



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

Report Nos.: 50-424/84-05 and 50-425/84-05

Licensee: Georgia Power Company  
 P. O. Box 4545  
 Atlanta, GA 30302

Docket Nos.: 50-424 and 50-425

License Nos.: CPPR-108 and CPPR-109

Facility Name: Vogtle

Inspection at Vogtle site near Waynesboro, Georgia

Inspector: J. J. Blake 6/8/84  
 E. H. Girard Date Signed

Approved by: J. J. Blake 6/8/84  
 J. J. Blake, Section Chief Date Signed  
 Engineering Program Branch  
 Division of Engineering and Operational Programs

SUMMARY

Inspection on February 21 - 24, 1984

Areas Inspected

This routine, unannounced inspection involved 36 inspector-hours on site in the areas of licensee action on previous enforcement matters and followup on NRC investigation of QC welding and inspection concerns in Pullman Power Products, Inc., activities.

Results

No violations or deviations were identified.

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## REPORT DETAILS

### 1. Persons Contacted

#### Licensee Employees

- \*W. T. Nickerson, Deputy General Manager
- \*M. H. Googe, Assistant Project Construction Manager
- \*E. D. Groover, QA Site Manager

Other licensee employees contacted included QC inspectors and supervisors, construction supervisors, QA Engineers, and ASME Authorized Nuclear Inspectors.

#### Other Organization

J. P. Runyan, QA Manager, Pullman Power Products

#### NRC Resident Inspector

- \*W. F. Sanders

\*Attended exit interview

### 2. Exit Interview

The inspection scope and findings were summarized on February 24, 1984, with those persons indicated in paragraph 1 above. The licensee was informed of the inspection findings listed below. The licensee did not state any dissent with regard to the findings except that they indicated a strong objection to delay between Region II's completion of their investigation of allegations (described herein) against their contractor and their being notified of the findings.

Unresolved Item 424,425/84-05-01, Insufficient Organizational Freedom/Control of Services Through Effective QA Audits, paragraph 5.b(1)

Inspector Followup Item 424, 425/84-05-02, Unsatisfactory Piping Welds from the Pullman Fabrication Shop, paragraph 5.b(2)

Inspector Followup Item 424, 425/84-05-03, Storage and Protection Deficiencies, paragraph 5.b(4)

Inspector Followup Item 424, 425/84-05-04, Licensee Review of Charges of Fraudulent Welding Inspection Verification, paragraph 5.b(6)

Inspector Followup Item 424, 425/84-05-05, Adequacy of Training Program for Inspectors, Field Engineers, and Craft, paragraph 5.b(8)

Inspector Followup Item 424, 425/84-05-06, Controls on Foreign Materials in Piping, paragraph 5.b(11)

Inspector Followup Item 424, 425/84-05-07, Pipe Improperly Sand Blasted, paragraph 5.b(13)

Inspector Followup Item 424, 425/84-05-08, Control of Nonconformance Reports, paragraph 5.b(3)

Inspector Followup Item 424, 425/84-05-09, Clarifications of Engineering and Procedural Requirements, paragraph 5.b(1)

Inspector Followup Item 424, 425/84-05-10, NF Boundary, paragraph 5.b(15)

Inspector Followup Item 424, 425/84-05-11, Welding Material Controls, paragraph 5.b(15)

Inspector Followup Item 424, 425/84-05-12, Weld Symbols, paragraph 5.b(15)

Inspector Followup Item 424, 425/84-05-13, Unqualified Welding Procedures, paragraph 5.b(15)

3. Licensee Action on Previous Enforcement Matters

- a. (Closed) Unresolved Item (424, 425/83-01-01): Spare Penetration Closure. This item was opened to identify a concern that the non-destructive examination specified for flat plate closures on spare containment penetrations was not adequate. The inspector reviewed the design and examination specified and is satisfied that they are in accordance with the requirements of the applicable Code and are adequate. The matter is considered closed.
- b. (Open) Unresolved Item (424, 425/83-10-01): RHR Pumps Transition Surfaces. This item identifies a concern regarding the sharpness of the transition of grooves machined into the inlet and discharge nozzles of residual heat removal (RHR) pumps. The licensee stated that they had received additional information relative to this matter from the pump manufacturer but that they had not completed their review of it and were not prepared to provide it to the inspector at this time. This item will remain open pending NRC review of additional information to be provided by the licensee for review in a subsequent inspection.

## 4. Unresolved Items

Unresolved items are matters about which more information is required to determine whether they are acceptable or may involve violations or deviations. New unresolved items identified during this inspection are discussed in paragraph 5.b(1).

## 5. Followup on NRC Investigation of Alleged Intimidation/Harassment of QC Welding Inspectors and Possible Falsification of QC Inspection Records by Pullman Power Products, Inc.

