



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 1000  
ARLINGTON, TEXAS 76011

0 6 JAN 1984

MEMORANDUM FOR: Gordon Edison, NRR Allegation Coordinator

FROM: Thomas F. Westerman, Enforcement Officer, Region IV

SUBJECT: ADDITIONAL INFORMATION REGARDING PROPOSED BOARD  
NOTIFICATION FOR CPSES ATOMIC SAFETY LICENSING  
BOARD (ASLB)

The open hearing issue before the ASLB at Comanche Peak is Contention 5. Contention 5 is stated as follows:

"The applicants' failure to adhere to the quality assurance/quality control provisions required by the construction permits for Comanche Peak, Units 1 and 2, and the requirements of Appendix B of 10 CFR Part 50, and the construction practices employed, specifically in regard to concrete work, mortar blocks, steel, fracture toughness testing, expansion joints, placement of the reactor vessel for Unit 2, welding, inspection and testing, materials used, craft labor qualifications and working conditions (as they may affect QA/QC), and training and organization of QA/QC personnel, have raised substantial questions as to the adequacy of the construction of the facility. As a result, the Commission cannot make the findings required by 10 CFR Part 50.57(a) necessary for issuance of an operating license for Comanche Peak."

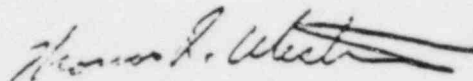
The ASLB has taken a very broad interpretation of this contention. The Citizen Association for Safe Energy (CASE) in their November 9, 1983, filing with the ASLB discusses the Lipinsky memorandum, as well as other coating related allegations. The subject of coatings is considered to be a licensing issue.

The safety significance of coatings relates to the potential for the loss of adhesion between successive coats that could result in paint material being carried into the containment sump as a result of a reactor accident which is followed by initiation of the containment spray system. The scenario of containment coating failure represents the potential to exceed the allowable blockage of the inner sump screen (reference NRC Regulatory Guide 1.82). There is also the possibility of paint interaction during the accident condition which does not appear to be in question at Comanche Peak.

I have attached the Lipinsky memo. If you need further information, then you may want to review the CASE November 9, 1983, filing with the ASLB.

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S PDR

In my previous memo of November 23, 1983, to S. A. Treby, ELD, the date for completion of the inspection should be changed to March 1984, and the inspection report issue date should be changed to April 1984.



Thomas F. Westerman  
Enforcement Officer

Enclosure:  
Memorandum to R. B. Roth

cc:  
J. T. Collins  
T. F. Westerman ✓

TO: R. B. Roth cc: J. J. Norris  
FROM: J. J. Lipinsky

SUBJECT: Trip Report OBC Job No. M8301 (Comanche Peak Unit 1-Glen Rose, TX)

The writer was on the subject site July 26, 27, and 28, 1983.

The following individuals were met while on site:

M. R. McGay (TUSI) Engineering Manager  
C. T. Brandt (EBASCO) Project Non-ASME QC Supervisor  
Gene Crane (TUSI) Construction Resident Manager  
Jerry Hoods (EBASCO) Personnel  
John Merritt (TUGCO) Manager of Start-Up  
T. L. Miller (EBASCO) Paint Inspector  
R. Tolson (TUGCO) QA Manager  
Mark wells (Gibbs & Hill) Engineer  
Harry Williams (Gibbs & Hill) QC Paint Supervisor

The following activities were performed while on site:

July 26, 1983 - Meet C. T. Brandt (Ebasco)  
- walk site with Harry Williams (Gibbs & Hill)  
- Meet R. Posgay (OBC) - discuss painter qualifications and site conditions/problems in general  
- Meet Mark wells (Gibbs and Hill)  
- Get Badged

July 27, 1983 - walk around site - observe work on polar crane and dome  
- Brief meeting with R. Tolson (TUGCO) and C. T. Brandt (Ebasco) - preliminary assessment by J.J.L. that Comanche Peak has problems in areas of material storage, workmanship (quality of work and painter qualification & indoctrination), not satisfying ANSI requirements and possibly coating integrity. All of above could affect NRC licensing to which R. Tolson replied "That's not my job or concern".

Also discussed former OBC employees with emphasis on T. L. Miller (Ebasco). R. Tolson (TUGCO) asked JJJ if JJJ would rehire T. L. Miller (Ebasco). JJJ replied "Depending on circumstances, yes". C. T. Brandt (Ebasco) volunteered to have T. L. Miller (Ebasco) at the airport by three o'clock.

