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March 17, 1994

The Honorable Ivan Selin
Chairman
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Chairman Selin:

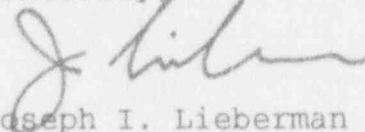
I have received the attached letter from Mr. Ron Gavensky, a former employee at the Millstone nuclear power plant. I would appreciate it if the Nuclear Regulatory Commission would determine the validity of the concerns raised by Mr. Gavensky in this letter.

Mr. Gavensky has told my staff that his primary concerns relate to the adequacy of the materials inspection procedures at Millstone, the adequacy of the inspections, and the qualifications of the inspectors. There also is a specific concern regarding the adequacy of bolts used at Millstone.

Please inform me and Mr. Gavensky of the results of your examination of his concerns.

Thank you for your time and consideration.

Sincerely,



Joseph I. Lieberman

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February 24, 1994

Ref. NRC Inspection Manual Proc. 38703 Section 02.02

A. Reviewing Licensee Reports:

VENDOR INSPECTION REPORTS

Problem, Northeast Utilities policy for Source Inspected Vendors, was at receipt! only look for obvious damage, check for all paperwork, and for a SAT source inspection report. If all the above was performed ACCEPT the material without any further inspection.

Numerous Source Inspected parts, were rejected by me during the past 13 years. Most recent, a entire lot of bolting from a California manufacturer was rejected.

The above situation indicates to me a number of over looked problems:

1. If the NRC looked at enough NON Conformance Reports (NCR'S) for Receipt Inspections, they should be questioning N.U. as to the validity of the Source Inspections performed.

2. If they performed the above, then they could have found, that the only inspector signing the NCR's for source inspection problems at receipt was me, because I had the knowledge and experience to recognize poor manufacturing practices , while performing a **"VISUAL FOR DAMAGE"** inspection. N.U. never defined Visual For Damage, and since the inspectors at receipt lacked the experience of recognizing poor manufacturing practices visually, they didn't reject the parts, unless they were damaged during shipment.

3. The NRC should have also questioned ,N.U. Auditor's

didn't trend this find.

SECTION 38703-02 (2.02) As a minimum- interview the following;

Receipt Inspectors, as to routine inspections I have never been interviewed by the NRC.

SECTION (02.03) Evaluate the licensee's program. Hiring of experienced, qualified "Receipt Inspectors" overlooked.

The NRC apparently payed little attention to Receiving Inspection practices at N.U.

N.U. Topical, was committed to ANSI N45.2.2 1972 with few exceptions. If the NRC looked into the operational portion of the Receipt Inspection Dept., from the beginning of operation, even up to 1989, at least some period of time, they should have seen, that N.U. could not have met the requirements they committed themselves to do , namely the following:

1. Under Section 2. General Requirements Para. 2.2.

Procedures and instructions **shall** be generated, used, and maintained current; these **shall** contain **sufficient detail** to provide for the listed items, a basic for packaging, design, shipping requirements, receiving, storage and handling procedures, implementation thereof, and inspection in accordance with this standard."

There were no detailed procedures or instructions, until recently on inspection of parts and components. There wasn't any emphasis on detail inspection such as actual dimensional, material verification, and visual for manufacturing defects.

2. Paragraph 2.3 **Results**, states inpart " Inspection and test results, **shall** be documented in a suitable test report

or data sheet. Each report shall identify the item to which it applies, the procedures or instruction followed in performing the task.

There were no **detailed** procedures or instructions. The inspections were performed utilizing the Purchase Order.

3. Section 2.5 **Measuring and Test Equipment.**

Para. 2.5. states in part "Selection, Inspection, examination, and testing equipment utilized to implement the requirements of this standard, shall be selected to determine conformance to specified requirements."

This section, could not be utilized until 1990, when the tools I purchased were required to be used by N.U. procedures. Training was then required, because the majority of so called "Receipt Inspectors" weren't familiar with **standard mechanical inspection equipment.**

Therefore if the proper inspection tools were not made available till December of 89-Jan. 90, how could the inspection reports say they met the requirements of the purchase orders, which specify what the manufacture specs are made to prior to this time??? The answer is clear. **THEY COULDN'T.**

I was able to write many non conformance reports, because I had over twenty years experience as a mechanical parts inspector in various manufacturing practices. I rejected by sight, poor manufacturing practices. My fellow workers, lacked the experience in this field, but followed instructions by leads, who **also lacked the necessary experience.** As long as the **paperwork** flowed, that all management wanted. Looks good on paper, who'll know the difference? The answer to that question is true, know one would know if there was anything wrong, because the paperwork was nice and neat. As far as anyone was concerned the parts met the purchase order requirements, because the paperwork says so. Report closed, end of subject, **RIGHT "WRONG."** I come along, fresh from the manufacturing trenches, and I'm appalled at the multitude of mechanic.

inspection errors, not paperwork but hands on errors.

