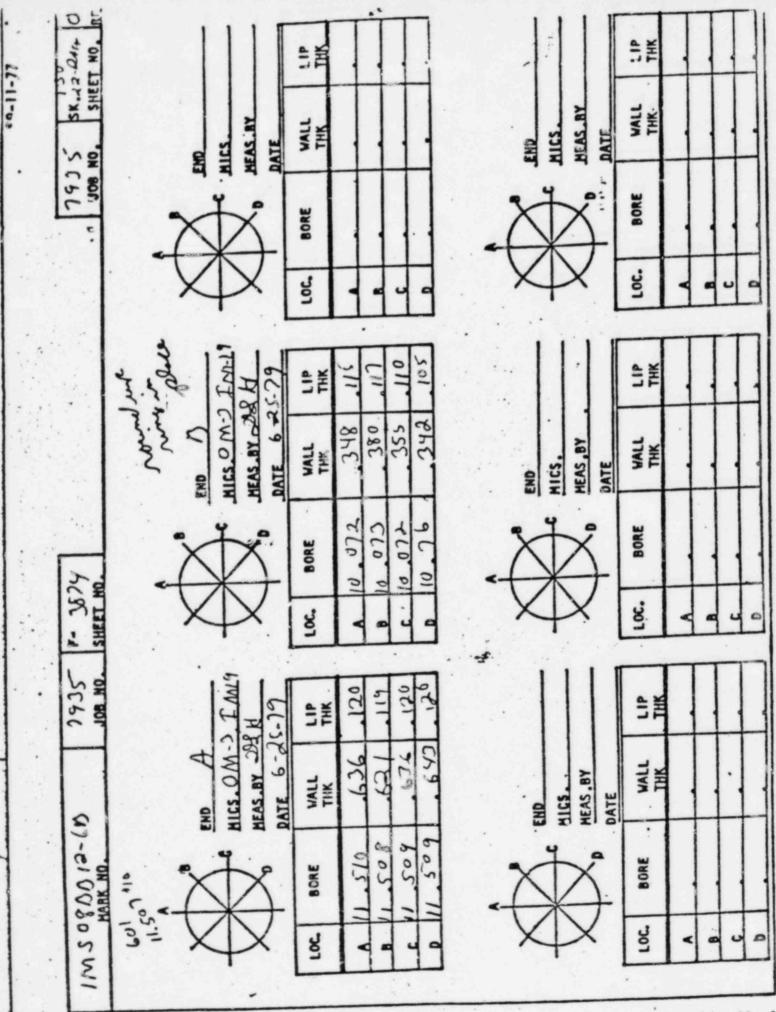


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S Exhibit D - Page 22 of 23

VISUAL FINAL INSPEC				157		PR
JOB NO. 2935 PIECE NO. 11 SOS BO12-60 F-SHEET NO. 3874	3					COMMENTS
S CHECK POINTS	,	YES	. NO	N.A.	-	
ALL PRIOR OPERATIONS HAVE BEEN RERFORMED AND APPROVED AND SIGNED OFF ON THE TRAVELER.		-				
SPECIFIED MATERIALS HAVE BEEN INSTALLED IN THE PIPING SUB-ASSEMBLY.	ŀ	-				
ALL STAMPING DISPLAYED ON THE PIPING SUB-ASSEMBLY IS ACCURATE AND CORRES- PONDS WITH THE INFORMATION PRESENTED ON THE FABRICATION SHEET.		-				
FINAL DIMENSIONAL EXAMINATION HAS BEEN PERFORMED AND THE DIMENSIONAL INFORMATION HAS BEEN RECORDED ON THE FABRICATION SHEET.		1				i ari
CLEANING HAS BEEN PERFORMED IN ACCORD- ANCE WITH THE REQUIREMENTS OF THE GOVERNING SPECIFICATION.		-				-
WELDER SYMBOLS AND RADIOGRAPHIC POINT LOCATIONS HAVE BEEN ACCURATELY APPLIED AND ARE COMPLETE.		-	-			
CONTOUR, FINISH, AND HEIGHT OF WELD CROWN COMPLIES WITH THE REQUIREMENTS OF THE GOVERNING SPECIFICATION.		-				
ALL ACCESSIBLE INSIDE WELD BEADS HAVE COMPLETE JOINT PENETRATION AND ARE FREE FROM UNDERCUTTING.		-				
FIELD WELD END PREPS ARE MACHINED TO THE CONFIGURATION AND TOLERANCES DICTATED ON THE MACHINING SKETCH.		-				
PIPING SUB-ASSEMBLY IS FREE FROM DAMAGE, EXCESSIVE PITTING, AND UNACCEPTABLE SURFACE DEFECTS.		-				
ASSEMBLY HAS BEEN INSPECTED AND APPROVED BY THE AUTHORIZED INSPECTOR AND/OR THE CUSTOMERS SURVEILLANCE REPRESENTATIVE.		-				
THE APPROPRIATE CODE STAMP HAS BEEN APPLIED.		-				•
ASSEMBLY HAS BEEN CAPPED, PAINTED, AND IDENTIFIED IN ACCORDANCE WITH THE REQUIREMENTS OF THE GOVERNING SPEC- IFICATION.		-				
6.1 INSPEC	26-79 TED E	ED_	8)m	In so	1 7 Hel 2 mer J - 79
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Exhibit D - Page 23 of 23

