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'82 SEP -9 A10:49

U. S. Nuclear Regulatory Commission

In the Matter of  
CPCo. Midland Plant  
Units 1 & 2

OFFICE OF SECRETARY *emp*  
DOCKETING & SERVICE  
BRANCH  
Docket Nos.  
50-329 OL  
50-330 OL

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

STAMIRIS MOTION FOR PARTIAL INITIAL DECISION ON QA ADEQUACY  
IN SOILS REMEDIAL WORK PRIOR TO COMMENCEMENT  
OF REMEDIAL UNDERPINNING EXCAVATIONS

9/4/82

Due to the reported violations of established QA/QC procedures for soils remedial work, the failure to institute proper QA/QC procedures for that work, the reported violations of NRC/CPC agreements and of the Boards April 30, 1982 Order regarding soils remedial work; the question of Consumer's QA adequacy with respect to soils must be resolved by this Board prior to the commencement of excavations for remedial underpinnings if public health and safety is to be protected.

ISSUES BEFORE THE BOARD

All parties in the OM-CL proceeding have addressed QA beyond soils due to the terms of the 6/5/81 QA Stipulation, since the NRC based their reasonable assurance of QA adequacy (Stipulation part 3) upon evaluation of the period from December 6, 1979 to June 1, 1981 during which little soils work was occurring. Yet the more narrow question of QA adequacy with respect to soils is the urgent question presently before this Board. This question, originally raised in the December 6, 1979 Order Modifying Construction Permits, must now be resolved as soon as possible in order to determine "the degree to which and the manner in which soils related construction activities (particularly remedial actions) will be permitted to continue"<sup>1</sup>

<sup>1</sup>Letter 4/30/82 Order, p. 9.

if these Board considerations are to remain viable.

The Board states in its April 30, 1982 Order (p. 7) that they have not yet completed their review of the second hearing issue "ie whether and, if so, to what extent the Modification Order should be sustained." This key issue is described by Consumer's as "whether the safety issues (giving rise to the facts set forth in part II of the Modification Order) have been resolved so that the QA program with respect to soils is now being properly implemented and there is reasonable assurance such implementation will continue through the construction process."<sup>2</sup>

The December 6, 1979 Modification Order sought prohibition of soils activities until the question of QA adequacy with respect to soils and the related safety questions were resolved. These QA adequacy/safety questions remain unresolved in late 1982, yet the complex and difficult soils remedial work which the Order sought to prohibit has been permitted to begin in the interim due to the wording of the Order.

The unresolved safety questions associated with the issue of soils QA adequacy, of renewed concern due to the course of recent events<sup>3</sup>, must be considered before the presently projected December 1982 QA hearing dates or they will, by that time, become moot questions as the soils remedial work in question will be irrevocably underway.<sup>4</sup> For the imminent underpinning excavation work will certainly commit the applicant to this course of remedial actions once it is begun, in a manner unlike the other prerequisite remedial steps previously approved by the Board.

As most recently and simply defined, the "QA" question before us is whether the soils remedial work will be properly implemented (as opposed to the "technical" question of whether that work is theoretically feasible).<sup>5</sup> A hearing conducted

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<sup>2</sup>CPC findings, p. 36.

<sup>3</sup>see attachment A.

<sup>4</sup>During the 8-14-82 site tour we were informed that the excavation work was expected to begin within a week as the baseline data measurements had been completed. On 9-1-82 Mr. Ross Landsman informed me the excavations had not yet begun.

<sup>5</sup>Judge Bechhoefer's description in 9-1-82 conference call.

to determine whether the soils remedial work is likely to be properly implemented can only be meaningful if conducted before that work takes place.

To await a December QA hearing and an overall (QA adequacy-technical adequacy) decision in 1983 as presently projected, would leave us with the untenable situation of putting the answer (ie. continuation of soils remedial work) before the question (whether it is likely to be performed safely). In so doing, the Applicant's scheduling needs would be placed ahead of public health and safety needs.

Although soils remedial work has been approved prior to resolution of the related safety questions before in this proceeding, it has up till now been of a relatively minor nature and has been approved in this fashion because it did not constitute an irreversible commitment to the soils remedial work to follow.<sup>6</sup> However the very nature of the excavation work and the proportions of this underpinning job certainly qualify it as the major task of the soils remedial work at issue, from which there is no going back. Therefore, to allow the underpinning excavation work to go forward prior to the resolution of the related QA/safety questions by this Board, would be tantamount to prejudging the entire proceeding.