Reference: (1) Memorandum from A. R. Herdt (NRC Region II) to B. Uryc (NRC Region II), entitled Technical Review of Investigation Report, dated January 11, 1984.

NOTE: A copy of this memo is included as an attachment to this report.

## a. Introduction and Summary

The inspector conducted a followup inspection into concerns that were previously investigated or identified in the course of a formal NRC investigation. That investigation is described in a NRC Office of Investigation report which has not been made public. The investigation addressed a number of concerns that had been reported to NRC Region II regarding the activities of the licensee's piping and piping support contractor, Pullman Power Products, Inc., (PPP). Of major interest were concerns that there had been intimidation/harassment of QC inspectors and falsification of QC inspection records. Although the investigation report was not made public, licensee and contractor management became aware of the more significant concerns through questions asked in interviews conducted during the investigation and through discussions with NRC Region II management in a meeting held June 24, 1984.

The followup conducted by the NRC inspector during this inspection was intended to:

- (1) Assure that the licensee clearly understood the original concerns
- (2) Examine the effectiveness of such corrective actions as the licensee may have taken in response to the concerns
- (3) Obtain additional information to better define and determine the significance of the concerns
- (4) Determine the licensee's compliance with regulatory requirements, identifying any necessary enforcement actions
- (5) Identify any concerns that require additional followup in NRC inspections

As a result of the inspection the inspector identified one unresolved item based on the concern that there had been harassment and intimidation of contractor QA inspectors. In addition, the inspector identified twelve other concerns or issues to be resolved through followup in subsequent NRC inspections.

b. Inspection

The inspector conducted the inspection through a review of documentation and through interviews - principally with PPP QC personnel. At the beginning of the inspection, the inspector provided the licensee with a listing of the concerns (Ref. 1) that had been identified from the NRC investigation, and requested that the licensee provide him with any information that they had relative to the concerns, to specifically include:

- The Georgia Power Company (GPC) 1982 Self Initiated Evaluation Using INPO Criteria
- GPC documentation of deficiencies found in piping and supports fabricated by the PPP Williamsport Fabrication Shop
- Documentation related to GPC's investigation of charges of PPP management harassment and intimidation of QC inspectors

The licensee was not able to provide any of the requested documents to the inspector; however, the inspector did review a draft copy of a report of a related investigation that had been conducted by the licensee.

The licensee investigation report and the referenced list of concerns derived from NRC investigation report referred to previously were the documentation utilized by the inspector in his inspection. Personnel interviews were a primary source of information for the licensee's report and were the principal source of information for the NRC investigation. Over 40 individuals were interviewed in the NRC investigation, of which 21 were PPP QC personnel. For their investigation the licensee interviewed 64 individuals, of which 11 were PPP QC personnel.

For his followup of the original NRC investigation the inspector interviewed 18 individuals who had direct knowledge of the PPP QC inspection work. Of these, 14 were PPP QC personnel. Approximately half of the 14 had been interviewed in the original NRC investigation.

The concerns inspected and the inspectors findings are described and discussed below:

(1) CONCERN

PPP management harassed and intimidated QC personnel such that there was insufficient organizational freedom in the quality control organization to assure proper accomplishment of its quality functions.

DISCUSSION

(a) NRC Investigation Review

The NRC investigation concluded that intimidation and harassment had occurred. This conclusion was based on the following:

- All but one of the field QC inspectors interviewed reported variously that the PPP Project Manager, (also referred to as the resident construction manager) had attempted to influence the utilization of, and decisions rendered by, QC inspectors; that the salary administration and other benefits for QC personnel controlled by the Project Manager were unfair and inequitable; that he arbitrarily adjusted recommended salary increases based on subjective criteria; that he was frequently publicly non-supportive and negative towards the QC function; that he and construction superintendents publicly chastised and embarrassed QC inspectors; and that he employed remarks which threatened job security as a means of intimidation and harassment.
- A review of the PPP field organizational structure identified the QA organization (including QC) as reporting to the Project Manager administratively. This permitted the Project Manager to act to control salaries and otherwise influence the QC inspectors.
- A review of recent salary increases for QC inspectors indicated that increases recommended by the QA manager for the inspectors had been reduced by the Project Manager in an apparently arbitrary manner. In an interview the Project Manager agreed that some of the changes were made arbitrarily and that in some cases favoritism, such as long standing friendships and social acquaintances, played a role in the amount of annual salary increase that he approved for particular employees.

Note. The Project Manager categorically denied that he used salary to gain control of the QA/QC function.

It appears that the actions taken by PPP management, as described above, indicate a violation of the requirements of 10 CFR 50, Appendix B, Criterion 1. However, PPP is a contractor to Georgia Power Company who is the constructor as well as the licensee for this plant. The inspector was not able to establish what actions required of Georgia Power Company by 10 CFR 50 Appendix B, Criterion VII and XVIII should have either precluded the problems or have discovered and corrected them. Pending development of what Georgia Power Company's responsibilities were, this item will be identified as Unresolved Item 424,425/84-05-01, Insufficient Organizational Freedom/Control of Services Through Effective QA Audits.