4. **SECTION 5. "Receiving"** Para. 5.2.2 "Item Inspection" section (7) "Physical Damage" state "Visual inspection to assure that parts of items are not broken, cracked, missing, deformed, or misaligned and rotating parts turn without binding. Accessible internal and external area shall be free of detrimental gouges, dents, scratches and **burns**."

If the NRC had reviewed the Non Conformances written, they would have found that very few non conformances addressed this section for manufacturing defects, because as I continue to say, the Receiving Inspectors again lacked the ability to recognize the defects.

To further clarify the lack of knowledge by my fellow workers of manufacturing processes, the word "**burns**" as stated in the standard since 1972, did not sound to me as a manufacturing defect, I felt the word was misspelled or it was a misprint, but I thought the word should be "**burrs**", so I called the chairman of the section of the standard and explained technically my thoughts, he agreed, but I had to submit it in writing, so that he could bring it up at the next committee meeting.

5. **"PHYSICAL PROPERTIES"** were accepted by paperwork only, until N.U. bought the material analyzer in 1991.

"DIMENSIONS" Random visual inspections to assure that important dimensions, conform with drawings and specifications.

Again, mechanical inspections tools were not utilized until early 1990.

"WORKMANSHIP" "Visual inspection of accessible areas to assure that the workmanship is satisfactory to meet the intent of the requirements."

Prior to the end of 1992, how could a Receiving Inspector inspect for workmanship, when workmanship was never defined in any of the N.U. procedures.

6. SECTION 5.3 "Disposition of Received Items"

Para. 5.3.2 The definition of Nonconforming states in part "Items which do not conform to the specified requirements **shall** be identified as nonconforming with the system employed."

Section 5.5 "Correction of Nonconformances states in part " Items designated nonconformances or unacceptable for installation or use **shall** be **corrected** using authorized procedures, to meet specified requirements, or accepted "AS is." in addition to this, Subparagraph 5.5.1 " Reinspection states "Items that have been corrected shall be reinspected. The area of inspection may be confined to the area of the nonconformance. When it has been determined that the corrected item is satisfactory, the status of the item as denoted by the system shall be changed to acceptable an appropriate entry shall be made in the documentation after acceptance is determined."

It was common, for engineering dispositions of NCR's to "Use As IS", even though the items could be corrected. The trend to accept for operability was very clear. My concerns were for personnel safety (cutting oneself on sharp edges and burrs), my concerns were also that "Reliability" that burrs and excessive material could break off and become a floater." The NRC should have found most of the problems.

Dan I hope this helped you out.

Please I'm available anytime. I'm looking forward to our next conversation.

Ronald Gavensky 2/24/94

Ronald Gavensky
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Dan, in our discussion yesterday, I told of my feeling toward the **so-called WHISLEBLOWERS PROTECTION**, and you know there is a problem, because its seems to be trending. What is the **Senator** going to do about this? The system is not working, and neither am I. I want my life and completed goals back. With out us, this entire country would be in trouble. **PLEASE HELP US.**

I'll be waiting to hear from you.

PS

If I'm going to do the NRC's job for them, then I should also mention this. About the bolting, thats still under investigation, **that I found!**, you will notice I emphasized that I found, because my fellow **so-called qualified "RECEIPT INSPECTORS,"** inspected thousand and thousands of these bolts and accepted at least 99% of them. Check the files on Stone & Webster Transfers you'll find very few rejections, and those that you do find, the majority will be mine. Please realize, when I was put on the transfer of S*W material, which was a punishment move by my supervisor, it took me **FIVE MINUTES, FIVE MINUTES,** to find major defects in the bolting, a lot of the defects were accepted by my fellow workers and green tagged for use in **SAFETY RELATED SYSTEMS.**

I wish to explain, I'm not condemning my fellow workers, they didn't know what was going on, and they had know one to show them the correct way to inspect, they were following leaders, who also didn't know how to inspect parts. This is strickly a N.U. management problem, and a NRC problem for not recognizing it.

The present procurement inspection supervisor and his manager are greatly responsible for the departments problem. Both emphasize and weigh heavy on the paperwork, not its people or the product they inspect. Although I

recognized the problem, and pleaded with management to let me oversee and correct the problem, they refused, and told me it wasn't my job. This is a violation of 10 CFR 50, **APPENDIX B. Under ORGANIZATION.** States in part " The quality assurance functions are those of (a) assuring that an appropriate quality assurance program is established and effectively executed and (b) **verifying, such as checking, auditing, and inspection, that activities affecting the safety related functions have been correctly performed.** The persons and organizations performing quality assurance functions shall have sufficient authority and organizational **freedom to identify quality problems;** to initiate, recommend, or provide solutions; and to verify implementation of solutions.

It should be noted, that the supervisor of the procurement inspection services, seldom supervise his people, but rely on their paperwork as the way to evaluate their work. he seldom left his office. I'm speaking about from 1989-1992 time period. He always check the inspectors paperwork, but never checked their parts. He always found errors with the paper, because he took the time to look. He refused to look at the product.