The scheduling needs of Consumer's Power Co, no matter how pressing, cannot be placed ahead of the unresolved questions affecting public health and safety. In a case involving the Midland plant, an Appeal Board affirmed "under the Atomic Energy Act, the Commission responsibility is to protect the public health and safety, not the pocket-books of owners or customers of electric utility investors."<sup>7</sup>

This Board has listened to CPC and NRC witnesses discuss the technical feasibility and theoretical adequacy of the underpinning remedial work, but that has no bearing upon the practical implementation of that work. The Board, in fact, found the QA aspects of the proposed underpinning work to be conspicuously lacking<sup>8</sup>

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<sup>6</sup>7/7/81 tr. 1133-1137

<sup>7</sup>ALAB 458, 2/14/78, 7 NRC 4 p. 476, CPC Units 1 and 2, Midland.

<sup>8</sup>ASLB 2/5/82 Memo, tr. 7122-7128.

and their underpinning QA questions remain unresolved today. To have assurance that any plans will be carried out safely, this Board must first establish that there is an effective QA program to accomplish those plans.

#### VARIOUS PROPOSED HEARING PLANS

Unlike the after-the-fact December QA hearings currently envisioned, the pre-excavation QA hearings I propose would allow fair consideration of ultimate hearing outcomes and options to all parties. I would have the Board consider the now urgent QA question of the December 6 Order, as formulated by Consumer's, "whether the safety issues . . . have been resolved so that the QA program with respect to soils is now being properly implemented and there is reasonable assurance such implementation will continue through the construction process," (particularly the soils remedial work at hand). An expedited partial initial decision in the Applicant's favor on the soils remedial aspect of QA adequacy could allow the soils remedial work to go forward with only slight delay and with the added assurance that the public safety questions associated with the soils remedial work had first been resolved. Consumer's themselves sought this assurance for the public in their 9/2/81 Motion for an Initial Partial QA Decision.

The urgency of the QA question which I assert is reflected in the public statements of Mr. Keppler at the recent SALP meetings. Regarding the soils remedial work he said, "clearly something is wrong, its not proceeding as it should proceed." At this point, he said, "I have to wonder--can Consumer's do the job?" He added that NRC was "not comfortable about where we stand as an agency" and that he personally felt "very uneasy" about his 1981 testimony before the ASLB.<sup>9</sup>

As a result of the negative SALP rating, and the continuation of soils remedial work problems up to that day (6/21/82), Mr. Keppler announced the formation of a special inspection team to oversee Midland's work. Shortly thereafter he called

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<sup>9</sup>6/21/82 SALP meeting, statements as reported in 6/22/82 Midland Daily News.

for a reopening of the OM-OL hearings to reconsider his QA reasonable assurance testimony. Mr. Keppler's testimony was expected by late August and "Mr. Paton advised that there were substantial differences of opinion between the Applicant and the Staff regarding certain factual material."<sup>10</sup> These reopened QA hearings, as first entertained, would have properly brought the facts and evidence regarding the NRC-Consumer's differences before the Board for their judgement and resolution.

But by July 12, 1982 a dramatic change in the form and scope of the reopened QA hearings was announced by NRC counsel, Mr. Paton, in a conference call on the subject. "The Staff now advised that Mr. Keppler wished to confer with certain high-level NRC officials, formulate suggestions with respect to Consumer's QA/QC program, and present those suggestions to high-level Consumer's officials (Selby and Cook). According to the Staff, if Consumer's accepted the NRC suggestions (to which CPC counsel indicated there would likely be "a very quick turn-around") then the factual questions now in dispute between Consumer's and the Staff would become of lesser importance. The Staff and Consumer's could then file testimony (perhaps simultaneously) concerning the proposed QA/QC solutions."<sup>11</sup>

In the hopes of avoiding lengthy contested hearings, and perhaps as the only way to allow construction to proceed at the plant, the NRC, Consumer's, and the Board, are willing to accept hearings based once again on subjective judgements and conclusory statements about future QA adequacy and "proposed QA/QC solutions."

In 1981, the hearings held to resolve the QA/safety questions of part III of the December 6, 1979 Order regarding "the adequacy of the remedial action to correct the deficiencies in the soil construction under and around safety related structures,"<sup>12</sup> were necessarily conducted in the abstract future form, since that

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<sup>10</sup>ASLB 7/7/82 memo, p. 3.

