

NUCLEAR REGULATORY COMMISSION

REGION II 101 MARIETTA ST., N.W., SUITE 3100 ATLANTA, GEORGIA 30303 MAR 1 6 1981

> \$\$IN\$ 50-400, 50-401 50-402, 50-403

MEMORANDUM FOR: C. Alderson, Director, Enforcement and Investigation, RII

THRU: Mc. E. Murphy, Chief, Engineering Inspection Branch, RII

A. R. Herdt, Section Chief, Engineering Inspection Branch, RII

FROM:

N. Economos, Reactor Inspector, MPS, Engineering Inspection

Branch, RII

SUBJECT:

ALLEGATIONS - ACTIVITIES OF QA PERSONNEL AT SHEARON HARRIS NUCLEAR PLANT (DOCKET NOS. 50-400, 50-401, 50-402 and 50-403)

During a routine inspection of the Shearon Harris Nuclear Plant conducted between February 18-20, 1981, two of three individuals interviewed reiterated certain allegations which they had made to the NRC resident inspector earlier. A description of these allegations were as follows:

Individual "A" alleged that:

- a. Individuals without previous experience in hanger inspections are given a short how-to course in this area; upon successful completion of the course they are given a 90-day temporary qualification and assigned to the hanger inspection crew. The alleger questions the competancy of these individuals and the adequacy of their work.
- b. Certain welding inspector candidates were given copies of proficiency examinations for home study and then allowed to take the examination until a passing grade was attained.
- c. The site QA Director rewrites (sanitizes) all deficiency disposition reports (DDRs) generated by field QA personnel before approving them for further action.
- d. The site QA Director discusses with Construction Inspection (CI)
 Supervisor problems identified by field QA personnel and in many cases corrective action is taken without generating NCRs or DDRs as required by site procedures.
- e. QA personnel are demoralized because the QA Director does not support them in disputes with engineering and/or management.

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Individual "B" alleged that:

- a. The QA Director has ordered him to confine his activity to areas within his discipline only. That is if during the inspection of an electrical pull box or a cable tray, he identifies a welding and/or a mechanical problem and finds that the electrical aspects are acceptable, he is to restrict his comments to the electrical aspects only and make no comments on the other problems.
- b. Repeated items 1.d and 1.e above.
- The QA Director has instructed him not to issue NCRs for QC inspection reports found to contain discrepancies. Instead he was instructed to bring the problem to the attention of the responsible party and have it corrected. The following is an example used to support his point: Form No. TP-09 Concrete Embedded Electrical Equipment Inspection Form, Pour No. 1-ACSL-305-005 1/14/81 and 1-ACSL-305-007 2/4/81.

Finally after meeting with the inspector in the NRC trailer, which is in full view of the site manager's and the resident engineer's offices, the alleger stated that he was summoned to the QA Director's office where he was instructed, by the QA Director not to talk to NRC unless he cleared it first with him or unless the NRC inspector asked him a question. In this case the alleger stated that he was instructed to answer in short and to the point. The alleger stated that the QA Director informed him that unless he follows these instructions he would be in trouble.

In N. Economos

Contact: N. Economos (Ext. 4667)

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E' SEN, NC \$ 5ANUARY 12. 1982

I, Panes W. Kilgore make the following free and Voluntary statement to me. J. T. Vorse who has I dentitied himself to me as AN investigator with the U.S. Naclear Regulatory Commission. No threats or gramises have been working as such at Sherrow Harris since September 1980 to the present time. I an employed by Daniel's Construction Officed on, he about 20 times, about I have on the averge each, I assistelle in locating webs and he would isspect they. Most of these welds were in wiste process butding I would say nost of the welds were casily accessible. On September 9, 1981 L Jooked at some welds off the MY afon ind colone 2, East West lallary in the Waste Processing Building. He did not suspect them because they were locatelabout 20 feet above us and there are as wy to get to them, L singly Allalost the stickers, inteled then and handed both of then to me and the told me to get then on. I told him I awid, but I didn't I later pit one of them on my love hox and Sign the welding inspected short. He headed me the

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Carbon copy. This was turned over to the horance.
Those wore the only two welds I sin him hat lost at.

I always seems like he is in a horry. Those inspections were all on now safety related welds, all class To.

I have read the above Shotement consisting of 2 pages which were contended for Usase at my request. I have made accessing cornections, in the left histates and I declare under penalty of jorguey that it is true and correct.

Thate And time 1-12-82 7:25

a tuessed i fere 9 Vom

Shenrus Harris Nuclear Station Menny Caks, NC -

I. Mr. J.Y Vorse who has identified hinself to me as an investigator with the U.S. Nuclear Regulatory Commission I make this statement treely with no threats or gronises or reward extended to me. Mr. Vorse is ariting this statement for me at my request.

Extender 22 1980. I did one week or required reading and took 5 examinations whereyou I was certified as a welding inspector. I had 10 years of previous welding inspector. I had 10 years of previous welding experience and certified in AWS, ANSI, ASME, NDE, POHT

Stud Wilding, and others except for RT.

I began inspecting hangers in October 1980 Afest of thes were those which had to be reinspected but I inspected some new over, too I worked with a trainer nord Stove Montastle most of the time. Engineering grounded us with the checklist to use While reinspecting the worlds we noticed, although we were not looking for them, numerous, what I consider correcte defects. That is, things like splatter, are strikes, welder symbol on heat effected zone. We told Wic Sofarial the Of welding inspection supervisor about this and he said to start putting the infinited on the drawing. We then shorted putting reject

on the chethist and enquering would evaluate. From to this we rejected the hower weld only if the defect not on the cheet list was so flagrent that the weld was not passable. Many of the welds to be reinspected we could not see too well because there was so much rust on them we had were brushes to clean them with but really a power wire brush and required to clean the weld up rough to really see it.

