

October 23, 1980

Docket No. 50-498
50-499

MEMORANDUM FOR: K. V. Seyfrit, Director

THRU: W. C. Seidle, Chief, RC&ES Branch
W. A. Crossman, Chief, Projects Section

FROM: H. S. Phillips, RRI - South Texas Project

SUBJECT: SHOW CAUSE ORDER FOLLOW-UP INSPECTION AND RESUMPTION
OF SAFETY-RELATED WORK ACTIVITY AT SOUTH TEXAS PROJECT

I recommend the following relative to closing open items and allowing the restart of the subject activities:

Recommendation No. 1

That RIV task force follow up inspection on all noncompliances, unresolved items and open allegations identified in Investigation Report No. 50-498/79-19; 50-499/79-19 be substantially complete so that all items are closed or only lack minor actions to close.

Status

Nonconformances have been inspected and closed except for Appendix A Items A-2, A-11 and A-20. Mr. Tapia advised that A-2 and A-20 only lack the review of the final report/evaluation. Mr. Tomlinson has completed all follow up on A-11 except for verification of implementation of corrective action.

Only ten unresolved items remain open and most of these may be closed within the next two-three weeks.

One of seven open allegations was closed. The task force tried to follow up on two other allegations; however, the alleged defective welding was inaccessible. The remaining allegations do not appear to be defects that would cause system problems.

Conclusion

Generic issues and noncompliances have been reviewed and corrective action was verified. Such items have been closed except for A-11. Limited work to demonstrate that corrective action is adequate should be allowed on a step by step basis and this work should be observed by RIV task force members. If corrective action is effectively, the work can be expanded as

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Recommendation No. 2

That RIV task force follow up inspection on Show Cause Order responses and commitments be substantially complete before ASME welding and complex concrete placement activities are restarted. Substantially complete means objective evidence of corrective action or implementation of commitments for Show Cause Order Items VA(1) - (9) has been reviewed and was deemed satisfactory.

Status

Responses to Show Cause Order Items VA(1), VA(4), VA(5), VA(6) and VA(9) have received such review. Item VA(7) is in progress. Items VA(4) and VA(5) should be closed. Mr. Hubacek commenced his review of implementation of Item VA(8) on approximately October 21, 1980. Mr. Tapia should commence his review of Items VA(2) and VA(3). The task force review of the response to all items should be completed by October 24, 1980.

Conclusions

Show Cause Order Item VA(1) was reviewed and it was determined that B&R QA implementing procedures ST-QAP-1.1 and 10.1 had not been established. These procedures should be in place before further work begins since they describe the new on-site B&R QA Project function. A number of other QA procedures, not as critical, are being established.

ASME welding procedures were still in the review process as late as October 18, 1980. The licensee projects that these procedures will be completed before October 28, 1980, the date proposed for resumption of complex concrete placement. This date appears to be realistic.

Recommendation No. 3

That RIV task force verify that the licensee's commitments relative to staffing the restructured organizations be complete and functional procedures for all organizations be established. That the task force verify that other commitments, such as those listed in the Appendices of HL&P correspondence, dated September 18, 1980, have been implemented prior to the licensee's performing production work on an unlimited basis.

Status

The task force has not been able to verify full staffing since the licensee and the contractor committed to achieve such staffing by January 1, 1981. The licensee is experiencing difficulty in recruiting. It appears that such staffing commitments can only be achieved through the use of temporary employees secured through man power agencies or consultants.

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Conclusion

HL&P and B&R are currently conducting a strong recruiting effort for permanent employees but have experienced losses as a result of employee resignations. Staffing commitments can probably be achieved by January 1, 1981, by adding temporary employees. The licensee seems to be leaning in this direction.

The RIV task force should complete their review of all commitments by approximately November 21, 1980, which should allow the task force to recommend full resumption of safety-related work.

Recommendation No. 4

That RIV verify that corrective action relative to Show Cause Order Items VA(1), VA(3), VA(6), VA(7), VA(8) and VA(9) is adequate by observing that the QA organizational and system changes, procedures, etc., are adequately implemented during the six month period of time after unlimited construction work begins. These items would be closed at the end of this period if all systems are properly working to control the project. Corrective action can and should be verified during routine "B" and "C" inspections.

(S)

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