

UNITED STATES NUCLEAR REGULATORY COMMISSION REGION II 101 MARIETTA ST., N.W., SUITE 3100 ATLANTA, GEORGIA 30303

December 2, 1982

TO:

C. E. Alderson, Director, Enforcement and Investigations Staff

FROM:

G. F. Maxwell, Senior Operations Inspector, Harris

SUBJECT: FOLLOW-UP ON TELEPHONE CONVERSATION BETWEEN G.F. ON DECEMBER 1, 1982 AT ABOUT MAXWELL AND! 3 P.M. CONCERNING POSSIBLE HARASSMENT OF A SITE CONSTRUCTION INSPECTOR (CI) BY THE SITE REINFORCING STEEL SUPERINTENDANT

This note is to confirm to you the following, relative to subject telecon:

- While off duty, I found out through casual conversation with a laborer, who is assigned at the Harris site, that a potential existed in which a Cl inspector had been harassed by the reinforcing steel superintendant. On November 30, 1982 I was approached by the concerned CI inspector and set up a time and place to meet with him to inquire as to what had occurred, if anything. The meeting was held on December 1, 1982 just prior to the subject telecon and can be summarized by the following key points, which were relayed to me by the inspector:
- The had been inspecting the Harris site for about, prior to the incident.
- On or about the last week

Ithe inspector was asked to conduct pre-placement inspections in an area where he to conduct these inspections. The superintendant responsible for getting the placements inspected and accepted West

- During three instances that week, insulted the ir spector and insisted that he "sign off" the pre-placements regardless of the conditions as seen by the inspector. ard told that he was immature for enforcing stupid procedural require-
- The inspector informed his immediate supervisors of the occurrences and stated that if something was that he would inform NRC of what had happened. not done with luse required to L Subsequently and was, by his superior.

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* The week following the occurrence the inspector came across and attempted to attain a the inspector, calling him The inspector again reported the incident to his supervision and

- * The inspector stated that he does not feel that any of the inspectors who have been conducting pre-placement inspections have been intimidated by __ito the point that they would let unsatisfactory conditions "slide by." However, he feels that an inspector cannot see everything and that the potential existed in which __ "harrassed" his immediate workers to the point that they would not follow procedures.
- 2. My opinion:
- * The inspector fears permay occur if much is said about the occurrence.
- * acts like a "bully" but in practice is harmless. He has achieved his gains on the site by "bullying" his men to the point that he can get 12 hours of work out of a seven hour day.
- * I do not believe that any of the Cl civil pre-placement inspectors would admit that they let an inspection "slide" because of
- * It's possible that there are things in the procedures which insisted that his men disregard. However, reinforcing steel is being inspected 100% by at least two separate individuals and many times they are audited by QA. This is also true of other pre-placement inspection points.
- * Removal of from the site by CP&L was a very positive indication that management has concern about the treatment of inspectors.
- 3. Recommendation
- * I will, as a part of my routine inspections, lightly inquire about the treatment of other CI inspectors by and will encourage any visiting RII civil inspectors to do the same. If any substantive information is attained, I will contact you immediately.
- * If directed by RII supervision, I will be glad to conduct extensive interviews of craft and/or inspection personnel as required, if you feel that additional information is needed to attain a more assuring confidence level that plant safety has not been jeopardized by

George F. Maxwell

cc: P. Bemis

1. Vorse

L. Williams

Simula. There was a second incident & stationed to the above that was discovered during a Quality assurance audit conducted in sally april 1982. There was a question concerning the whereabouts of the original WDR. A-1-190-1, CT-H-459. It was brought to my attention because I was the lead man in structual welding. I reviewed the copy of the WDR and I poticed the initials did not appear to be those of Mountcastle. I took the WDR and showed M were not his. I told Mr. Front thod the prepare a statement concerning the initials. I also mentioned to Daylow that this was the second incident and he directed me to write a DDR sond begin a review of the files to see if I could find any other firstonces of forsed initials. I conducte the review and found approximately 12. a more aetailed leview was conducted and I believe more than 90% we. actually reviewed. I do not know if other histories were tound 18