The welding resuspection groging was finished about Fab.

rung or March 1981. I then went to dedicating most of my

time suspecting new pipe haugers. I did this for months

by regself with hovember 16, 1981 when Ken Stanley,

a trainer, started helping me. Regarding the trainers, I

was always with then when they suspected the welds. I

decline to state where my exact suggested facation and

except that I was in the viernity of always signed the

papernest when the trainer found that a weld was

occeptable.

Sonotime around April 1981, Ebasco started sending revisions for the reinspection of gipe hangers. On about 100 or so hangers, during about a 3 month period, welding unspector's uns not required, it only required a welding inspector's significe. I can not going to sign anything unless I was sure the hanger was there and not cut down or something I reget would go all over the plant to look at these hangers and I would have a welder or gipe fitter, or go up the scorffelds or hadder, I present, to put

was imputed to the latest win a for 2/17/8

the sticker on the harger reflecting the lastest consider. Also, during the month of July 1981 I developed a bad care of arthritis and had difficulty getting around but the foremen were congerative about getting someone to help me with ladders, scattlets ste.

About 2 months ago I am told to reject welds for gaps and members of weld size was not increased. As a result I had to reject welds which were groper according to the drawing but not the traveler with engineering comments. As a result several welders got reprimared and hold that if they got 3 rejects they were fixed. It am about the time that rumons were started about me.

Also, on the occasion while inspecting a hanger and there is another hanger finished in the vicinity. I will inspect that hanger ever though I don't have the reject chit. I use the bornow's preside while inspecting. I all later sign off the chit when I get it, taken usually within a day or two. To me this represent a good acreing relationship with welders because if I have a reject, they can repair the wold without getting a reject out in trouble.

I wish to state that I have sever signed out a will that has
not been looked at his someone who I had an governed.

I have rest the foregoing statement consisting of the three headwe then gages I have made any necessary consentence and withole.

Then we set to statement is the truth to the hat it my
thankely go and hel it I declare water gown thy of my my
that the foregoing is tone and correct.

2 Fin

Sherron Harris Abeleur Plant Metay Cats, NC December 15, 1981

I Steve W Montenstle hereby note the following whethery statement to Mr. J. V. Vorse who has identified hinself to me as an Investigation with the U.S Ancher Legalating Commission I mate this statement lavely with no threats or granises extended to me.

I am pecserry a QA Welding Ing. I inspecting pemally Hangers. I have been weeting AT SHADD for 36 pes. with lie QA welding Expidience. CERL fied me in Visual Examination of welds. I began my feeining in 9/80 is permely. I exert about & of to my time with we were areting 60 he was Afree I nownes I began inspecting hangers be that were hard to get to. would fill out the street ON Accept states And give them to me. If I found the hassee acceptable I would apply seeps to It rejectable I would when of the publims and be he would record He peoblems on seismic I wix (44-34). He would put his inisiple on all decumentation

By putting his in Links on the DF-34 then, he stated he old the inspection. There were about 50.75 hengers which I did the inspection for him, most of them were at heres to get bookions, booked mostly in \$ 190 cl. 4 236 El. of RAB. All this occurred getiene I secreme contied in 1/81. Once I become costitied I did the inspections myself. Before I was certified in my opinion I are-inspected any hanger where of grations the welds were question poer. It we suce of a well I would reject it. In my opinion the welds were sthat were accepted were ACCEPTABLE to AWS DI.1-75 Standards. I have read the foregoing statement consisting of two Handweitten gages. I have made any necessary correction and initialed they in int. I have signed the first gage in the 1-14 hand maryin. this sharest is the truth to the best of my trouledge and belief. I declare order poulty of perjury that the foregoing is true and correct.

utressed for the subject to the set

Sherrow thins Kucher Plans Hong Oats, NC December 15, 1981

I Reveal to Stanley unter the following colorating statement to 181. J. 4. Horse who has identified himself to me as an Investigation with the U.S. Nuclear Regulating Commission. I mate this statement freely with no threats or promises extended to me.

Extende 8, 1981 I certified as a welding inspector in early revender, 1981. I was required to get to hoves OTT to become certified. I also had 6 years welding experience and two years of technical school training in testallurgy from to working for CPIL. During the month or ahhr 1984 I and receiving OUT for juge hangers with providing my incharchen I would estimate I spect a week, and I you hoves sech week, inspecting the juge hangers joinanity in aboution 236 in the Receive Auxiliary Building, prior to my certification of the first for the private of the private of the sound of the section of the sectio reation. I estimate that about 75% of the hungers were inspected by me alove. These were the over high in and required clinking on the scatteld's and these alich were inaccesable. These were Sw. cc and to hongers mostly I would give me the stickers and at would climb the scottill and inspect the honger wild while it stayed on the floor the sticker had also

Tin 3 Stanley

been filled out by I If I greated the world, I faced the states on the hanger icontal without the world the states on the hanger icontal without the world by one, I would tell Jahrt as arong with the weld, the first couple of times he climbed up that significant world at the welds and boted at the welds and afthe after the agreed will me there atten he accepted all of any rejected welds. I would estimate this type of situation occurred on about 100 houses before I was certified, However, I was so bory trying to tearn all of the facets of the job I really did not may after that to the worker of heaven I enspected. The welds I inspected I did according to ANS Delete 1975 section 9.

I have read the facejoing statement consisting of two headwritten pages. I have made any necessary corrections

I have read the foregoing statement consisting of two headwritten gages. I have made any necessary connections and thirtialed them in int, the loose write the statement as my request. This statement is the truth to the best of my knowledge and belief I declare under powelly of property that the foregoing is true and correct.

Dote und time 12-15-81 11:40 AM

theised by the Trustight

SAI Homes Site

December 15, 1981 Sherrow Harris Nucleur Site December 16, 1981

I, Pound A. Sands make the Relowing free and voluntar statement to Mr. J. y lorse who has identified himself to me as an investigator with the Ch.S. Nucleur Regulatory Consission I make this statement with no threats or promises extended to one. Mr. Vorse is writing this statement for one at my request.