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1.in 50 15 2 NC*.CONFORMANCE REPORT NO. E-1911 F4GE _____ DF 14 11 47 25 4 SUPPLIER CONTRACTOR MANE: 3. PO'CONTRACT NO. : ASTALLATION NAME: PULLIMEN FINER. CG { 1 2171 5.1.1.1.1.1.1 Fift SFINLS 72 7. DATE: & SPECIFICATION NO. E ISFELTOR: ASI 7-5-79 11-2255 5412/18 J. DEERMESTER YES 11. DISPOSITION MIST RUCTIONS JUSTIFICATION 10. DISPOSITION S SECTA -C'LEF LEVEDIF FE BRIKE MENTS MATERIAL TO BE RILLASED WITH APPROVED EGUIMENT PERFORM LIGUID PONETI TEST ON ALL WILLS FRULT: SPOOLS WERE RILLED OFF Pristern Visitat inspiret OF JRUCK ON TO GROUND OF wild end preps. AND STRIKING OTHER SPORLS. Accept on Basis OF SFICI- #'3 ... Rewark. Inspectical Itenus (52) 1MS08BB12-6B 1MS09EA12.1AH Should Any PIPE Spool IMSOYBA 12-5BH DHE TO INSPECTION 1MS 11 B12 -78H () A Seperate IMSIO BAJZ-ICH non-ecute Stand to the stand -SEZ PEV-1, 7-10-29 16 REPAIR DE SITIONS) 12. REVIEW BOARD (RED RED ON ALL DN END DATE THE DAE CG&E QA.85 CG&E SPONSOR ENGR DATE 581 13. REPAIR/REWORK INSPECTOR/ENGINEER DATE 15. CORRECTIVE ACTION 14 CAUSE pipe spoors were desped from no corrections . carriers truck Bal to ground. Regid. THIS occurred After requila - ch as The working h result I untuction given to trucks Exhibit E druise. KEI FORM

NONCONFORMANCE FEFCRT NO _1-1011 F+Y 1 ____ F+GE ____ OF LEFE EFETATION 4 SUFFLIEF CUNTEACTUE NAME: 3. FO CONTRACT NO. THE MEALLATICK ND 2 COSTASTALLATICA NAME: Pullran Fower Fire Spools CG&E 2171 Fie Telow E. SFECUTICATION ND. ASME E TELT CAFLAN NO.: | E PASTELTOR: 7. DATE: E H-2255 YES NOL J. Deervester 7/5/79 CAN 118 S THEF IS IN OF NEWLON CRWANCE 11. DISPOSITION INSTFUCTIONS JUSTIFICATION 10 DISPOSITION "+C fter attbevorges dith approved with approved 1 PERFERM RT EXAMINE equi; ment OF ALL wells. Fault: Spools were rolled off of truck on to 6) Perfram VISUAL ERAmini OF WELD ENd props. ground and striking other spools. Conouk. Accept on BASIS OF In-Spool Numbers SPECTION ITEMS () (2) 115 OELB12-6B 1MS CHEA12-1AH EALL DUE to The Inspectic 1MS CEBA12-568 115 11512-7BH () 1 (2) at signate ----an-conformance will ssud? REVIEW BOAND (REQUIRED ON AC COURS DEPAIR DISPOSITIONS) 5 14 B 1 42 -T -10 SEE REV. 2 7.31.79 EI CONSTRUCTION ENGR. DAT R. Jur -7-1 LID The ALL NIA KEI DAE CG&E D.A.&S. DATE DATE CG&E SPONSOR ENGR DATE SAL 13 REFAIR/REWORK COMPLETE AND ACCEPTABLE DATE INSPECTOR/ENGINEER 15. CORRECTIVE ACTION no conpective befor Regib. 14 CAUSE Pipe sports wer droped from carriers truck Buil to ground. THIS occurred after regular working heres and as The working result of a mis - interputations of instructions given to the driven Exhibit F - Page 1 of 1 HINCOFORM N 3540 KA" [& FIELD (7). COAE (4). SEL (1). A.I. (1). DA FILES (ORIG.)

