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April 28, 1983

822-1090

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In the Matter of  
Union Electric Company  
(Callaway Plant, Unit 1)  
Docket No. STN 50-483 OL

Administrative Judges Rosenthal, Edles and Gotchy:

This succeeds my letter of April 8, 1983, to the Atomic Safety and Licensing Appeal Board, which provided information on a potential reportable deficiency in connection with testing of candidates for Quality Control inspector certification at the Callaway Plant.

The enclosed report from Daniel Construction Company, constructor of the Callaway Plant, presents a chronology of relevant events, a discussion of the findings which resulted from the evaluation undertaken by Daniel and Union Electric Company, recites the corrective actions undertaken, and reaches final conclusions.

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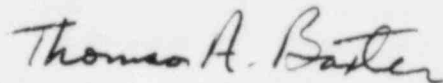
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A PARTNERSHIP OF PROFESSIONAL CORPORATIONS

Alan S. Rosenthal, Esquire  
Gary J. Edles, Esquire  
Dr. Reginald L. Gotchy  
April 28, 1983  
Page Two

On the basis of a preliminary report on the evaluation, on April 22, 1983, Union Electric informed NRC Region III that notice of the potential reportable deficiency pursuant to 10 C.F.R. § 50.55(e) was withdrawn. This concludes Applicant's provision of additional information.

Respectfully submitted,



Thomas A. Baxter  
Counsel for Applicant

TAB:jah

cc: per Certificate of Service

# DANIEL CONSTRUCTION COMPANY

CALLAWAY PLANT  
P. O. BOX 108  
FULTON, MISSOURI 65251  
314) 676-3111

April 27, 1983

The following capsulizes the events as they occurred on Stop Work 49 giving a chronology of the investigative actions taken by Daniel (DIC) pursuant to the reported potential problem; presents an evaluation of the findings and their impact; details the corrective actions taken; and presents the final conclusions of DIC Management.

## Chronology

March 22, 1983 - A potential problem was reported to Quality Management by a Quality Discipline Supervisor being cross trained in another discipline. The Supervisor reported that he had received a series of highlighted "One Time Issue" procedures from another Supervisor, which to him indicated a possible compromising of the testing program.

March 23, 1983 - The Supervisor gave the book of procedures to Quality Management. The responsible holder of the book and the involved Supervisors were questioned by Quality Inspector Management as to their relationship with the marked materials. A meeting of DIC Quality Management was held to discuss necessary corrective action measures. Stop Work Order #49 R/O was issued stopping all Quality training and certification activity. Union Electric Quality Assurance (UEQA) and DIC Project Management were notified of the Stop Work.

March 24, 1983 - All Quality Disciplines were required to collect all "One Time Issue" procedures and specifications, and all study materials that may have been pertinent to the certification exams. Stop Work #49, Rev. 1 was issued to allow the continuation of training, but retain the Stop Work on testing and certification.

March 25, 1983 - Quality Management commenced drafting preliminary objectives. As a backup measure to assure materials were turned in, Supervisory personnel searched trash disposal areas in the near vicinity of Quality offices for material which may have been discarded by employees. To assure objectivity, the Project Quality Manager (PQM) requested Corporate support to act as an independent monitor to the proposed objectives and action plan.

March 26, 1983 - A thorough evaluation of the collected materials was commenced to identify those possibly compromising the tests. This activity was overviewed by a DIC Quality Assurance representative.

March 28, 1983 - CAR 2-G-0031 was written as a further effort to identify the cause and proposed corrective action. PQM advised the Union Electric Nuclear Construction (UENC) of the situation. Quality Management informally discussed the proposed action plan with the UE Superintendent of Site QA. UEQA notified the U. S. Nuclear Regulatory Commission (USNRC) Resident Inspector of the potential problem.

(1 of 4)



March 29, 1983 - CAR 2-G-0031 was issued. Working groups consisting of a Quality Engineering (QE) and/or Quality Assurance (QA) representative and headed by a Quality Inspector (QI) Senior Supervisor, evaluated the suspect study materials to determine any existing correlation with certification tests. UEQA reported a Potential 50.55(e) to the NRC Region III.

March 30, 1983 - Quality Supervision and Corporate Level III Examiners reviewed the Non Destructive Examination (NDE) testing program; found no concerns in this area; and recommended the Stop Work be lifted for this area only. Corporate support representative arrived.

March 31, 1983 - DIC Management met with UE Management to discuss corrective actions being taken. UE concluded, as a result of the meeting, that there was not sufficient evidence of a problem to stop other work activities. The Project Quality Assurance Engineer informed UE of DIC's intent to lift the Stop Work on the area pertaining to NDE, and lifted the Stop Work on NDE testing and certification.

April 1, 1983 - DIC Quality Management developed an initial list of interviewees, comprised of all personnel identified to date who may have been in possession of questionable study materials and representative supervisors from each group identified (Primary Interview List). Interview questionnaire were established for the interview sessions.

April 4, 1983 - Nine (9) interview teams consisting of two (2) persons each were selected. A meeting was held to train the interviewers in the conduct and objectives of the interviews.

April 5, 1983 - Interviews commenced and the Primary interviews were completed, with the exception of the few personnel who were not on site this date. Primary List consisted of one hundred-four (104) interviewees.