I am working for Onniels Construction Conpay, technical Services transfer of CP+L OA welding as a welding inspector. When I first started on this assignment in late September 1980 I did some welding inspections with a QA welding inspector for CP+L. The first couple of evenings had me climb around the scalefuls and click the webs. He would do the figurance on a Saturday, I was up on a scotfill and looked at a weld on a hanger brace which was welded on 3 sides only. The top portion of the brace had so weld. I related this to and also related that there was avolted brace to feet away that I could not see I observed who was standing on the floor about 25' below the brace, shine his floor for the brace and soid it was cit. Norther of its got any closer to the brace I wis not bay;

[Fonald Lands]

about this and rejorted it to & terry White the Wilding Supervisor. He said words to the itself. I think they work was said about this incolered. I declined to work with a feelined to work with a feel that. I have read the above statement consisting of two pages. I have made any corrections and initiall then in int. This statement is the truth to the best of my knowledge and belief I declare under finally of pergueny that the foregoing is to se and correct.

Declare under finally of pergueny that the foregoing is to se and correct.

SRI Horns s.ke

Shearen thoris Nuclear S. Merry Oaks, DC December 16, 1981

I, Wavey C. Sutton more to following free and wown try shlement to Mr. J. Y. Wanse who has redentition himself to me as an Investigator with the U.S. Nuclear Regulatory Connission. I make this statement with no threads or provises extended to me. Mr. Wonse is writing this statement for me as I discuss it with him:

I an a welder for Daviels Construction Company, crew 6-20. I have been working in the waste grocers are elevation 236, which adjoins the RAB. Sometime in list spring or early surmer, I was assigned to assist a QA welding inspector. Normally, when I worked with lete trigen I should him where the weld were and he went from there. It is a QA welding inspector, thousand, with almost always he was hard me the QA stater, aircredy filled out, and I would climb up the ladder, scattled or underweath it dipe and attach the stater. Leveld sign the paper would be usually cleek the weld. He hould stay on the floor. This was on a Saturday and it was just him and me. There was no one also presented. I would I would

[Nancy C. S. stine]

estimate that I attached stactors to at least 100 category 6 and 7 ffing siges (Now safety related). This is the only time I worked with "I have also hard the same thing from some other fingle who have worked on safety related systems. Kin North told we that does not inspect that it they are high. Kilgore works in that does not look at the webes. Kilgore works in that handling now but did work in waste process on one crow for awhite. I have read the foregoing statement consisting of two pages. I have made any accessary consections and initialed then in ink. At these This statement is the truth to the best of my knowledge and belief. I declare under pountly of perjuay that the foregoing is true and correct.

Date + Fine 12-16-81 -11:00 Am

Gut Myself The Spector



CAROLINA POWER & LIGHT COMPANY SHEARON HARRIS NUCLEAR POWER PLANT

STORAGE !	OR SHEARON HARRIS NUCLEAR POWER PLANT
Applicable	- FCR's: DCN's:
Affected Paragraphs	Description of Deviation
	PLEASE CHANGE PARFGRAPH # 1 ON PAGE Z TO READ
	AN FOLLOWS:
	FOR EQUIPMENT LANDED IN THE POWER BLOCK THE
	FORMS WILL BE TRANSMITTED TO THE MAINTENANCE
	CREW SUPERVISOR. SHOULD IT BECOME NECESSARY
	TO REVISE FIELD MAINTENANCE LOGY INSTRUCTIONS
	THE REVISION WILL BE MADE ON THE ORIGINAL
tas	LOGS AND A COPY WILL BE TRANSMITTED TO THE
	MAINTENANCE CREW SUPERVISOR THE OLD REVISION
	OF THE WORKING LOG WILL BE DISPOSED OF THE
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4.5	ITS INCORPORATION IN THE MAINTENANCE PROGRAM
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	SHOULD TAKE NO LONGER THAN TWENTY- EIGHT DAYS
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- 516164	
	SHEARON HAR US N. P.

The approval of this Procedure Deviation Notice authorizes deviation from the named procedure to the extent described above.

The holder of the affected procedure shall retain this notice with the procedure until the next procedure revision is in effect.

arrangement (Approvals	Date
Originator	Van Welson	13/10/01
CP&L	14m Jun	12/1-12

60

MAR 11 1978 L. DOCUMENT CONTROL

SHEARON HARRIS N. P. P.

CAROLINA POWER AND LIGHT COMPANY SHEARON HARRIS NUCLEAR POWER PLANT

DEC 1 1981 R. 15

PGD-002 (AP-XIII-07)

6 1981R.14

MATERIAL MAINTENANCE REQUIREMENTS DURING SEP 1 8 1981 R.13 STORAGE FOR SHEARON HARRIS NUCLEAR POWER PLANT

OCT 09 1979 RIO JUL 27 1977 K7 MAR 3 1 1981 8.12

OCT 3 0 1980 E.II MAY 10 1977 MAY 26 1978 85 FEB 22 197 46

1075 Rev 1

Rev Description Approvals Date 0 First issue transmitted Originator by Document Control Resident Enginee Originator Changed All Over Resident Engineer Originator General Revision Resident Engineer Originator 3 General Revision Resident Engineer Originator Revised As Noted Resident Engineer Changed paragraph D. I Originator 5 ... Electric Motors - Attached Resident Engineer Revised Maintenance Log Fm Originator Revised As Noted Resident Enginee 7 .. Originator Revised As Noted Resident Enginee Originator 8 Revised As Noted Resident Enginee 9 Originator Revised As Noted Resident Enginee Added Identifying Originator 10 Procedure Number. Revised as Noted. Resident Enginee

CAROLINA POWER & LIGHT COMPANY SHEARON HARRIS NUCLEAR POWER PLANT

PGD-002 (AP-XIII-07)

MATERIAL MAINTENANCE REQUIREMENTS DURING STORAGE FOR SHEARON HARRIS NUCLEAR POWER PLANT

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12	Revised As Noted	Originator :	19. Democr	
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Company Correspondence

Far- 142

March 29, 1982

MS-9456

MEMORANDUM TO: Mr. B. B. Isom

PROM: A. H. Lucas

SUBJECT: Shearon Harris Nuclear Power Plant

#67 Stone Gradation Problem

As a result of the increased numbers of failing gradations at the batch plant, I requested that the situation be investigated.