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June 4, 1982

MEMORANDUM TO: Mr. G.L. Forehand

FROM: OF .W. Taylor

SUBJECT: Mechanical/Welding Status Report for week of 6/4/22

I. Status of Special Projects & High Priority Work

A. Pipe Hangers

- 1. Bergen-Patterson Skewed "T" Pipe Hanger Shop Welds awaiting management decision on inspection.
- 2. Random inspection of 21 box hangers to verify that FCR H-564 was interpreted correctly by the inspector that performed the initial inspections has been completed. All 21 reinspections were performed and no problems found. Field Inspection Report # W-82-078 has been written and identifies all the hangers that were inspected and accepted.
- 3. Pipe Hanger Group is presently reviewing 1,190 pipe hanger packages to determine which hangers were inaccessible or nard to reach and may have been inspected by uncertified inspectors (K. Stanley and S. Mountcastle). As of this date 644 hanger packages have been evaluated and 304 hangers must be reinspected. 225 hanger packages are missing from the QC Structural files and 321 hanger packages remain to be evaluated. A reinspection has started on 31 hangers as of 6-7-82. 7 hangers were accepted, 20 were found rejectable and 4 hangers did not require reinspection due to prior reinspection as hangers being removed. (Last week's approximation of 1,364 hanger packages has been updated to a more exact figure of 1,190 hanger packages).
- 4. A re-evaluation seems conducted on approximately 3,500 WDR's in the QC Structural Welding files by QC Welding inspectors.

Ine review classified hanger packages into the following three categories:

- a. Category 1- Has approximately 450 pine hanger packages with incomplete WDR documentation.
- Category 2- Has approximately 1,791 packages of hangers reinspections performed by J. Root, or indicated inspected by him.
- c. Category 3- Has approximately 1,800 WDR's in hanger packages that have been evaluated as complete. The hanger packages are presently being reviewed by Structural Welding personnel for accuracy and completeness. As of 6-7-82, 346 hanger packages have been evaluated, i.e. incomplete weld data recorded, material status not verified, etc. 92 WDR's in hanger packages were missing 67 WDR's in hanger packages re uiring inspections of new work. Hanger packages all contain yellowcopy of WDR's with dates ranging from 1-29-81 thru 12-30-81. These hangers were never inspected. 15 hanger packages contained new inspections. Dates on WDR's in these packages are all within a 2 month time span. 42 WDR's in hanger packages were found acceptable and ready for QC Specialist evaluation this week. Those completed WDR's found acceptable by the QC Specialist will be sgined and sent to QA Records Vault. Other WDR's will be indicated as to how much of prior inspection are acceptable and the remaining will be reinspected.

The WDR's found incomplete will be evaluated for completeness of weld inspection. Pipe Hangers that are found to have been partially acceptable will be reinspected in order to complete the inspection of the hanger.

- d. Categories 1 & 2- Evaluations pending completion of evaluation of category 3 pipe hanger packages.
- B. Peden Steel
 - 1. HVAC and Cable Tray Hangers- Reinspection of shop welds
 - a. Reinspection program for all Peden Cable Tray/HVAC hanger shop welds to last up to six months.

 A generic DDR was written on 6-5-82 covering Peden Steel hanger reinspection for the week. 92 hangers were reinspected and 59 hangers were rejected for various reasons. This week reasons for rejection include missing welds, undercut, overlap, etc.

- 2. Approximately 50 for a settation welds at Peden Steel were imposited with 26 welds not showing proper NDE documentation. AS per AS- a full penetration weld requires UT or RT inspection but no record of TDE test being performed on 26 of these welds. These problems are being documented on a new DDR which is presently being written.
- Bill Pere continuing to check Peden inspector's qualifications, Peden welder's qualifications, reviewing Peden specifications, and weld/material inspections.

D. High Stress Stamping

- 1. Inspection of Spool Pieces for High Stress Stamping
 - a. Inspection has begun using new optical aids for closer measurement of the radius of the stamp. Mr. Chiangi loaned us a 7X power glass with which the radius can be approximately measured.
 - b. Spool pieces are now being inspected and measurements documented.
 - c. HPES has sent results of stamp measurements on E & F Center comparitor with .0003R and asked Ebasco if stamp will be acceptable. HPES have also sent mil std. 792C stamp radius and manufacturing standards on stamps to Southwest Fabricators and rasked if their stamps meet these requirements.
- Reactor Main Loop inspected, repaired and Repair Weld Data Reports are ready to be closed. This will be closed this week.