<sup>11</sup>ASLB 7/13/82 memo, p. 2.

<sup>12</sup>12/6/79 Order, p. 4.

work had not begun. But the question of QA adequacy with respect to soils remedial actions, which is before the Board in 1982, is in the very real present tense.

Soils work has resumed and so have the related QA problems. Once again we have before us evidence of the state of QA with respect to soils. This evidence is available in the form of CFR Appendix B violations, inspection reports, nonconformance reports, audit reports and findings, stop work reports, and their manner of resolution. We have no need in 1982 to look to the future to answer the question of soils QA adequacy--and whether the soils remedial work is likely to proceed safely and carefully according to regulations. We can consider all the relevant evidence and now act. Is the soils remedial work being properly implemented, and is Consumer's QA/QC implementation effective in maintaining the requisite standards of safety and conservatism in this work?

To conduct QA hearings based instead upon reasonable assurance for the future according to high level QA/QC improvement plans and solutions, after the work in question was irrevocably underway, would be to make a mockery of the serious public safety questions at issue in this proceeding. For there is no future left nor time for QA improvement when the plant is almost finished and the soils remedial work is underway.

The QA deficiencies which have plagued this plant since the early seventies have been repeatedly condoned and overlooked on the basis of the promise of reformation, and perceived improvements which have allowed the NRC to maintain reasonable assurance for the future time and time again.<sup>13</sup> When the future comes to pass (as it has in this proceeding) only to disprove the assurances given in part 3 of 6/5/81 QA Stipulation, the NRC merely forgets the past and present, and moves on to the future once more.

In the case before us now, the continued inadequacy and deficiencies of Consumer's QA as documented in the 1980-81 SALP evaluation and subsequent I & E reports:

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<sup>13</sup>history p. 9-10, ASLM 4/30/81 order.

as addressed by the Board in their 4/30/82 Order and 7/7/82 Memorandum; as discussed in the 4/15/82 Spessard memo; as addressed by Mr. Keppler as recently as 6/21/82; as reflected in the continuing record of NRC and audit findings regarding soils; and as discussed in the 8/20/82 Landsman memo, cannot be adequately resolved with a new QA Stipulation drawn up to reduce the importance of "factual questions now in dispute" (7/13/82 memo) by shifting the focus from the present to the future. The Board's directive in its 7/13/82 memo to "include prior differences" and their manner of resolution in prepared testimony, could only be of value if the work in question awaited the consideration of those differences.

The time has come for the NRC to follow the plan Mr. Keppler announced at the November 1980 SALP meeting--that is to lay out all the facts before the Board (leaving conclusions aside) and let them decide the increasingly difficult question 'whether QA is still defensible?' This intention similarly repeated by Mr. Keppler at the close of the 6/21/82 SALP meeting would have been met in the reopened QA hearings if they had gone forward as originally planned (contested QA proceedings between the Staff and the Applicant following August testimony). But that intent is lost in the new hearing plans (7/13/82 memo).

The events surrounding the August 12, 1982 stop work as described in the 8/20/82 Landsman memo on the violation of the ASLB April 30th Order, make a contested hearing all the more imperative now. It is the intent of this motion to seek a hearing, based on a review of all the evidence before us concerning the state of QA adequacy today, as opposed to hearing statements about expected improvements, CPC commitments, or NRC suggested "QA/QC solutions" for Consumer's, as anticipated in the 7/13/82 Board Memorandum. It is the intent of this motion that hearings on the narrow question of QA adequacy with respect to soils, must precede the soils remedial work (ie. underpinning excavations) they seek to consider, if public health and safety is to be protected.

RESPONSIBILITY TO DECIDE ISSUES OF THIS PROCEEDING  
LIES WITH ASLB, NOT NRC STAFF

NRC regulations provide that "a Licensing Board may not delegate its obligation to decide significant issues to the (NRC) Staff."<sup>14</sup> It must follow then that neither should the NRC take upon itself the decision of the key QA/safety question of this proceeding in the form of a reasonable assurance judgement.

Such conclusory judgements must be left to the Board. The parties are obliged to bring forward all the relevant evidence on the question of QA adequacy to the Board for their decision, upon completion of the review of that evidence. The burden of deciding the question of QA adequacy in this case should not and does not lie with one party (the NRC) or one person (Mr. Keppler). The burden of proof of QA adequacy lies with the Applicant. And the continuation of the soils remedial work, particularly the irreversible underpinning excavation steps, cannot be permitted (according to the terms of the December 6, 1979 Order and the NRC system of regulations) in the absence of such a finding of QA adequacy by this Board.