Billy Pridgen and Jim Paul visited the Wake Stone Quarry in Moncure on Friday, March 26, 1982. They found no reason for our gradation problem at the quarry. We observed their gradation records for the month of January 1982. They parformed several gradations per day during this time with all tests meeting the required gradation bend. Several times during the month a state inspector was present during the sampling and testing. They toured the stockpiles of \$67 stone and observed the loading of two trucks from the stockpile. The stockpiles are constructed on a stone mat to prevent soil contamination. The stone is end dumped at the base of the stockpile and them pushed into the stockpile by end loader. The total height of a stockpile is approximately 10 feet. It should be noted that Wake Stone has stockpiled \$67 stone for our use and no further gradation changes can be made at the quarry.

Jim Paul toured the batch plant stone handling area on Tuesday, March 13rd with Bill Cagle. Bill ran through the sampling and testing procedures used by QA. All of the failing tests during January, February, and March 1982 were on the over 200 yd gradation tests. These samples are obtained when the quantity of concrete placed in one day exceeds 200 cubic yards. The daily sample is pulled at the end of the work day and a wet sieve analysis is performed. If the wet sieve analysis is out, the stockpile is drawn down and another sample is pulled. This procedure is repeated until a passing wet sieve analysis is obtained. The failing material is pulled from the plant and passed through the screening plant before returning to the stockpile.

The failing tests are caused by the method of stockpile construction. The stone is deposited in a cone shape by an elevated conveyor. The stone is pulled from the stockpile by gates under the pile. As the stone is pulled from the pile, an inverted cone is formed. This procedure tends to pull the smaller size stone down into the gates first. The problem may be corrected by constructing a flat stockpile and then not drawing down the stockpile so low that large inverted comes are formed. We have suggested this several times before, and each time it is implemented, the gradation tests are acceptable. Please ensure that the

personnel at the batch plant are aware of our concern over this increased rate of failing gradations and that the above recommended action is taken to reverse this negative trend.

am fun

JEP/sb

cc: Mr. R. M. Parsons

Mr. E. L. Kelly

Mr. W. O. Pridgen

Mr. J. R. Paul

Mr. R. Brown

Mr. G. L. Forehand

L THE ADDRESS OF THE PERSON OF

CAROLINA FOWER & LIGHT COMESY CORPORATE QUALITY ASSURANCE DE ARTHEUT

DEFICIENCY AND DISPOSITION REPORT

	Procedure COC.	-2)			_	
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P-42, WP-203+EBASCO 2168 SERIES	DRAWING5	11/1	7 11.0	Y. Koo	DDR Evaiu	ation
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repesed Disposition: DPermapent Walver DRepair DRevork I Peject Accept -as-is CUpgrade Code Certification Downgrade Item Wother describe below etails: Approved By: ecommended By: Proj. Gen'i Mar. Dr. Rus. Enar. Discipline Engineer/ Cate Mgr. HPES/ General Mgr. Responsible Supervisor Corrective Action and Final Disposition 2:es Documented Cause & Preventive Measures required: □ No Signature Details: Cause: Preventive Measures 55 54 Approved By:

CAROLINA POWER , LICHT COME A SHEARON HARRIS MUCLLAS POWER PLANT POTENTIAL REPORTABLE ITEM TRAVELED (PART 50 ITEMS)

Statut it .

Traveler No: - DR/DDR/NCR/RET Subject: CARLE TRAY STEPPET INSPECTION Signature Date CI/QA Supervisor Initiate Traveler Attach DR/DDR/Nex/RIR and other Data 2. CI/QA Unit Supervisor & Discipline Engineer (Civil/Mech/Elect) В. Review and Check, as Applicable Condition Represents: Yes Deficiency in Design Deficiency in Construction Breakdown in QA Program Nonconformance of Design to SAR/CP Wonconformance of Construction to Design Damage/Defect Deviation from Performance Specs Reportability Evaluation: Item is significant/indeterminate. Need other evaluation. Item is not reportable per paragraph of this procedure. Comments (Attach Data, as Appropriate): Site Management Review and Check, as applicable Reportability Evaluation: Yes No Significance for Reportability Could Adversely Affect Safety Is Reportable/Potentially Reportable Comments (Attach Data, as Appropriate): If Reportable/Potentially Reportable, Notified: (CP&L Management) b. (E&C QA) If Reportable/Potentially Reportable: Initial written report due Report responsibility assigned to:_ Site Quality Assurance D.

Distribute Traveler Maintain File of Traveler and Data Package

Site Manager*
Lenior Sesident Engineer
Report Preparer* ROBER COTO Distribution: Discipline Engineer T.C

Project Manager DCC*
Manager DF*
Senior Construction Manager*

CORPORATE CLALITY ACCUPATION OF ST

CA SUBMETHINANCE SERVET

DATES PERFORMED: 2/24/03_5/4/

PAGE_/_ CF ____

SUBVETILIANCE ACTIVI	TY/AREA/LOCATION/ELEV	ATION:		PEFERENCE DOCU	
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CORPORATE GUALITY ASSURANCE DEPARTMENT FAGE 2 OF 2

CA SURVEILLANCE REPORT

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TO: ALL GA-S PERSONNEL

FROM: D.C WHITEHEAD

DATE: APRIL 29, 1983

SUBJECT: DOR NUMBERS

PRODUCTIVITY, EFFECTIVE IMMEDIATELY DDR NUMBERS MAY
BE OBTAINED BY QA-S INSPECTORS/TECHNICIANS SO THE

DDR NUMBER CAN BE SHOWN ON "HOLD TAGS" ATTACHED

TO ITEMS. THIS WILL ELIMINATE OUR CURRENT

PRACTICE OF APPLYING "HOLD TAGS" WITHOUT DDR NUMBERS

AND RE-TAGGING VIHEN THE DDR NUMBER IS ISSUED.