II. QC Structural Welding Subunit

A. Pipe Hangers

- Approximately 250 hangers are backlogged. There are 3 inspectors on this activity.
- 2. Performed visual inspections of 42 pipe hangers.
- 3. Fully accepted 30 pipe hangers.
- 4. Rejected 12 pipe hangers.
- 5. Performed partial inspections of 9 pipe hangers.
- 6. Performed fitup inspections of 6 pipe hangers.

B. HVAC & Cable Tray Hangers

- 1. Approximately 75 hangers are backlogged.
- Only one inspector was available -- we worked with Peden Steel inspectors as well as performed FW inspections.

- 3. Terrormed visual inspections of 10 nangers.
- -. -0 mangers pending material status.
- 5. 60 hangers previously inspected and accepted after material status verification.
- 5. Performed fitup inspections of 20 hangers.
- Permanent Waiver #305 on hanger 6801. CI accepted orientation of hanger, but hanger is not per drawing.
- 8. Field weld WDR's reviewed for completeness. Approximately 200 do not have documentation of configuration or signoff. WDR's were checked accept but there is no signature to verify inspector. (These are old inspections.)

C. Conduit & Buss Duct Hangers

- 1. Approximately 90 hangers are backlogged.
- 2. One inspector is on this activity.
- 3. Performed visual inspections of 24 hangers.
- 4. Fully accepted 22 hangers.
- Rejected 2 hangers.
- 6. Performed partial inspection of 5 hangers

D. Status of Whip Restraints and Tower Restraints in Containment

- Whip Restraints- Presently one inspector setting up a filing system. No inspections requested during week.
- Tower Restraints Presently working in Loops 1 & 2. Regular inspections continuing. One fitup inspection and one preheat inspection performed.

E. Structural Steel Welding Inspections

- 1. Main Steam and Feedwater Penetrations
 - a. The transferring of information from earlier field inspection reports to current WDR's is complete. WDR's were sent to office engineering to facilitate completion of corrective action on DDR 927. A brief meeting was then held with David Bryan of Office Engineering to clarify information of VDR s.

- E. 1. Regular Structural Steel Inspection Activities
 - a. Backlog of inspection of RAB Platform Steel is 92% complete.
 - b. Two personnel presently undergoing OJT for certification.
 - c. Continuing inspections of rework of containment platform steel Backlog of documentation problems, i.e. a) missing WDR's & WP-18's (b) Holdpoints not signed off by inspectors and (c) inaccurate information on WDR's in these areas are continuing to be reviewed.
 - d. Performed regular inspections of HVAC Penetrations
 - e. Performed preliminary inspections of HVAC Penetrations of repaired areas in Reliable Sheet Metal items; Penetrations 133 & 134, in the Sheet Metal Fab Shop. DDR's 820 and 845 were previously written on the items and work is in progress.
 - f. Performed material status verification at Ironworker's Fab Shop.
 - F. Transfer of Field Copies
 - The Structural Weld Inspection group is continuing to transfer original white WDR's to the field and the field's yellow copies to the QC Structural files. This is being done as inspections are required or when identified.
- III. Pipe Welding Inspection Unit
 - A. Reinspection of pipe welds by JIm Root, 19 NCR's being closed. As of 6-3-92, all work completed.
 - B. Fuel Pool and Canal Liners
 - 1. Inspection has been started in the refueling cavity in the Containment Building.
 - 2. Embedded liner plate supports continuing with inspections.
 - 3. Drawing will be used as a weld map and record of weld accepted.
 - 4. Inspection has commenced in Fuel Handling in South New Fuel Pool.
- IV. Significant Events or Evaluation on Areas Planned for the Week
 - A. QC Structural Welding has received trailer for additional work space.

 Trailer to be prepared for six pipe hanger inspectors during the week.

- V . Conditions Which May Have A Significant Effect on Quality or Schedule
 - A. A new procedure has been written for reinspection of Peden Steel Seismic Supports and given to HPES (Jim Nevill) for issuance to Peden Steel.