The Board has not yet resolved "whether, and if so, to what extent the December 6 Order will be sustained" (as stated in its April 30, 1980 Order) in order to determine "the degree to which and the manner in which soils-related construction activities (and particularly the remedial actions) will be permitted to continue."<sup>15</sup>

Yet the present course of action regarding soils remedial work at the plant, leaves the implementation of this hearing issue, and its underlying decision, entirely up to the NRC staff. This becomes particularly unfair when we approach the irreversible underpinning excavations immediately at hand, without the resolution of the essential QA safety questions related to that work. It is unfair to all parties and to the public dependent on this hearing process.

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<sup>14</sup>NRC Practice and Procedure Digest, Suppl. 1 to Digest 2, February 1980 p. 12; Public Service of Indiana, Marble Hill 1 and 2, ALAB 461, 7 NRC, 313-318 (1978).

<sup>15</sup>ASLB 4/30/80 Order, p. 7, 9.



Because the NRC has met with the Applicant and progressed in their evaluation of the technical and theoretical adequacy of the soils remedial fixes (primarily an NRR responsibility), it does not mean that the NRC has simultaneously progressed in their approval of the practical implementation of the soils remedial work (primarily a Region III, I & E responsibility) as related to the question of QA adequacy. In fact, the I & E assessment of QA adequacy appears to have regressed during the course of the soils remedial work.

Implementation of the remedial underpinning excavation work cannot proceed on its theoretical feasibility alone. Mr. Landsman and the other members of the I & E Staff closest to the remedial work, are attempting to do a conscientious and careful job of determining which remedial work should go forward, nevertheless they should not bear the burden of deciding the outcome of the complex and difficult QA/safety issues of this proceeding. Yet this is the practical reality of the present situation. The flow of NRC-CPC documents, the board notifications, and memos from Region III indicate a need for Board attention and help in resolving these difficult questions.

EXPEDIENCE AND SAFETY RESULT FROM  
PARTIAL INITIAL DECISION ON QA PRIOR TO EXCAVATION

In seeking a partial initial decision on QA, Consumer's asserted that "an early resolution of (QA) issues will benefit the public by assuring that the remedial work, when authorized, can begin promptly in accordance with the decision...If the Board issues findings in the Applicant's favor, the applicant can confidently direct resources to maintaining and improving its QA program and its implementation. If the decision outlines further requirements the applicant must meet, then resources can immediately be directed toward accomplishing them so that any authorized remedial work can begin promptly and in accordance with the Board's dictates."<sup>16</sup>

Thus the Applicant sought the Board's explicit prior approval for soils remedial actions in the form of a partial initial QA decision. That motion for a partial

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<sup>16</sup>CPC 9/2/81 motion, p. 5.

initial decision on QA prior to implementation of the soils remedial work, which was granted by the Board in 1981, is precisely the motion I am presenting today.

Because of significant new questions concerning QA adequacy which have arisen since 1981, the motion is all the more compelling today. As cited by the Applicant in the Douglas Point Case, an early decision benefits the public by obviating "wasteful expenditures of time and money", . . . and "by alerting the Applicant promptly" of the needs which must be met to ensure plant safety.<sup>17</sup> Consumer's adds, "Similarly here, a decision at a time early enough for the parties to effectively anticipate and ameliorate any concerns rather than retroactively take them into account makes the resultant benefit to the public (not just the Applicant) manifest."<sup>18</sup>

The fact that significant safety questions arose necessitating a reopening of the record on QA, only serves to strengthen the foregoing arguments presented by the Applicant. Awaiting a full (technical adequacy-QA adequacy) decision in 1983 as discussed during the August prehearing conference would be acceptable, perhaps even preferable in terms of an integrated approach, if the remedial underpinning excavation work were not permitted to proceed in the interim. But in the interest of expedience, it makes more sense to single out the narrowest QA issues (which will still protect public health and safety considerations) essential for resolution prior to implementation of the remedial underpinning excavations. Other QA and technical issues can be forestalled without compromising safety.