TO PRECLUDE PROCEDURAL VIOLATIONS (I.E., TIME VIOLATIONS
EYCEEDING FOUR DAYS) AND EXTRANNEOUS WORK (WOIDING DARS

WHEN IT IS DETERMINED THAT A DDR CONDITION DOES NOT

EXIST). THESE DDR NUMBERS ARE TO BE OBTAINED ONLY

AFTER DISCUSSION WITH AND CONSENT OF THE APPROPRIATE

SPECIALIST.

FOR D.C. WHITEHEAD

CON RATE CLAUSE ASSURANCE DEPARTMENT

(Frocedure CQC-2)



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Preventive Measures:

Approved By:

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TA POWER & LIGHT CONTANT. SELATO HARRIS NUCLEAR FOWER FLANT POTENTIAL REPORTABLE ITEM TRAVELER (PART 50 ITEMS)

AP-13-1

Traveler No: -DR/DDR/NCR/RIR Subject: Inforting of Spring Polared Bouigner Signature CI/QA Supervisor Initiate Traveler Attach DR/DDR/NCR/RIR and other Data CI/QA Unit Supervisor & Discipline Engineer (Civil/Mech/Elect) B. Review and Check, as Applicable Condition Represents: No Yes Deficiency in Design Deficiency in Construction and Breakdown in QA Program Nonconformance of Design to SAR/CP Nonconformance of Construction to Design Damage/Defect Deviation from Performance Specs Reportability Evaluation: Item is significant/indeterminate. Need other evaluation. Item is not reportable per paragraph of this procedure. Comments (Attach Data, as Appropriate): 2. Site Management C. Review and Check, as applicable Reportability Evaluation: No Yes Significance for Reportability Could Adversely Affect Safety Is Reportable/Potentially Reportable Comments (Attach Data, as Appropriate): 2. If Reportable/Potentially Reportable, Notified: 3. (CP&L Management) b . (ESC QA) If Reportable/Potentially Reportable: Initial written report due Report responsibility assigned to:_ Site Quality Assurance

Maintain File of Traveler and Data Package Distribution: Site Manager* Engineer

Distribute Traveler

Project Manager DCC* Manager HPE* onstruction Manager*

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CAPOLINA FORER & LIGHT COME? CORPORATE QUALITY ASSURANCE DESARTMENT

QA/OC REPORT CONTINUATION SHEET

Report No. DDR - 797 Page & of 4

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(2). Borie acid transfer Pump 1B.SN.
(3). Service Water Booster Pump 1B.SB.

- (4). AH-7 IA-SA.

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AP-XIII-0

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DEFICIENCY AND DESPOSITION REPORT

D DDR N

DDR No. Page 1 of 3

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PGD-001, Rev. 22; PGD-002, Rev. 15	rocedure of 0	ther)	NCR No.	KD9	Holler
Deficiency Details:			17.8	75.0	DDR EVALUATION
A QA surveillance of material maint nonconformances applicable to the 1 Cranes (PO 435202) and the 50 ton E (PO 435203), all of which are store tenance logs for these items were rinspection of the actual items was crew electrician was present to permotors. For deficiency details, see continu (3) cranes have been placed on QA F of this DDR.	quipment Remoded in yard 12. eviewed, and performed. Form meggering that ion pages.	ton FHE byal Cran The ma a visual maintening of the	ance three ton	uhi	Construction Phase Engineering Phase QA Program Violation Specification Deviation Procedural Deviation Unacceptable Workmansh Damage Other Not Reportable Site QA Engr. HP QA/QC aluation by NPCD.
13 Hold Tags Applied Final Disposition: Verified	☐ Hold/	Reject t	ags removed		
<u>lemarks:</u>	Accept	QA/QC I	nspector		Date
Distribution:	ANT CORCU	NAME AND POST OF PERSONS ASSESSED.	pecialist	ection	Date III Items Only):
Orig: Director - QA/QC - SHNP cc: Site Mgr./Sr. Res. Engr. Initiating QA/QC Specialist					
Accounting Mgr E&C QA/QC			Nuclear In	spector	Date
Mgr HPES A-E Site QA Representative NSSS Site Representative	Report Ci				10°59 \$
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CATULINA FORE & LIGHT COMPANY CORFORATE QUALITY ASSURANCE DEPARTMENT

QA/QC REPORT CONTINUATION SHEET

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- 1. The 100 horse power motor on the trolly frame of the 150 ton crane has not been meggered since receipt. This was evidenced by the fact that when the electrician went to megger the motor in the presence of the undersigned inspector, no megger lead wire could be found. The electrician stated that the motor has never been meggered. The maintenance log for this motor has been signed off to indicate the meggering has been performed at scheduled intervals since receipt on 6/16/80.
- Engineering instructions and maintenance logs do not exist for the 12 ton Auxiliary Crane.
- 3. The engineering instructions for the 150 and 50 ton cranes are not adequately reflected on the maintenance logs as required. Therefore, documented evidence that the maintenance required by the engineering instructions has been accomplished, is not available. The following are specific examples:
 - A. The 1981 engineering instructions require the 150 and 50 ton cranes to be inspected both annually (for lubrication purposes) and on a 3 month basis (for general purposes). However, this maintenance (inspection) was scheduled only once on the maintenance log of the 150 ton crane, while not being scheduled at all on the log of the 50 ton crane.
 - B. The 1980 and 1981 engineering instructions require the electrical cabinets of the aforementioned cranes to be inspected for deterioration at 6 month intervals and recovered with poly when necessary. However, these inspections were not scheduled on the maintenance logs for either crane during 1980 and 1981.

Note: A visual inspection of a number of electrical enclosures covered with poly revealed trapped water within the poly covering the items.