VI. Personnel Evualuation

- A. Presently, there are 19 Daniel Contract personnel in the QC Welding and Mechanical group.
- B. Total of 17 CP&L inspection personnel. All but 7 are qualified. More OJT time is required but should be qualified by June. They are active in reading, WDR review, fab shop documentation, and inspection of structural steel OJT.
- C. 4 Daniel Contract Personnel passed certification test on Thursday, June 4. Test given by QC Specialist, Brent Firestone.
- D. Two CP&L inspectors reported to work during the week. One trainee reported during the week. Cameron Lucas & Rocklyn Berkheimer. Lisa Robbins, Mechanical Trainee.

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SHEARON HARRIS NUCLEAR POWER PLA

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SHILL DEATH

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ge 85

68/82 upt , veld insp logcalled Gf on 4/18/82 3:15 pm from Steve Mountcastle Pete Tingen
Bill Pere Swit Said he heard that had gone to NEC that () had know ledge that forged initials had been used on Several work and had not done anything about it. Reggide "claimed in TC that he "printed" mittals

Diane + lardy

Sec for Frank Toylor

Pete Tegin - told \$ that used to sign
his name for him

Hen (large man w/beard) reviews WDRs

6.9.82 Frank W. Taylor Dyanne R. Hardy] - clark QA / Harris daily pipe hanger report WDR 3 cy set wh/ yel/ pint wo with letained by QA

who yel went into field w/honger pochage

for wind peink to Mech engineering

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or level phase I and late phase I and

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wo so or while II. and would remain on site

wo so or while job completed. during comparison w/ wht yellow copies several discreponcies were found of weld procedure variances, description of welds and personnel who did the work and or husechion.

alex based on this finding of discrepancies, QA/QC will began to review work in detail. In evidenting discrepancies work was re-inspected. Mech Eng had hanger of week program in tock &1 and would completely audit, inspect houger and lecords, against their copy of houger pochage.

The forework did not match, a complete leinspection of houger puit would be conducted, by QA New system - white my to field and will be completed for early phase I. and placed in vault. Early phase I = hanger up but not but solding drug sipe. War Am seriod.

6.4.82

3 FUT

1. Linger -Suring [OT] (Procedure) field to would turn in chits on fiday Pay along w/field pochoge SAT Am WI would take chit & field pochoop along w/ ruspector Said he would do sopen work would fill out QA/QC WDR except for initials. and place sopen work on desh would initial forms on Monday An way have also initialed some WDR = For anyone else. was doing this during resinspection period WIs were working 10-12 hours per day, 7 days a week. Manut was aware of war work problem but did not respond. Now- it is on- plenty help walable

6.10.82 paperwork for \$ for on ± 3-4 week (4. Sul period. Probably during foll) Remspouring Sep 80 to ± apr 81 (May 81) period (was always at work. S began letting (do his paper work + sometime work around (Dec)
Volunteered to do & poper work right from The Start of reins pection. Sep-Dec & did paperwork hemself from XMAS to Jan () was doing paperwork. (Bopen getting too much OT) I teb on \$ was again doing his popular.

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\$ adv he always completed field copy of WDZ. and that he always had field copy available during his inspections

sossibly was juspecting and it he couldn't actually do nists he may have put someone elses initials to cover himself.



Company Correspondence

March 15, 1982

MEMORANDUM TO: Distribution

MS-9402

SUBJECT: Shearon Harris Nuclear Power Plant Document Sign-Off by Designees

Frequently, it is necessary for a designee to render approval of correspondence, forms, etc. during the absence of the person that has the primary responsibility for approval. In cases where the designee signs a document that calls out the name or position/title of the primary person, the designee should sign or initial, as appropriate, in accordance with one of the following examples (typed portions represent that typical to the document, with A. M. Lucas signing as R. M. Parsons' designee):

In cases where the document does not call out a name or position/title for signoff, the designee should sign without notations being made. Please be reminded, however, that for documents "auditable" under the QA program and which are signed by a designee, the designee's authority is to be established in writing by the person with primary responsibility. The CI unit is maintaining a file of designee memos, so copies should be provided accordingly.

