

*Good*

February 23, 1983

MEMORANDUM FOR: George E. Johnson, Attorney, Office of the Executive  
Legal Director

FROM: Carl E. Alderson, Director, Program Support Staff

SUBJECT: DOCUMENTATION OF ALLEGATIONS: DUKE POWER COMPANY,  
CATAWBA NUCLEAR STATION

As you requested in our telephone communication on February 14, 1983, I have enclosed the case chronology related to allegations made to the NRC regarding welding issues at the Duke Power Company's Catawba Nuclear Station.

Please note that while many Q. C. Inspectors referred their concerns to Duke Power Company only four of these individuals made allegations directly to the NRC. The identity of these four individuals as contained on pages within this enclosure has been notated by a distinct "Confidential Source" stamp. The identity of these individuals, their statements, and copies of documents they provided to the NRC should be maintained confidential and should not be released according to NRC guidelines.

If I can be of any further assistance in this matter please contact me at FTS 242-5505.

(original signed J. M. Puckett for)

Carl E. Alderson

Enclosure:  
Duke Power Company Catawba Case  
Chronology Case No.: RII 2G022

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February 28, 1983

MEMO TO FILE

Subject: Catawba Welding Inspector Concerns, Completion of

In late 1981 Quality Assurance (QA) management became aware of dissatisfaction among the Catawba Welding Inspectors. Although this dissatisfaction was expressed as lack of support by QA Supervision, it was also evident that a number of inspectors were concerned over previous decisions and interpretations made by QA management.

Subsequently, in early 1982 a Welding Inspector Task Force consisting of experienced engineers from each of the affected departments was appointed to investigate the concerns of the welding inspectors. A consultant (Management Analysis Corporation) was also retained by W H Owen, Executive Vice President/Engineering & Construction, to conduct an independent overview of the work of the Task Force. During their investigation the Task Force interviewed each welding inspector and received both verbal information and documents (diaries) maintained by the inspectors. Each concern was evaluated by a single engineer and then separately evaluated by a second engineer to determine if technically inadequate installations had occurred. Although the Task Force did not identify any technical inadequacies it was apparent that past violations of procedures; misinterpretations of procedures and poor communications had occasionally occurred.

The Task Force efforts were compiled into a report which listed their recommendations in three categories, i.e. specific, general and programmatic. Subsequent to the issue of the Task Force report each concerned inspector was separately contacted by a member(s) of the Task Force and informed of the findings of the Task Force.

Quality Assurance Management reacted to the Task Force report by developing a Management Implementation Plan to assure that each specific recommendation was reviewed for action. Further, each general and programmatic recommendation was reviewed to determine the relationship of specific concern to broader needs. This review pointed out the need for certain policy, procedure and programmatic changes. These changes were implemented during 1982 and all changes were incorporated into the quality assurance program. Information about these changes has been provided to the inspectors in various ways.

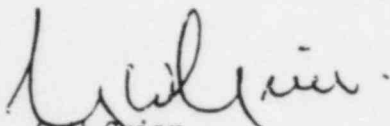
Additionally each concerned welding inspector and welding inspector supervisor was interviewed by the Catawba NRC Resident Inspector to discuss specific concerns and the adequacy of the corrective actions implemented. Although a few individuals indicated they felt the Task Force effort had not completely answered some of their concerns none expressed knowledge of any

Page 2  
MEMO TO FILE/GWG  
2/28/83

technically inadequate installations.

At this time Quality Assurance Management plans no further specific action on the Task Force Report as all specific, general and programmatic recommendations have been acted upon. However, certain continuing programs implemented by the Quality Assurance Department (e.g. Employee Forum, Employee Recourse, Quality Circles and increased management visibility) should prevent future problems of this type.

Documentation of Task Force activities, corrective action implemented and implementing correspondence are on file in the Corporate Quality Assurance offices.