Contractions Charte GA, the D Reference: C4CM1-014 A ____ Deficiency/Deviation ____Clarification Calibration/Test Record Subcontractor Surveillance Surveillance Information c Audit/Follow-up GENERAL OBSERVATIONS/DESCRIPTION: SYSTEM MAIN STEAM NR E-1911 Required RT of Kellogg Spool pieces. Sport piece MS-08-BB-12-6B WELd No X. had rejectable Surface indications. SPool piece MS-11. B-12 - 7 BHChad a Rack of Fusion Rejectable indication . PLease advise Us about Dispositioning Report Prepared By: ACPALLON Those Rejections. Report Prepared By: ACPALCON If Deficiency is Nonconforming in Nature, List: 1. Reference Drawing, Spec. or Std._ 2. Specific Location CORRECTIVE ACTION STATEMENT

Corrective Action Verified By:

Date

Orgenisations CESE EL Teference: CACM1-C Clarification _ Tefficiency/Levistion Gelibration/Test Fecor X Adit/Feller-up Subcontractor Surveillance Surveillance Information GENERAL OBSERVATIONS/DESCHIPTION: SYSTEM AIS . VISUAL INSPECTED ALL FILLET WELDS ON SF. PIECES NUMBERED IMS 08 83 12 - 63. IMSOGBATS IMSOBBAID-SBH, IMSINBIZ-JEH AND IMS 108 A12 - ICH AS PER NRE-1911 REV3 AI FOUND VISUALLY ACCEPTATICE WITH NO APPARENT CRACKS Report Prepared By: 6. Mc CANN Date 8-8-74 If Deficiency is Nonconforming in Nature, List: 1. Reference Drawing, Spec. or Std: ... NIR E-1911 LASS & FAINT 2. Specific Location 37.44.7.9 CORRECTIVE ACTION STATEMENT No Corrective Action Required 8-8-75 Corrective Action Verified By: Exhibit H - Page 1 of 1

LANLE FREINCERS, INC. NONCONFORMANCE REPORT ND. E-1911 Rev 2 PAGE_ OF WM H ZIN MER FOWER STATION 4. SUPPLIER/CONTRACTOR NAME: 3. PO/CONTRACT NO. 2. DWGANSTALLATION NAME: WSTALLATION NO. velow CG&E 2171 Pullman Power Pipe Spools WHECTION PLAN NO .: B. SPECIFICATION NO. 6. INSPECTOR: 7. DATE: ASME 111 118 YES NO 7-5-79 J. Deerwester H-2255-IN SCRIPTION OF NONCONFORMANCE 11. DISPOSITION INSTRUCTIONS/JUSTIFICATION 10 DISPOSITION IN TREMENT: D PREFORM RT FRAMUNO 1100 OF ALL BUTT-WELES Material to be unloaded with oved byuipment 2 PORFORM VISUAL ERIOMILIAT OF ALL FULET- WIELDS" 1 A1'LT: + Document findings spools were rolled off of truck in to ground and striking other spools on S.R. REPORT Rewook .porl Numbers-Accept on BASIS OF 1HS 081812-6B INSPIECTION RESULTS HEMS 1MS 00%A12-1AH 8(2) 0 1MS 0811A12-5BH 1S 11112-7BH Any pipe Spool SHOULD 1MS 1011A12-1CH FAIL INSPECTICALS m 50 Non conformin .P 13SUrc . "W BOARD (REQUIRED ON ALL ACCEPT/REPAIR DISPOSITIONS) 27-31-79 KEI CONSTRUCTION ENGR. DATE 13333 KEI DAE 0.A.85. DATE SPONSOR ENGR DATE DATE CG&E BEUDINK COMPLETE AND ACCEPTABLE See Exception NR E-1997 INSPECTO, JONGINEER 15. CORRECTIVE ACTION Pipe Spools were dropped from carriers truck bed to ground. No corrective action required. This occurred after regular working hours and as the result of a misinterpretation of instructions given to truck drivers Exhibit I - Page 1 of 1 1 HELENDIANO OF A . A TI FEAR IN SHI MI AT MI DA FUTE INDIE I