Mr. R. M. Parsons

GMS/bc

cc: Mr. A. Cockerill Mr. G. L. Forehand

Mr. W. E. Seyler Mr. G. M. Simpson Mr. W. D. Gocchan

Mr. M. F. Thompson Mr. R. Hanford Mr. E. E. Willett Mr. E. B. Ison

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| | Fr. 660014 | Class Quan | |
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| erial, Heat or Other Identification No. | | | |
| See Below | N/A | | CPAL PO CTransfe |
| iolation (Specification, Drawing, Proceed | | NCR No. | Reporting Inspector |
| | | N/A | Bill Fere |
| QCI-19.1, Exhibit 4 Jeficiency Details: | | N/A | DDR Evaluation |
| Someone wrote the initials of Steve Moun | | | y Construction Phase |
| on WDR's to indicate rejections or acceptinspectors. *In one case, the inspection indicated a were still rejectable (the defect was weaffected: *A-1-190-1-CT-H-459 A-2-236-1-PD-H-1556 A-6-236-1-PD-H-1702 A-5-236-1-PD-H-1573 A-2-236-1-PD-H-1573 A-2-236-1-PD-H-1577 A-1-190-1-SL-H-731 A-2-236-1-PD-H-1558 A-1-216-1-SW-H-1824 A-1-216-1-SW-H-1826 A-2-236-1-PD-H-1572 | etance of welds to acceptance of weld overlap) WDR | lds that | Engineering Phase QA Program Violation Specification Deviation What Procedural Deviation Unacceptable Workmans Damage/Defect Other Not Reportable* Site QA QA/QC Engr. HPES NI Eval. By - Date *Under evaluation by NFCD. |
| Final Disposition: Verifie Remarks: | Accepted by: | A/QC Inspec | |
| | | A/QC Specia | |
| Distribution: Orig: Director - QA/QC - SHNPP CC: Proj. Gen. Mgr./Sr. Res. Engr. Initiating QA/QC Specialist Associating Mgr E6C QA/QC Mgr RFE8 LA-B Site CA Representative D NSSS Site Representative LACO LA | Author Report Closed: | ized Nuclea | e Section III Items Only): The Inspector Date 91 96 |

naturary to the above, a welding indicator signed inspection records inlisting he had inspected welds and found them acceptable when, in fact, the welds had been inspected by other individuals and he had not personally inspected the welds.

E. 11 SFR 50, Appendix B, Criterion II, as implemented by section 1.4.9 (1.58) if the PSAR requires the licensee to comply with ANSI N45.2.6-1973.

Contrary to the above, the licensee did not comply with section 2.2 of ANSI N45.2.6-1973 in that two individuals performed weld inspections perfore they were certified by the licensee as being qualified to perform the assigned work.

Denial or Admission and Reasons for Violations:

* the seed the individual.

A. The violation is correct as stated. The inspector in question (Inspector A) when questioned, admitted that he did not reinspect each weld inspected by trainees under his supervision. The inspector further stated that he had worked with the trainees and had reinspected their work until he was satisfied that they were capable of performing the inspections satisfactorily. He admitted that he signed inspection records for which the trainees had actually performed the inspections, but stated he was confident that the inspections were performed correctly. He felt there was nothing wrong with him signing the inspection records since the trainees were under his supervision.

Further investigation revealed that Inspector A, while in the process of reviewing daily weld inspection records for seismic pipe hangers, had routinely taken it upon himself to print the inspector's initials on the record when the inspector who had performed the inspection had failed to do so. Inspector A readily admitted this, on a one case basis, when confronted with a weld inspection record on which the inspector's initials were questionable. He later admitted to having done this routinely when several additional examples were found. He stated that he saw nothing wrong with this practice since he knew which inspectors had actually performed the inspections. He further stated that he had not intended to forge the initials, but merely indicate who had done the inspection. He indicated that he intended to get the appropriate inspectors to initial the records later, but just hadn't found time to do it. Investigation found that the various initials allegedly printed by Inspector A have little resemblence to initials written by the inspectors in question. At this point in our investigation, Inspector A left CP&L employment for a position elsewhere.)