  
G W Grier  
Corporate QA Manager

GWG/ph

cc: W H Owen  
W H Bradley  
A V Carr  
CNS NRC Resident Inspector

*Presented to ACRS subcommittee in Charlotte, NC on*

IE PRESENTATION TO ACRS ON MARCH 4, 1983

*March 4, 1982*

*JMB*

I AM JACK BRYANT, SENIOR RESIDENT INSPECTOR AT THE OCONEE SITE. PRIOR TO MY CURRENT ASSIGNMENT I WAS A SECTION CHIEF IN THE REGION II OFFICE FROM NOVEMBER 1972 TO JANUARY 1983. FOR ABOUT FOUR YEARS OF THAT PERIOD I SUPERVISED REGION II CONSTRUCTION SPECIALIST INSPECTORS. THE REMAINING EIGHT YEARS I WAS CONSTRUCTION PROJECT SECTION CHIEF; THUS, INSPECTION OF CONSTRUCTION AT CATAWBA FOR NRC HAS BEEN ASSIGNED TO ME IN ONE OF THOSE CAPACITIES SINCE PRIOR TO ISSUANCE OF THE CONSTRUCTION PERMIT.

REGION II PERSONNEL HAVE PERFORMED 166 INSPECTIONS OF CATAWBA, AND A CONSTRUCTION INSPECTOR HAS BEEN IN RESIDENCE SINCE FEBRUARY OF 1980. EIGHTY-EIGHT VIOLATIONS WERE IDENTIFIED DURING THOSE INSPECTIONS, 37 OF THEM WERE OF THE LOWEST SEVERITY LEVEL. THE INSPECTIONS WERE OF QUALITY ASSURANCE AND OF THE TECHNICAL ASPECTS OF CONSTRUCTION WORK.

TWO SPECIAL TEAM INSPECTIONS WERE CONDUCTED AT CATAWBA, ONE IN NOVEMBER 1979 AND ONE IN JANUARY 1981. DURING THE 1979 INSPECTION, PRIVATE INTERVIEWS WERE HELD WITH 57 INDIVIDUALS, PRIMARILY CRAFTSMEN, QC INSPECTORS, AND CRAFT FOREMEN. THEY WERE ASKED AT THE INTERVIEWS IF THEY HAD ANY OUTSTANDING CONCERNS ABOUT THE QUALITY OF CONSTRUCTION: IF THEY WERE AWARE OF ANY INSTANCES WHERE CONSTRUCTION DID NOT MEET PRESCRIBED SPECIFICATIONS, CODES, STANDARDS OR OTHER REQUIREMENTS AND WHERE CORRECTIVE ACTION WAS NOT TAKEN; AND IF THEY WERE AWARE OF ANY DAY TO DAY PROBLEMS OR IRREGULARITIES AFFECTING QUALITY OF WHICH THEY BELIEVED NRC SHOULD BE INFORMED.

SEVERAL OF THOSE INTERVIEWED MENTIONED OCCASIONS WHERE EXTRA WORK WAS REQUIRED TO REPAIR POOR WORK CAUSED BY HASTE OR IMPROPER PLANNING. NONE PROFESSED KNOWLEDGE OF ANY POOR WORK WHICH HAD NOT BEEN FOUND BY QC AND SUBSEQUENTLY CORRECTED.

A TRIAL CONSTRUCTION TEAM INSPECTION WAS CONDUCTED AT CATAWBA ON JANUARY 26-FEBRUARY 6, 1981. ONE GOAL OF THAT INSPECTION WAS TO DETERMINE MANAGEMENT INVOLVEMENT IN SITE PROBLEMS. ALSO, AN INTEGRAL PART OF THAT INSPECTION WAS TO DETERMINE BY OBSERVATION AND CONVERSATION THE QUALIFICATIONS OF CRAFTSMEN AND QC PERSONNEL AND TO QUESTION THESE PEOPLE CONCERNING THE AVAILABILITY OF ASSISTANCE WHEN NEEDED, RELATIONSHIP BETWEEN WORK GROUPS, ANY INDICATION OF HARASSMENT OF INSPECTORS OR WORKERS, AND WORKER RECOURSE IF THEY WERE HARASSED OR SAW POOR WORKMANSHIP.

THE INSPECTORS CONCLUDED FROM INTERVIEWS, OBSERVATION, AND REVIEW OF SITE AND COMPANY POLICIES, THAT MANAGEMENT AND SUPERVISION WERE AVAILABLE TO EMPLOYEES AT A VERY LOW THRESHOLD. NO ONE QUESTIONED ACKNOWLEDGED HARASSMENT OF ANYONE. THE INSPECTORS DECIDED IT UNLIKELY THAT HARASSMENT DETRIMENTAL TO QUALITY WORK COULD DEVELOP UNDER THE CONDITIONS OBSERVED.