According to my hearing proposal, the time and effort spent working out a new QA agreement between the Staff and the Applicant would be saved. The contested hearing could then go forward sooner. The eventual QA hearings will probably be about the same length whether or not an agreement between NRC and CPC is reached as past QA problems and differences will be considered by intervenors with or

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<sup>17</sup>CPC 9/2/81 motion, p. 6.

<sup>18</sup>Ibid p. 6.

cases proceeds with this work beyond their own stopwork directives) these incidents are termed miscommunications or misunderstandings caused by varying interpretations of agreements.

Two investigations have been launched by Region III on the subject of Consumer's "possible misleading statements" and "possible violations of the Board's April 30, 1982 Order" involving soils remedial work.<sup>25</sup>

At some time we must at least consider the possibility that all these events weren't really misunderstandings at all, but were conscious violations of agreements and calculated risks undertaken because of pressure to push ahead and because of an expectation that nothing would be done about it anyway.

If these possibilities are not even considered, or the results of the Region III or Office of Investigation probes are not considered by this Board before the underpinning excavations are premitted to begin, then they might as well be dismissed altogether. For once again, inaction or failure to intercede would be interpreted by Consumer's as approval of the status quo and the soils remedial work will continue in the same manner as it has thus far proceeded.

The concerns of the Region III staff, Mr. Keppler, and this Board (in their April 30th Order) about Consumer's ability or willingness to carry out proper QA on their own initiative in the soils remedial work must be addressed now as it becomes increasingly apparant from the course of recent events<sup>26</sup> that the "Staff consultation and approval" method of handling soils remedial work which the Board set forth in their April 30th Order, is not succeeding in attaining the proper care and conservatism in the soils remedial work.

The manner in which the soils remedial events<sup>27</sup> took place and whether these events do or do not constitute violations of Consumer's own, the NRC, or Board

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<sup>25</sup>4/15/82 Spessard memo; 3/20/82 Landsman memo.

<sup>26</sup>see attachment A.

<sup>27</sup>Ibid.

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The concerns of the Region III staff, Mr. Keppler, and this Board (in their April 30th Order) about Consumer's ability or willingness to carry out proper QA on their own initiative in the soils remedial work must be addressed now as it becomes increasingly apparant from the course of recent events<sup>26</sup> that the "Staff consultation and approval" method of handling soils remedial work which the Board set forth in their April 30th Order, is not succeeding in attaining the proper care and conservatism in the soils remedial work.

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<sup>25</sup>4/15/82 Spessard memo; 3/20/82 Landsman memo.

<sup>26</sup>see attachment A.

<sup>27</sup>Ibid.

a reopening of the record on QA, which have occurred in the implementation of soils remedial work, cannot be put off until the remedial work in question is completed or irrevocably underway. The resolution of the December 6, 1979 soils QA adequacy question is imperative now.

For these reasons, as discussed in the motion, intervenor Stamiris moves that the Board:

1. Place a temporary work hold on underpinning excavation work, pending Board assurance of QA adequacy with respect to soils remedial work.
2. Request that the office of Investigation expedite their investigation of soils remedial events and possible violations of the Board's April 30 Order, in the interest of unusual safety and scheduling needs at Midland.
3. Direct all parties to begin preparing testimony at once on the question of soils-remedial QA adequacy, based upon evidence currently available.
4. Establish the earliest possible hearing dates for resolution of the soils-remedial QA adequacy issues prior to commencement of underpinning excavations.

Respectfully Submitted,

*Barbara Stamiris*

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cc. ASLB members  
W. Paton, NRC  
M. Miller, CPC  
Secretary, NRC.

ATTACHMENT A

CHRONOLOGICAL LISTING OF SOILS-REMEDIAL EVENTS

This listing provides the basis for my assertions about ongoing problems and violations in the soils remedial work (par. 1) on which this motion is based. In listing these events, I intend only to represent a brief showing of issues relevant to the hearings I propose--issues which represent open questions and differing viewpoints ripe for adjudication.

As such, the following soil related QA events or reports warrant ASLB consideration prior to continuation of the soils remedial work.\* Some of these documents reveal significant inconsistencies which must be resolved in order to afford an accurate understanding of the events they portray.

