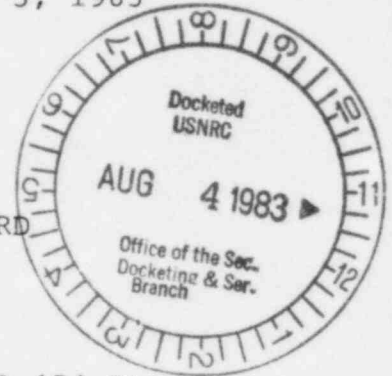


UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In The Matter of )  
COMMONWEALTH EDISON COMPANY ) Docket Nos. 50-454 OL  
(Byron Nuclear Power Station, ) 50-455 OL  
Units 1 & 2) )

SUMMARY OF DIRECT TESTIMONY OF  
MICHAEL A. STANISH

- I. Michael A. Stanish is the Quality Assurance Superintendent at Byron Station. He previously testified before the Board on March 29 and 30, 1983.
- II. Mr. Stanish is familiar with the results of the Region III special team inspection with regard to the training and certification of QA/QC personnel.
- III. In response to the special team report Commonwealth Edison developed specific certification standards to be met by each site contractor.
- IV. To ensure that contractor QA/QC personnel were certified to the revised standards Edison required site contractors to retrain and recertify as necessary those inspectors who did not meet the revised standards.
- V. To assure that the revised certification standards are being met by site contractors Edison's Byron Quality Assurance Department reviews 100% of contractor inspector certification packages.
- VI. A reinspection program has been implemented by Edison to review the work performed by inspectors prior to the 1982 special team inspection.
- VII. Commonwealth Edison Quality Assurance has audited the reinspection program and has concluded that with a few exceptions the program is being implemented adequately.

DIRECT TESTIMONY OF MICHAEL A. STANISH

Q.1. Please state your name.

A.1. Michael A. Stanish.

Q.2. Did you testify in these proceedings on an earlier date?

A.2. Yes. I appeared before the Board on March 29 and 30, 1983.

Q.3. What is the scope of your testimony here?

A.3. My testimony describes the recertification of quality assurance-quality control inspectors subsequent to the special team inspection conducted by the NRC's Region III Office of Inspection and Enforcement in March, April and May, 1982.

Q.4. What is your present position with Commonwealth Edison Company?

A.4. I am the Quality Assurance Superintendent at Byron Station.

Q.5. What are your responsibilities as the Quality Assurance Superintendent?

A.5. I am responsible for the direction of all Commonwealth Edison Company quality assurance activities at the Byron construction site. Included among my responsibilities are direction of Commonwealth Edison's audit and surveillance program as well as review of the audit and surveillance programs of site contractors to assure that quality assurance requirements are met. I am also responsible for direction of the independent testing agency on site, which conducts various inspections of site contractor installation activities. It is my responsibility to assure that corrective action is achieved for any quality related problems identified through audits surveillances, nonconformance reports, etc., in an acceptable and timely manner. I direct three supervisors, who in turn supervise approximately 30 people.

Q.6. Are you familiar with the results of the Region III special team inspection with regard to the training and certification of QA/QC personnel?

A.6. Yes, I am. As Walter Shewski discussed in some detail in his direct testimony at pages 31-33, the Region III staff felt that Commonwealth Edison should apply standardized inspector certification requirements, based on ANSI Standard N45.2.6-1978,

to all contractors at Byron. Prior to the special team inspection, uniform criteria had not been established for qualifications of inspectors of various contractors. Instead, Commonwealth Edison reviewed the certification program of each contractor to ensure that the program met the intent of N45.2.6-1978 and provided for an effective inspection function. The Region III Staff, however, desired that Commonwealth Edison utilize a standardized interpretation of N45.2.6-1978 for all Byron contractors. The Staff's conclusions were delineated in their reports 50-454/82-05 and 50-455/82-04.

Q.7. What actions did Commonwealth Edison take in response to the findings of the Region III special team inspection?

A.7. The ANSI standard for certification of QA/QC personnel, N45.2.6-1978, establishes recommended guidelines for the qualifications of such personnel. However, the ANSI standards provide only general guidelines, establishing few specific certification requirements.

Commonwealth Edison reviewed the parameters set forth in N45.2.6-1978, and translated the general guidelines of the ANSI standard into specific standards to be met by each contractor.

For example, Edison quantified the general ANSI requirement of on-the-job training into a requirement of a minimum number of hours for each inspector.

The standards developed by Commonwealth Edison then were transmitted to the site contractors, who were required to revise their training and certification procedures to incorporate the new standards. The revised procedures of each contractor subsequently were submitted to the Commonwealth Edison Quality Assurance Department at Byron for approval.

Q.8. What steps did Commonwealth Edison take to ensure that the QA/QC personnel employed by the contractors were certified to the revised standards?

A.8. Each of the site contractors was directed to review all QA/QC personnel presently employed to verify that each inspector met the revised standards. Inspectors who did not satisfy the revised standards were required to be retrained and recertified as necessary by the employing contractors.

In order to assure that the latest standards for the training and certification of QA/QC personnel are being met by site contractors, Commonwealth Edison's Quality Assurance Department reviews 100%

of the contractor inspector certification packages. This review confirms that all certification requirements have been met and that the certification process has been fully and appropriately documented.

Q.9. Has Commonwealth Edison taken any steps to examine the work performed by inspectors prior to development of the current certification standards?

A.9. Yes. A reinspection program has been implemented to review the work performed by the inspectors of various contractors prior to the 1982 special team inspection. This reinspection program is discussed in the testimony of Richard Tuetken.

Q.10. Has this reinspection program been reviewed by Commonwealth Edison Quality Assurance?

A.10. Yes. Commonwealth Edison Quality Assurance has completed an audit of the reinspection program, dated July 18, 1983, and has concluded that with a few exceptions the program is being implemented adequately. The items identified involve for the most part clarification of specific aspects of the reinspection program, and do not involve the quality of the work. The responsible contractors

have been directed to respond to the items identified by August 5, 1983. Commonwealth Edison Quality Assurance will follow up on areas items to ensure that all items are appropriately closed.