ANSFR ENGINEERS, INC. NONCONFORMANCE REPORT MAL IT ZIMMER POWER STATION NO. E-1997 PAGE ____ OF __ ISTALLATION NO. 2. DWG/INSTALLATION NAME: 4. SUPPLIE R/CONTRACTOR NAME 3. PU/CONTRACT NO. see Below Pipe Spools CGAE 2171 Pullman Power SPECTION PLAN NO .: 6. INSPECTOR: B. SPECIFICATION NO. 7. DATE: ASME Pal 8-9-79 H2255 YESD NOT 9. DESCRIFTION OF NONCONFORMANCE 10. DISPOSITION 11. DISPOSITION INSTRUCTIONS/JUSTIFICATION REQUIREMENT: Material unloaded with CG AF THE DISPESITION approved equipment. R.m. Dorr 8-13-7 Fault: Spools were rolled off truck Accept-as. is 1) 2/1 on to ground and striking other spools ecuted Were as per E-1911 Rev.2 idion abied WP.-2 Disposition 2 all fillet welds 100% visually inspected accepted as per Maisnetic 100% SR 2251 Test M400 5 20-Disposition 1 completed all rusis a CGIA butt radiographed (1MS O8EB 12-6B had rejectable surface indication-open) 1.2 (1MS 11B12 7BH had rejectable lack of fusion-open) (IMS 10BA12 1CH had rejectlack of fusion-open) (1MSO9BA-12 laH- Acceptable Butt & Filets-Closed) (IMSO8BA-12 5BH-Acceptable Butt & Fillet-Closed) 12. REVIEW BOARD (REQUIRED ON ALL ACCEPT/REPAIR DISPOSITIONS) 1771 KEI CONSTRUCTION ENGR. DATE 132 DATE CG&E SPONSOR ENGR DATE CG&E Q.A.&S. DATE KEI OAE 13. REPAIR/REWORK COMPLETE AND ACCEPTABLE **INSPECTOR/ENGINEER** DATE 14. CAUSE 15. CORRECTIVE ACTION Suppliers Compiere misundustood Consider actions her instructions concernai been Tarcan By cancer = incertant. looding of pupi spoke Coursen Exhibit J - Page 1 of 1 KAISER FIELD (7), COAE (4), SAL (1), A.I. (1), QA HILES (ORIG.) KELFORM NO. CN 3670 Hev

VE-10-19 C-1111 KAISER ENGINFERS, INC. NONCONFORMANCE REPORT NO. E-1997 PAGE OF WIM H. ZIMMER POWER STATION 4. SUPPLIE B/CUNTRACTOR MALLE . DWG/INSTALLATION NO. 3. PO/CONTRACT NO. 2. DWG/INSTALLATION NAME: See Bilour Pipe Spools CG&E 2171 Pullman Power TID: PLAN NO .: 6. INSPECTUR: 7. DATE: 8. SPECIFICATION NO. . 11 ASI Pallon 8-9-79 H2255 YES NOD DESCRIPTION OF NONCONFORMANCE 10. DISPOSITION 11. DISPOSITION INSTRUCTIONS/JUSTIFICATION EQUIREMENT: Material unloaded with CGAE TO DISPESITION pproved equipment. Rm 8-13-79 .Der ault: Accept-as .: s Spools were rolled off truck in to ground and striking other spools reluin1 s per/L-1911 Rev.2 Disposition 2 all fillet welds Dife isually inspected accepted as per 1 Maine 2 10.0 Class C (1)R 2251 Tertad 1140 0 Disposition 1 completed all utt radiographed (1MS 08BB 12-6B had ejectable surface indication-open) MS 11B12 7BH had rejectable lack of N.usicopen) (IMS 10BA12 1CH had rejectble k of fusion-open) (IMS09BA-12 Welds rejected by radiograph are covered AH- Acceptable Butt & Filets-Closed) by NCR E. 2020. The disposition of Welds IMS098A-12-1AH and IMS088A-SOSBA-12 5BH-Acceptable Butt & Filletis acceptable losed) REVIEW BOARD (REQUIRED ON ALL ACCEPT/REPAIR DISPOSITIONS) 10/18 oproved with comment Smi KEI CONSTRUCTION ENGR. DATE 10-12-79 E, 10/10 quas 10 26mm R. In S&L DATE CB&E SFONSOR ENGR DATE CG&E Q.A.&S. DAE KEI DATE REPAIR/REWORK COMPLETE AND ACCEPTABLE INSPECTOR/ENGINEER DATE CAUSE 15. CORRECTIVE ACTION Conscher actions her Suppliers Complete misundested cance Instructions ben Torcom B C neilist. pypi splat Guera Exhibit K - Page 1 of 1 PARENE 11 (1), COAT (4), 531 (1), A 1, 61, GA FREES (ORIG) KI 1 8 **** CN 31.70

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