- 4. Visual inspection of the Hoist Brakes on the 150 and 50 ton cranes revealed that the brakes were not covered with poly and dessicant placed within. The 1980 maintenance logs for each crane require that this action be performed and the logs have been signed off to indicate that it was.
- 5. Visual inspection of all three subject cranes revealed numerous instances where bundles of internal wiring are either lying uncovered and exposed to the elements, or moisture is entrapped within deteriorating clear poly applied by the vendor.
- 6. There are no signatures on the 1982 maintenance log of the 50 ton crane to indicate that the Hoist and Hoist Brake were rotated in January 1982 as required by the instructions.

CARCLING AND & LIGHT CONTROL C

QA/QC REPORT CONTINUATION SHEET

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7. The on-site maintenance/storage requirements for subject cranes differ from those recommended by the vendor without any record of HPES concurrence as required. This is evidenced by the fact that Kranco long-term storage procedure SP-029 recommends that all items of a smaller nature (i.e. smaller than girder assemblies) should be stored indoors. Since receipt, all sub-assemblies of a smaller nature and mechanical items (i.e. motors) have been stored outdoors.

CILE Cury S

5.3.1.1 QA Accepted items will be stored in designated storage and laydown areas.

Items on QA HOLD shall be segregated, when practical, to await disposal or correction. When not practical to segregate QA HOLD items, they shall remain tagged and may remain in their storage or laydown area to await disposal or correction.

Rejected items will be identified and controlled in accordance with approved procedures waiting disposition.

- 5.3.1.2 Identification tags or marks shall be retained on each article, or when impractical, in records traceable to the article.
- 5.3.1.3 Handling, storage and preservation procedures shall be applied.
- 5.3.1.4 Stock items shall be monitored to assure that perishable items are removed or identified and controlled to assure proper disposition at the end of their specified shelf-life.
- 5.3.1.5 Measures shall be established to authorize and control the release of material and equipment for use.

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CO RATE QUALITY ASSURANCE DEPART 7

DEFICIENCY AND DISPOSITION REPORT

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	DDR No.	1
	Page 1 of	-

. n/Activity Name or Description	Shop Order	Code	Quantity	Unit	Quality Assurance Num (Purchase Order & Ite
Insp. of Safety Related Equipment	N/A	Class	5	111	No.) QA- N/A
Serial, Heat or Other Identification No. (Specify) See Below	Supplier or	Manufac	turer	□CP6	of Procurement L PO
Violation (Specification, Drawing, Pr		ther)	NCR No.	STREET, SQUARE, ting Inspector	
				_	. 7
AP-XIII-07 (PGD-002); WP-106, Para Deficiency Details:	. 3.8		N/A	F. M	CCurdy EVALUATION
on 1/19/82, it was noted that the removed to facilitate inspection f PGD-002. Exhibit 1 to WP-106 was this inspection was performed. Se informing NPCD of similar discrepa equipment is affected. SECTION III	or damage as signed off in e attached sp	required ndicating need lett	that ers	Evaluate Date der eva	Engineering Phase QA Program Violation Specification Deviation Procedural Deviation Unacceptable Workmans Damage Other Not Reportable Site QA Engr. HF QA/QC ted by 1/22/82
Distribution: Orig: Director - QA/QC - SHNP	Accept	QA/QC I	nspector Decialist ASME Code S		Date Date III Items Only):
n'- V /n- N Page					
cc: Site Mgr./Sr. Res. Engr. Initiating OA/OC Specialist					
Initiating QA/QC Specialist Accounting Mgr E&C QA/QC	Au	thorized	Nuclear In	spector	Date

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CARCLINA POWER & LIGHT COMPANY CORPORATE COALITY ASSURANCE DESARTMENT

QA/QC REPORT CONTINUATION SHEET

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- Boric Acid Transfer Pump 1A-SN
 Boric Acid Transfer Pump 1B-SN
- 3. Service Water Booster Pump 1B-SB
 4. AH-7 1A-SA
 5. AH-7 1B-SB

DETAILS OF INVESTIGATION

CAROLINA POWER AND LIGHT
SHEARON HARRIS NUCLEAR PLANT
DECEMBER 14, 1981 - JANUARY 22, 1982

INDIVIDUALS CONTACTED

The following individuals were contacted during the course of the investigation.

Carolina Power and Light (CP&L)

G. A. DeBarres, QA Weld Inspector

. A. Douglas, QA Weld Monitor

L. Faulkner, QA Weld Control and Surveillance

M. Freeman, QA Weld Inspector

A. B. Giles, QA Technician
J. C. McDonnell, QA Weld Inspector

A. Lucas, Senior Resident Engineer E. W. Mercer, QA Weld Inspector

S. W. Montastle, QA Weld Inspector

R. M. Parsons, Site Manager W. H. Pere, QA Weld Inspector

K. B. Stanley QA Weld Inspector

R. B. Strickland, Mechanical Inspector

G. G. Tingen, Weld Inspector T. Wait, QA Welding Supervisor

Daniels Construction Company

Crew P-21: Reactor Audiliary Building (RAB)

R. V. McLeod, General Foreman W. W. Burton, Pipe-Fitter Helper

R. J. Carr, Welding Forman

J. F. Goodsell, Welder

B. W. Nguyen, Welder

K. M. Norton, Welder J. A. Owens, Welder

G. S. Peck, Pipefitter

R. D. Symank, Welder

M. D. Warlick, Welder

Crew P-35 (RAB)

W. T. Bohan, Foreman

D. L. Cauble, Welder

R. W. George, Pipe-Fitter

W. J. Jenkins, Welder

T. R. Merideth, Welder

M. D. Tatham, Welder

J. C. Woznick, Welder

Crew P-17 (RAB) D. E. Bradford, Pipe-Fitter C. A. Brigman, Foreman R. L. Grant, Pipe-Fitter T. M. Lazafame, Pipe-Fitter W. H. Martin, Welder J. E. Newsome, Welder J. B. Starnes, Pipe-Fitter Helper L. L. Whitehead, Pipe-Fitter S. 3. Whitlock, Fitter Crew P-14 (Waste Process) R. A. Gardner, Foreman W. C. Lynch, Welder T. Smith, Welder W. B. Surber, Welder Crew P-20 (Waste Process) J. A. Brincheck, Welding Supervisor K. T. Davis, Pipe-Fitter Helper J. D. Foster, Pipe-Fitter D. P. Freeman, Welder 1 C. F. Green, Jr., Welder J. W. Kilgore, Pipe-Fitter Helper J. F. Lynch, Pipe-Fitter D. C. Martin, Welder D. M. Shargots, Welder R. R. Stone, Pipe-Fitter N. C. Sulton, Welder G. G. Wilbon, Welder

Daniels Technical Services, Ltd.