THE TEAM INSPECTION RESULTED IN SEVERAL VIOLATIONS. ONE OF THESE CONCERNED INADEQUATE DESCRIPTIONS OF CONSTRUCTION DEFICIENCIES (CDE'S) FOUND BY THE LICENSEE AND OF THE CORRECTIVE ACTION TAKEN. THOSE CDR'S INSPECTED IN DETAIL REVEALED IN EVERY CASE THAT APPROPRIATE CORRECTIVE ACTION HAD BEEN TAKEN ON THE HARDWARE PROBLEM, BUT THAT COULD NOT BE DETERMINED FROM THE RECORD.

AS A RESULT OF THAT FINDING, THE LICENSEE REVIEWED THE 11,000 CDR'S WRITTEN UP TO THAT TIME TO VERIFY THAT EACH HAD BEEN PROPERLY HANDLED. QA AND QC PROCEDURES WERE REWRITTEN TO BETTER CONTROL THE HANDLING OF CDR'S. CORRECTIVE ACTIONS WERE TAKEN AND WERE CLOSELY FOLLOWED BY THE SENIOR INSPECTOR UNTIL HE WAS ASSURED THAT CORRECTIVE ACTIONS WERE EFFECTIVE.

THE TEAM INSPECTION REVEALED OTHER APPARENT WEAKNESSES IN COMMUNICATION WITHIN THE LICENSEE ORGANIZATION. IN THE LATTER PART OF 1981 AND IN 1982 DUKE CORPORATE MANAGEMENT APPEARED TO HAVE CONSIDERABLY MORE INVOLVEMENT IN SITE ACTIVITIES. THIS PROBABLY HAD CONSIDERABLE INFLUENCE ON THE REDUCTION OF VIOLATIONS PER INSPECTION FROM AN AVERAGE OF ONE PER INSPECTION IN 1980 AND 1981 TO ABOUT ONE PER THREE INSPECTIONS IN 1982.

ALLEGATIONS HAVE BEEN MADE CONCERNING CATAWBA ON SEVERAL OCCASIONS. IN 1978 ALLEGATIONS WERE MADE CONCERNING PIPING DESIGN. THESE ALLIGATIONS WERE INVESTIGATED AND SAFETY IMPLICATIONS WERE NOT SUBSTANTIATED.

IN OCTOBER 1979 A FORMER EMPLOYEE MADE ALLEGATIONS TO THE LOCAL MEDIA CONCERNING IMPROPER CONSTRUCTION PRACTICES AT CATAWBA. THIS ALLEGER HAS REFUSED TO DISCUSS HIS ALLEGATIONS WITH NRC. REGION II HAS CONDUCTED INSPECTIONS IN THE AREAS OF HIS ALLEGATIONS AND HAS NO OUTSTANDING PROBLEMS.

IN 1980 A SITE EMPLOYEE MADE ALLEGATIONS TO THE SENIOR RESIDENT INSPECTOR CONCERNING IMPROPER CONSTRUCTION. HIS ALLEGATIONS WERE INVESTIGATED AND NO SAFETY CONCERNS WERE IDENTIFIED. THE EMPLOYEE SUBSEQUENTLY MADE HIS ALLEGATIONS TO THE MEDIA.



IN 1981 ALLEGATIONS WERE RECEIVED CONCERNING SEISMIC RESTRAINT DESIGN. THESE ALLEGATIONS ARE BEING PURSUED BY REGION II.

IN JANUARY OF 1982, DUKE POWER COMPANY INFORMED REGION II THAT IT HAD RECEIVED A NUMBER OF ALLEGATIONS FROM QC PERSONNEL. DUKE WAS ORGANIZING A TEAM OF OFF SITE PERSONNEL, INCLUDING A CONSULTANT, TO INVESTIGATE THE ALLEGATIONS, AND ASKED REGION II TO PERMIT DUKE TO MAKE ITS OWN INVESTIGATION PRIOR TO NRC INVOLVEMENT. IN MAY 1982 DUKE MADE A PRESENTATION AT REGION II OF ITS PROGRESS. REGION II AGREED TO DUKE'S PROPOSAL WITH AGREEMENT FROM DUKE THAT THE SENIOR RESIDENT INSPECTOR WOULD BE KEPT FULLY INFORMED AND WOULD HAVE ACCESS TO THE TEAM'S FINDINGS AT ANY TIME.