-continued-

Having determined that Inspection A har, at least, used this conservation his handling of trainees' inspections and using other inspections' initials on records, a detailed review of all seismic pipe hanger well records. This processed by Inspector A was conducted. Findings are as follows:

- Inspector A inserted initials of other inspectors on WDR's (a total of 12 WDR's).
- Inspector A inserted his own initials on WDR's for hanger welds which had been inspected by other inspectors and trainees.
- Inspector A indicated acceptance of hanger welds on WDR's by inserting another inspector's initials for welds which had been previously rejected by that inspector without evidence of rework and reinspection (1 WDR).
- B. The violation is admitted with the following clarification:

The two individuals in question (Inspector B and Inspector C) did, in fact, perform weld inspections prior to being certified as being qualified to perform that function. However, these inspections were performed under the direct supervision of a qualified inspector (Inspector A) who maintained himself in the immediate vicinity and who assumed responsibility for the inspections by affixing his own initials on the weld inspection reports.

Site QA procedure CQA-1, Personnel Training and Qualification, paragraph 7.1 states in part: "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 holdpoints in verification of quality requirements for work activities." CP&L investigation into this matter clearly indicates that inspectors A, B and C, in their respective roles, felt they were in full compliance with procedure requirements.

Corrective Steps Taken and Results Achieved:

- A. In the case of the stated violation which involved Inspector A indicating he had inspected welds when, in fact, the welds had been inspected by other individuals trainees under his supervision), corrective action is as described for item B below. Corrective action for the additional findings of our investigation are as follows:
 - 1. Where Inspector A inserted the initials of other inspectors:
 - (a) The inspection was verified by the inspector's initials on either the working copy of the WDF or the Inspection Request form for 5 of the 12 AUR's in question. The appropriate inspector initialled and dated the WDR.

- ty the working copy of the WIR or the Inspection recommendation form will be reinspected and a new WIR generated.
- Where Inspector A inserted his own initials for inspections performed by other inspectors:
 - (a) If the inspector is still on the job and his inspection can be verified by his initials on the working copy of the WDR or the Inspection Request form, the inspector will initial and date the WDR.
 - (5) If the inspector is no longer on the job or his inspection cannot be verified by the working copy of the WDR or the Inspection Request form, the hanger will be reinspected and a new WDR generated.
- 3. Where Inspector A indicated acceptance of welds by inserting the initials of another inspector for welds previously rejected by that inspector (no evidence of rework and reinspection):

Hanger was reinspected and rejected pending rework. Appropriate entries were made on the WDR.

B. CP&L was able to verify that Inspector A had not reinspected each weld inspected by Inspectors B & C while in trainee status. We have determined that Inspector B was a trainee under Inspector A from October 13, 1980 to February 17, 1981 and that Inspector C was a trainee under Inspector A from September 8, 1981 to November 16, 1981.

We have identified those hangers "signed off" by Inspector A during those periods which, by virtue of location or interference, would have been difficult to inspect (approximately 200 hangers) and are in the process of reinspecting the field welds. Weld deficiencies found will be handled as nonconformances. This effort is expected to be complete by August 1, 1981.

Corrective Steps Taken to Avoid Further Noncompliance:

- A. Inspection personnel have been reinstructed in the seriousness of signing or initialling for work not performed by themselves and for the use of another inspector's name or initials on inspection records.
- B. Procedure CQA-1, paragraph 7.1 has been revised, in part, to read:

 "As the inspector in training develops proficiency, he may be allowed to perform certain inspection functions under the supervision of a qualified inspector; however, the qualified inspector is responsible for reinspection to the extent necessary to verify the accuracy of the trainee's inspection". This procedure revision is in the review process and is expected to be issued by dune 1, 1982. Inspection personnel have been reinstructed as to their responsibilities relative to reinspecting work done by trainees prior to "signing-off".

Date When Full Communication Will Be Addition

- A. Full compliance will be achieved by September 1. . .
- B. Full compliance will be achieved by August 1, 1981

Note: There are two minor errors in IE Report No. 50--00/82-03 and 50-401/82-03:

- On page I-2 of the report under <u>CONCLUSIONS</u>: Item I should read "uncertified <u>welding</u> inspectors" rather than "uncertified welders".
- On page II-2 of the DETAILS OF INVESTIGATION:
 B. L. Holcombe is not a Welding Engineer. He is a Welding Supervisor.