D. A. Sands, QA Welding Inspector B. L. Holcombe, QA Welding Engineer

Nuclear Regulatory Commission (NRC)

G. F. Maxwell, Resident Inspector

ALLEGATION

Occasionally, a welding inspector, individual A did not visually inspect welds on seismic hangers and piping. However, he signed documentation showing that he had.

C. BACKGROUND

The Resident Inspector at Shearon Harris nuclear site expressed not looking at some welds he was signing off as acceptable. One individual stated to the Resident Inspector that if a weld was located in a difficult to access location, Individual A would not acquire the appropriate scaffolding to allow him to have access to the weld to be inspected. The Resident Inspector was further informed that he could find an unaccentable weld on seismic category 1 pipe hanger numbered The Resident Inspector looked at the welds on that hanger and found no rejectable welds. However, on an adjacent hanger, No.1 the Resident Inspector found what was, in his opinion, a rejectable weld. It was later determined by the resident inspector that this weld had been inspected by Individual A. Three additional hangers were looked at by the Resident Inspector and no rejectable welds were noted.

D. INTERVIEWS OF WELDING INSPECTORS

Eight weld inspectors including a supervisor, as well as four other personnel involved in the QA weld inspection program were interviewed by the Investigator. One individual stated he had heard rumors that Individual A "inspected from the floor". Two individuals stated they heard rumors that Individual A sometimes shined his flashlight on hangers from the floor but did not go up and visually check the welds. Five individuals stated they were aware that Individual A had a very bad case of arthritis during the summer months of 1981 and were surprised when they saw him up on the scaffolding. Two welding inspectors, Individuals B and C, stated they inspected welds before they (the inspectors) were certified. Individuals B and C provided the Investigator with signed statements which contained the following information in essence:

Individual B (Montcastle) started work as a welding inspector trainee beginning sometime in September 1980. Initially, he was under the direct supervision and received on-the-job-training from Individual A. Individual A showed him what to look for regarding acceptability and when to reject a weld. After at ut 2 months, Individual B began inspecting

welds by himself, particularly in areas which were relatively inaccessible and high up. Individual A remained on the floor signing off the weld inspection documentation and provided Individual B with a sticker showing the weld had been inspected. Individual B placed the stickers on the hangers on which he had inspected welds. Individual B estimated that he had inspected welds by himself on approximately 50-75 hangers, most of which were on the 90ft. and 236ft. elevations in the Reactor Auxiliary Building. Although he inspected the welds prior to being certified in January 1980, Individual B had no misgivings about those welds he accepted. In fact, he believes he was on the conservative side and inspected all welds in accordance with AWS D1.1-75 Standards.

Individual C (Stanley) began his on-the-job-training with Individual A in October 1981 for pipe hanger welding inspection. Individual C estimates that he spent 3 weeks, 40 hours per week with Individual A and, although he could not recall how many hangers they inspected, he estimates he alone inspected about 75% of the welds. That is, those welds which were difficult to get to because of the need to climb scaffolds or physically difficult to get to. When he rejected welds the first several times. Individual A climbed the scaffold, looked at the welds and agreed they were rejectable. Thereafter, Individual C rejected and accepted welds without Individual A looking at them. Individual A always signed the weld inspection forms (Weld Data Report (WDR QA 34 and traveler)) as well as the weld inspection sticker. Individual C estimates that he inspected welds on about 100 hangers by himself before he was certified. In all of these situations, Individual A signed the documentation. Like Individual B, Individual C had no reservations about the welds he had accepted. He also inspected the welds according to AWS D1.1-75 standards.

E. INTERVIEWS OF CRAFT PERSONNEL

Forty-two Craft personnel comprised of welding foremen, welders, pipe-fitters, and pipe-fitter helpers were interviewed by the Investigator. Twenty-seven individuals had no knowledge of Individual A and could provide no pertinent information. Three individuals stated they heard rumors that Individual A would inspect from the floor and shine his flashlight on the welds. Five individuals stated they observed Individual A performing inspections on welds which were high up and difficult to get to. One welder, Individual D (Sutton) stated that Individual A accepted welds without looking at them. A signed statement was provided to the Investigator by Individual D which contained the following information in essence:

Sometime in the late spring or early summer, Individual D was assigned to assist Individual A in locating and providing access for inspection of welds on piping. This transpired on

a Saturday with no one else in the general area. The pipes were located in the waste process area, elevation 236. Individual A remained on the floor and Individual D climbed the scaffolds and ladders, placing stickers on pipes signifying the welds had been inspected. Individual A signed off the paperwork. Individual D estimates that this activity took place on approximately 100 welds, all non-safety Category 6 and 7. Individual D expressed concerns to co-workers and opined that this was the source of all the subsequent talk going around the plant about Individual A not inspecting the welds. Individual D thought Individuals E (Norton) and F (Kilgore) may have knowledge about similar occurrences.