MEANWHILE, SOME OF THE ALLEGERS ALSO PRESENTED THEIR ALLEGATIONS TO THE SENIOR RESIDENT INSPECTOR. THE SRI VERIFIED THAT DUKE HAD ALSO RECEIVED THESE COMPLAINTS, WHICH INCLUDED MOST OF THE TOTAL OF 129 ALLEGATIONS OF POOR WORKMANSHIP, HARASSMENT, SUPPRESSION, AND FALSIFICATION OF RECORDS RECEIVED BY DUKE. THE SRI KEPT ABREAST OF DUKE FINDINGS, DISCUSSED WITH THE ALLEGERS THEIR PERCEPTION OF THE DUKE INVESTIGATION, AND EXAMINED MUCH OF THE HARDWARE ALLEGED TO BE IMPROPERLY CONSTRUCTED. THE SRI HAS CONCLUDED THAT THE LICENSEE TASK FORCE REVIEW WAS COMPLETED, APPROPRIATE CORRECTIVE ACTIONS WERE TAKEN, APPROPRIATE RECORDS WERE KEPT, AND DUKE ATTEMPTED TO REACH AN UNDERSTANDING WITH EACH ALLEGER. A NUMBER OF PROCEDURE VIOLATIONS WERE IDENTIFIED BY DUKE BUT NO SERIOUS HARDWARE DEFICIENCIES WERE FOUND AND NO FALSIFICATION WAS IDENTIFIED.

IN 1982 THE LICENSEE CONDUCTED AN AUDIT OF CATAWBA AND McGUIRE DESIGN, PARTICULARLY OF DESIGN INTERFACES. THOUGH WEAKNESSES WERE FOUND WHICH

CAUSED DUKE TO MAKE SEVERAL CHANGES IN PROCEDURES, THEY FOUND NOTHING WHICH NECESSITATED A HARDWARE CHANGE. ALSO IN 1982, DUKE PERFORMED A SELF INITIATED AUDIT, IN CONJUNCTION WITH TVA, OF DESIGN AND CONSTRUCTION. FINDINGS ARE CURRENTLY BEING REVIEWED BY REGION II.

IT IS THE REGION II OPINION THAT DUKE POWER COMPANY HAS A WELL DEFINED AND IMPLEMENTED QA PROGRAM. ITS CORPORATE MANAGEMENT HAS A GREAT DEAL OF PARTICIPATION IN SITE ACTIVITIES AND PROBLEMS. DUKE IS A LARGE ORGANIZATION WITH CONSIDERABLE DEPTH AND IS ITS OWN ARCHITECT/ENGINEER AND CONSTRUCTOR. AS STATED IN THE 1982 SALP REPORT, DUKE'S MAJOR STRENGTH APPEARS TO BE A CONSIDERABLE DEDICATION, AT ALL LEVELS, TOWARD PRODUCING QUALITY WORK. WE BELIEVE THAT CATAWBA IS A WELL CONSTRUCTED SITE.



*Yellow*

DUKE POWER COMPANY  
P.O. BOX 33188  
CHARLOTTE, N.C. 28242

HAL B. TUCKER  
VICE PRESIDENT  
NUCLEAR PRODUCTION

TELEPHONE  
(704) 373-4531

March 14, 1983

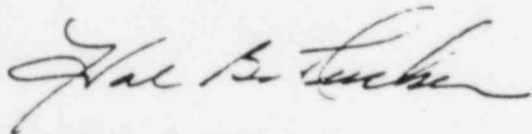
Mr. James P. O'Reilly, Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30303

Re: RII:PKV / A  
50-413/82-33  
50-414/82-31

Dear Mr. O'Reilly:

Duke Power Company does not consider any information contained in the subject  
IE Inspection Report to be proprietary.

Very truly yours,



Hal B. Tucker

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