1. 10/13/81, QAR F120  
lack of Q procedures for FVIP and control tower supports (drilling and torquing of bolts)
2. 12/15/81 closeout, audit  
M01-241-02 finding 2  
justification of well fine monitoring by wrong Level inspector (CPC exh. 23)
3. 2/2/82, NCR M01-4-2-008  
40-foot hole drilled into Q soils
4. 2/26/82 incident  
3/8/82, NCR M01-9-2-038  
2 48-foot boring holes drilled into Q soils
5. 3/4/82 incident  
3/5/82 NCR M01-9-2-039  
improper drilling procedures at freezewayl involving use of grout and hole cave-in
6. 2/38 and 3/82 Inspection  
Report 82-05  
Criterion V violation: 4 instances, involving unapproved actions and lack of acceptance criteria in soils remedial work. Deviation: inadequately qualified personnel in civil/soils
7. 3/19/82 Inspection  
Report 82-06  
Criterion II and X violations: involving underpinning instrumentation

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\*I do not have 1981 inspection reports 81-13 thru 81-20, they should be considered to the extent they contain significant soils remedial information. (I will supplement later) NCRS involving cables should be considered to the extent they involve soils remedial work (QAR F180, M01-9-2-097, -098, -099).

8. 4/15/82  
Board Notice 82-39  
4/9/82 Spessard memo on QA inadequacy in soils remedial work and possible misleading statements
9. 4/20/82  
1980-81 SALP report,  
Related Keppler statements and events  
Category 3 rating in soils evaluation, Keppler statements at 4/26/82 and 6/21/82 SALP meetings, formation of Special Inspection team (6/21/82)
10. 4/12/82 Inspection  
Report 82-03  
Criterion V violation: 3 instances involving outstanding FCRS, BWST undermining unauthorized field changes
11. 4/21/82 NCR  
M01-9-2-051  
unauthorized excavation of duct bank undermines BWST valvepit
12. 4/28/82  
verbal stopwork  
Miller to Davis letter  
nonconforming drilling by Mergentime and lack of Bechtel control
13. 4/29/82 incident  
Bechtel NCR 4199  
nonconforming drilling, hitting ductbank and damaging electrical conduit and cables, no hold tags applied until 5/10/82
14. 5/19/82 incident  
Oral Communic. Record  
OCR 0168  
drilling of obs. well 4 encountered void at 10:30 A.M., resumption of drilling on well 1a allowed till 2:40 to finish job despite stop work FSW-22
15. 5/19/82  
Stopwork Order FSW-22  
issued at 1:00, 1:15 or 1:30 P.M. (according to various times given) after Landsman and Cook inspected void, Stopwork written retroactive to 4/28/82
16. 5/20/82 SCRE-51  
(attached to 5/26/82  
Bird to Hughes letter  
55e Safety Reportability Evaluation of 5/19 void: Extent of void doesn't appear to impact any safety related structures or utilities.
17. 5/21/82  
NCR M01-4-2-062  
Mergentime bypassed MPQAD hold points for weld inspections, no part corrective action
18. 5/24-27/82  
Nonconforming material Release  
conditional release to fill 5/19 void, and related documents attached to 6/30/82 Paton to Marshall letter
19. 6/25/82 letter  
Brunner to Board  
Inconsistencies exist between statements in this letter and the referenced supporting documents. (Bechtel NCR 4199 is dated 4/29/82--it is said to have prompted a 4/28/82 Stopwork Order.) There is no record of the 4/24/82 incident mentioned. The FSW 22 Stopwork Order was actually issued on 5/19/82 after void incident.

20. 6/7-9/82 Audit  
M01-206-2 finds civil soils group interface on soils remedial work acceptable
21. 6/22/82  
Stopwork Order FSW-23 violations involving grouting of underpinning brackets, MPQAD verbal stopwork at 12:15, but work continued till 2:35 when brackets were grouted
22. 7/7/82  
NCR M01-4-2-084 grout improperly mixed for Turbine wall bracket
23. 7/8/82  
QAR F187 sought advice (and possible relief) on necessity of periodic field tests
24. 7/9/82  
QAR F186 sought interpretation (and possible relief) of sample point depth in well
25. 7/21/82  
QAR 189 requests explanation of "71 individual deficiencies" on IPIN's (Inprocess Inspection Notices) between 7/8/82 and 7/19/82
26. 8/17/82 letter  
Brunner to Board QA organization change, J. Meisenheimer as QA Supt. for Remedial Soils Work
27. 8/20/82  
Keppler to Fitzgerald  
Investigation Request  
and related events 8/24 Landsman memo on violation of April 30 Board Order, related Stopwork (8/12/82) events, new communications vehicle and subsequent application, scope and purpose of investigation sought