- July 27, 1983
- Go through project specifications
  - Meet with swing shift inspection personnel
  - Observe swing shift work on polar crane and dome
- July 28, 1983
- Meet JJN and give run down on observations and potential problem areas
  - Meet with Mark Wells (Gibbs and Hill) and go over specification 2323AS31 and FSAR commitments to ANSI Standards. ANSI N5.12, 101.2, 101.4 (which ties into N5.2) and Regulatory Guide 1.5A are referenced in either the specification or FSAR.
- Advise JJN on specification/FSAR commitments
- Meeting with J. Merritt (TUGCO), G. Crane (TUSI)  
R. Tolson (TUGCO), M. McBay (TUSI), JJN, JJJ
- A) JJN gave introduction which included the fact that the Comanche Peak site is committed to ANSI requirements and JJN then attempted to turn over discussion to JJJ.
- B) JJJ started by stating that based on observations and specification/ANSI commitments that there are areas for people to be concerned about at Comanche Peak.
- JJJ briefly reviewed for the individuals present that OBC has had extensive experience on nuclear projects, and that OBC is familiar with various means/methods of satisfying ANSI requirements.
- R. Tolson (TUGCO) asked for examples of specific problem areas or items.
- JJJ replied that specifics cannot be given without a thorough review/audit. However, described problems with material storage, painter qualification/instruction, possible documentation deficiencies, and morale problems.
- C) JJJ indicated that by Brown and Root estimates, only 34 out of 452 individuals are of any value as painters. JJJ also stated that if quality work is put in place then they would be a long way to resolving site problems. Further JJJ stated that there is currently a "No Win" situation on site between the craft and QC Inspectors, and even though this sounds corny, Brown and Root needs to develop a "Win-Win" situation.

Conversation at this point took off on the areas of assuring that individuals putting work in place are doing an adequate job or get disciplined, and changing morale.

- D) Discussion then centered on what if any changes OBC would recommend for the specification. Essentially Brown & Root is happy with the level of enforcement/inspection currently in force for the specification/procedure requirements. Also a change in the specification this late in the game would only confuse matters on site. JJN to come up with a DCA for touch-up.
- E) Problems with the quality of the air supply (takes up to half of the shift to have the oil problem corrected) were discussed and how to correct same.
- F) Availability and qualification of inspection personnel was discussed. JJN suggested that J. Coogan (BEI) may have some people available. J. Merritt (TUGCO) suggested J. Coogan contact Jerry Hoops (Ebasco).

-Meeting with J. Church (TUGCO-VP) J. Merritt (TUGCO)  
JJN, JJL

- A) J. Merritt (TUGCO) reviewed/summarized discussion of earlier meeting.
- B) J. Merritt (TUGCO) directed JJN/OBC to do no more (other than recommend alternative air supply) until notified by TUGCO.

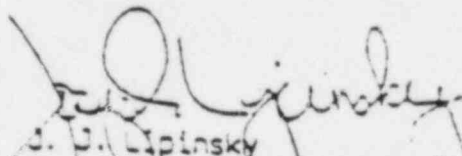
The following are the writers observations/opinions as a result of this site visit:

- A) To some extent a parallel can be drawn with Comanche Peak and Zimmer. Comanche Peak is doing inspections to the degree that they (Comanche Peak) are comfortable with or will tolerate. However in the real world there are requirements that have to be satisfied, and in at least the areas of material storage, painter qualification/indoctrination, documentation and traceability indications are that Comanche Peak falls short in adequately satisfying these requirements. The writer's opinion is that management at Comanche Peak has deluded itself into thinking everything is alright or it will all come out in the wash. The fact that management attempts to squash any efforts to point out quality problems (No NCR's, QC reporting to production, etc.) to some extent confirms the above, and has led to a morale problem with the inspection staff.

- B) Almost everyone in the inspection staff is looking to get out of Comanche Peak. The inspection staff works 60-70 hours a week. You can't work people on an extended basis even with high salaries (apparently only a few stay a whole year). In addition to the long hours the inspectors contacted by the writer (other disciplines included) all have a low opinion of the quality of the work put in place, and in effect are keeping quiet until they can find another job.
- C) The writer did not feel comfortable with the way JLN presented the ANSI requirements. This has been discussed with JLN, and to a certain extent the writer feels that at the least the manner of presentation was counter productive to Cannon's efforts. The writer would like to state for the record that OBC does satisfy all applicable ANSI requirements and has done so on numerous nuclear projects.
- D) JLN and JNL discussed the possibility of OBC performing an in-depth audit. The writer cannot recommend an audit at this time because B&R is hostile to the idea and no action would be taken by B&R on problems/concerns detected during the audit.
- E) High DFT of CZ#11 is power ground to acceptable DFT. This would burnish or polish the zinc, and possibly result in poor adhesion of the top coat.
- F) Old Phenoline 305 (between 1-2 years old) is being topcoated with new Phenoline 305 with little or no surface preparation (solvent wipe).

SUMMARY:

- 1) This trip was not as productive as the writer had hoped. Often the writer felt that B&R wanted to buy the "right" answer. This is substantiated to some extent by the fact that they did not try to utilize the expertise and/or experience of the writer with regard to Quality Assurance/Quality Control, and the attitude of the B&R management (especially Quality Assurance).
- 2) If OBC tries to obtain a contract on this site, the writer would suggest that it be a rework contract because it will be impossible (by all indications) to salvage what work is currently in place.

  
J. J. Lipinsky  
Quality Assurance Director