Individual E (Norton) was interviewed and stated he had no first hand knowledge about improper welding inspection. Individual E only acknowledged hearing rumors that Individual A had welders put stickers on pipes for him. Individual F (Kilgore) was interviewed by the Investigator and he provided a signed statement containing the following information in essence:

Individual F, a pipefitter helper, estimates he assisted Individual A in locating welds approximately 500 times. Most of the welds were easily accessible and were looked at by Individual A. On one occasion, however, in September 1981, Individual A glanced at two category 7 (non-safety related) welds which were located approximately 20 ft. above him. These were off the "MY column" and "column 2" of the East-West Hallway of the waste process area. Individual A signed the inspection sheet and handed the carbon copy to Individual F for the craft records. He also gave Individual F two filled out stickers instructing him to place them by the welds. However, Individual F did not do so because there was no scaffolding or ladder available, so he took the stickers home. Individual F was later requested by the Resident Inspector to provide him with L.e stickers. Only one was still available and this was given to the Resident Inspector by Individual F. This same sticker was later provided to the Investigator. The sticker bears the initials of Individual A.

Based on the information provided by Individual D regarding Individual A's not inspecting welds on a Saturday when no others were in the indicated area, a foreman, Individual G (McCleod) was asked to provide the names of craft personnel who assisted Individual A on Saturdays. Individual G provided those names to the Investigator. They were: Individuals H (Jenkins), I (Robinson) J (Cauble) K (Giles) L (Bradford) and M (George) Inese personnel were interviewed. Individuals H, I, J and M stated they observed Individual A inspect welds from scaffolds and ladders on Saturdays

and he always appeared to be inspecting carefully. Individual stated he observed Individual A inspect the welds although he seemed reluctant to go high. Individual L stated he assisted Individual A with approximately 100 weld inspections. On one occasion, Individual A shined his flashlight from a distance and accepted one weld. This, according to Individual L, was on code 6 and 7 non-sety related piping, located high off the floor.

F. INTERVIEW OF INDIVIDUAL A (WELDING INSPECTOR)

Individual A was interviewed at Shearon Harris on December 17, 1981 and he provided a signed statement containing the following information in substance:

Regarding signing off welds that he did not actually look at, but which were inspected by trainees, Individual A explained that he was always within close proximity to them. When questioned by the Investigator as to whether or not he remained at floor level while the trainee inspected welds high on the scaffolds, Individual A declined to state where his exact physical location was except that he was in the "immediate vicinity". Individual A explained that sometime around April 1981, EBASCO began sending revisions requiring reinspection of some pipe hangers. Subsequently, for about a 3 month period, Individual A went out and looked at the respective hangers. No welds had to be inspected but he did have to verify the hanger was physically present. Therefore, Individual A would often shine his flashlight on the hanger while standing on the floor to ensure the hanger was present and in its proper location. He would then sign off the revised drawing and give to whoever was assisting him, a sticker indicating the date the hanger was "inspected" to the latest revision. The assistant would then place the sticker somewhere on the hanger. Individual A believes this may have been misconstrued by others in the vicinity that he was signing off welds without actually looking at them. In fact, none of the welds on the hanger required any inspection. Individual A estimates that he inspected approximately 100 hangers in this manner. Individual A denied having not inspected welds on pipes or hangers, but signing them off as acceptable.

G. WELD INSPECTIONS BY NRC

Based on the statements, made by several individuals, that Individual A signed off pipe welds without inspecting them, the Region II Engineering Inspection Branch was requested to conduct an inspection of randomly sampled welds on hangers and pipes. It was further requested that they draw samples from:

Areas which were relatively difficult to access; welds which were inspected on Saturdays; and

Welds which were inspected during the April-September 1981 time frame.

2.1

The results of the reinspection of welds conducted by NRC inspectors are documented in NRC Inspection Report Nos. 50-400/82-01 and 50-400/82-06. A summary of that inspection is included herewith as Enclosure 1. Two violations were identified by the inspectors and they are discussed in the referenced inspection report.

H. REVIEW OF LICENSEE PROCEDURES

The problem of uncertified individuals performing inspections and the inspection reports for those inspections being signed off by a certified inspector was discussed with the CP&L Site Manager and Senior Resident Engineer. They stated that such actions were permissible in accordance with licensee procedure CQA-1, "Personnel Training and Qualification".

A review of that procedure disclosed that Paragraph 7.1 contains the following:

"Emphasis will be on firsthand experience gained through actual performance of processes, tests examinations, and inspections. As the inspector in training develops proficiency, he may be allowed to perform certain functions with minimal supervision; however, he will not be permitted to "sign-off" hold points in verification of quality requirements for work activities."

In response to the Investigator's comments regarding the inspection records being signed by an inspector who had not actually inspected the weld, the licensee's site management representatives stated that the certified inspector was accepting responsibility for the welds, therefore the inspector would only permit the trainees to accomplish the inspection when he believed they were qualified.

The licensee's procedure and implementation of the procedure is inconsistent with the requirements of ANSI N45.2.6-1973 which the licensee committed to follow in that the trainees had not been certified to perform the inspections in question; that is, no "certificate of qualification" meeting the requirements of Section 2.2.4 of the Standard had been completed for the individuals.

The licensee's procedure is also inconsistent with Criterion 17 of Appendix B to 10 CFR 50, which requires that inspection records identify the inspector who performed the inspection. An inspector cannot "accept responsibility" for an inspection that he did not personally perform.

I. FINDINGS

The allegation was substantiated in that the welding inspector signed inspection records indicating that he had inspected welds and found them acceptable when, in fact, he had not personally inspected the welds. This action results in two violations of NRC requirements. These are:

- The inspection records did not identify the individuals (B and C) who had actually performed the inspections as required by 10 CFR 50, Appendix B, Criterion XVII and Section 1.8.5.17 of the PSAR; and
- The inspections were performed by individuals (8 and C) who were not certified to perform the inspections in accordance with ANSI N45.2.6-1973 as required by 10 CFR 50, Appendix B, Criterion II and Section 1.4.9(1.58) of the PSAR.

These violations appear to be the direct result of inadequacies in licensee procedure CQA-1 (Rev. 4), "Personnel Training and Qualification" or the licensee's interpretation of that procedure as discussed in Paragraph H above.