April 6, 1983 - Last few Primary interviews completed. DIC Quality Management held a status meeting with UE Management.

April 7, 1983 - A Secondary Interview List was developed, consisting of a random sampling of Quality personnel (28) not previously interviewed or identified as being involved.

April 8, 1983 - Secondary interviews were conducted and completed. A Final Interview List was established which was comprised of thirteen (13) individuals who were either implicated by others during the Primary Interview, or who seemed to give apparent contradictory testimony during the Primary Interview. Final interviews were started.

April 11, 1983 - Final interviews were concluded.

April 13, 1983 - DIC Quality Management conducted briefing for UE Management. DIC indicated that the existing welding exams were being revised, gave their evaluation of findings, concluded that the Potential 50.55(e) be closed, and requested that the Stop Work be lifted. UE required a written report to close the Potential 50.55(e); and agreed to lifting the Stop Work, discipline by discipline, as revised tests were developed and presented.

#### Evaluation of Findings and Their Impact

As a result of the review of highlighted materials the following was found:

1. The majority of the highlighted materials retrieved from the field had been marked up subsequent to taking the procedural examinations, to be used as study guides by the individuals to prepare for the final written examination, and to indicate important things to remember for future field work. With the exception noted in item 3 below, there was no evidence that the study guides were provided to other individuals prior to their taking the procedural examination.
2. While the teaching techniques used by the trainers tended to be test material oriented, there was no evidence that training personnel compromised the tests.
3. The only highlighted procedures that had been circulated to individuals other than the holder of those procedures were those originally given to DIC Quality Management by the Supervisor. The only person, other than the holder of the procedures in question, who had realized the nature of the marked up procedures, was the Supervisor who had made them available to the Supervisor who had turned them in. The Supervisor that turned the procedures in did not realize what they were until he had taken several exams and he immediately stopped using the procedures as a study guide.
4. It was stated by an individual that approximately 6 years ago "practice tests" were commonly used in the Civil Physical Laboratory for study purposes. These tests were prepared by individuals for the purpose of preparing for procedural examinations, and were made up from old tests that were not used at that time. This is considered to be an appropriate practice.
5. One instance occurred approximately 3 years ago when a Lead Inspector observed a test in the possession of another Inspector. It was not known whether the test was a current one or an old one. Shortly after this was observed all study materials in the discipline (welding inspection) were collected and the tests revised.

#### Corrective Actions Taken

To address the concerns of Stop Work 49, and provide corrective action as a result of CAR 2-G-0031, the following actions are being taken based on the above evaluation:

1. The Stop Work on testing will be partially lifted as each inspection discipline's tests are revised. Union Electric is reviewing these revisions.
2. The Training Department is conducting an extensive evaluation of the Quality Testing and Certification Program.
  - a. On-Site training for trainers and supervisors on the conduct and responsibilities of training instructors has been completed.
  - b. Training has assigned one person to perform as Testing Coordinator.

- c. Major training and testing control procedures are presently under review by Corporate Training representative for incorporation within the near future.
3. All procedural exams will be condensed into comprehensive test banks of potential questions. The large question banks will allow a random selection of test questions from which each test will be constructed.
4. The Supervisor who provided the highlighted material to the Supervisor that turned it in to DIC Quality Management was reprimanded and will be retested when testing resumes.

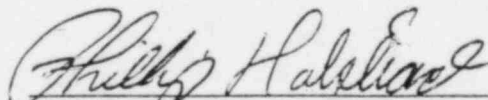
#### Final Conclusions

In comparison to the overall Certification program, the individual Procedural exams play a less significant role in Inspector certification than any of the required exams. A summary of the progression of the certification path is as follows: (A) Read and take exams relating to individual site Procedures, (B) Final Procedural Test - an exam covering several individual Procedures, (C) General Knowledge Test - an exam administered over common industry practices concerning job responsibilities, (D) Practical Exam - an exam approximately four (4) hours in duration that encompasses job responsibilities. Prior to taking this exam, the employee will have had overview by his Lead and a letter of recommendation prior to taking the exam. Items B, C, and D are significantly more in-depth and comprehensive than step A and preclude an employee from performing final work prior to being fully qualified.

These steps are of prime importance in the certification process and there have been no concerns demonstrated in these areas. With respect to the area in which the concerns were raised, the corrective actions outlined above are adequate to prevent any recurrence.

Based on our evaluation of the interviews and available highlighted materials, it has been determined by DIC Quality Management with Corporate concurrence that the site Quality Certification Program has not been compromised, thus eliminating any reinspection of hardware.

It is my opinion that the Potential 50.55(e) does not exist.

  
Phillip E. Halstead  
Project Quality Manager

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

In the Matter of )  
 )  
UNION ELECTRIC COMPANY ) Docket No. STN 50-483 OL  
 )  
(Callaway Plant, Unit 1) )

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing letter from counsel for Applicant to the Appeal Board dated April 28, 1983, with the attached Daniel Construction Company report dated April 27, 1983, were served this 28th day of April, 1983, by deposit in the U.S. mail, first class, postage prepaid, upon the following:

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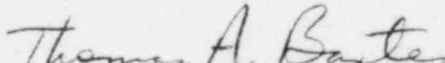
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