(b) Licensee Investigation Review

The licensee's investigation revealed no evidence of harassment or intimidation of QC inspectors. It noted that "although the question of intimidation was not asked specifically, there was opportunity for the inspection personnel to appraise the interviewers, had such a problem existed."

(c) Interviews

The inspector's interviews during this inspection revealed that the Project Manager had been replaced, apparently in response to concerns raised in the original NRC investigation, and that QC inspection personnel generally no longer felt intimidated or harassed by the Project Manager or other craft supervisors or personnel. The inspector noted some indication of a continued concern from some individuals that there was improper interference in the QC inspection process - principally pressures from their own (QC) management. Several individuals specifically noted that pressures were applied to hurry and accept items when procedural requirements were unclear. Apparently related to this was a concern expressed that QC procedural requirements (inspection technique and acceptance limits) and drawing requirements were being changed or altered through verbal instructions (primarily) and memos; that these verbal instructions and memos sometimes appeared incorrect and were sometimes contradictory; and that there was no apparent satisfactory means for getting clearly authoritative answers to questions of procedural or drawing interpretation.

The concern, described above, that there may be continued interference in the QC inspection process will be addressed by Region II in an inspection of the unresolved item identified above. The inspector was not able, based on the information obtained in the interviews, to clearly determine whether the charge of continued interference had any validity or if there was simply resentment of what could be considered the normal pressures that supervision exercises to assure that work progresses in an efficient but acceptable manner. The concern with regard to use of verbal instructions and memos appears to be, at least in part, noted in the licensee's investigation report. The inspector, from comments in one interview, understands that the licensee has or will be taking actions relative to this concern. The inspector identified this concern as inspector followup item 424, 425/83-05-09. Clarifications of Engineering and Procedural Requirements. The licensee's actions relative to this concern and the significance of the concern will be examined further by Region II in subsequent inspection of the inspector followup item.

The inspector questioned the QC personnel as to whether they believed that any significant hardware deficiencies, that might have stemmed from harassment and intimidation by previous management, remained unaddressed. Only one individual felt that there might be such significant unaddressed deficiencies - he indicated a specific concern for welds in piping fabricated at the PPP Williamsport Fab Shop. The specific concern for unidentified deficiencies in piping from the PPP Williamsport Shop will be dealt with as described in (2) below.

#### FINDINGS

The original concern was substantiated and, in response, an unresolved item was identified as described above. In addition, a new concern as also indicated which was identified as an inspector followup item, for examination in a future inspection.

#### (2) CONCERN

Unsatisfactory welds in piping and supports fabricated at the PPP fabrication shop in Williamsport, Pennsylvania have been accepted by shop and site QC.



## DISCUSSION

## (a) NRC Investigation Review

The investigation report indicates that two interviewees stated that there were unacceptable welds in piping and supports, as described above, and that, although the licensee had been informed of the problem, no corrective action was being taken.

## (b) Licensee Investigation Review

This problem was not addressed.

## (c) Interviews

Prior to the inspection the inspector had noted that the licensee had reported weld deficiencies in piping from the PPP Williamsport shop to the NRC (in accordance with 10 CFR 50.55(e)) on two occasions - on November 11, 1982 and October 21, 1983. The inspector surmised, therefore, that the investigation interviewees who originally noted the above problem may not have been aware that the licensee knew of the problem and was already taking corrective action. To determine whether this was the case the individuals interviewed during this inspection were asked if they were aware of the licensee's identification and correction of the deficiencies. All but one of the interviewees indicated they either had no knowledge of the problem or that they believed adequate corrective action had been instituted. The one individual indicated he knew of piping welds that remained deficient and that he would identify them (he had not provided the identification by the end of the inspection). The inspector informed the licensee that this concern would be identified as inspector followup item 424, 425/84-05-02, Unsatisfactory Piping Welds From the Pullman Fabrication Shop. This item will be examined by Region II in subsequent inspection addressing the 10 CFR 50.55(e) item CDR 83-51. Personnel interviewed indicated that they knew of no support welds from the PPP Williamsport Shop. Also, several of the individuals interviewed stated that the defects that had been detected in the piping welds had generally been minor and of little significance.

## FINDINGS

A limited concern remains, based on the contention of one interviewee that some deficient welds went uncorrected. The inspector identified this as an item for further follow-up as described above.

## (3) CONCERN

PPP site QC inspectors who attempted to reject unacceptable welds noted in piping and supports fabricated by the PPP Fabrication Shop were informed that it was not their job to report these non-conforming conditions. This indicates possible excessive restriction on the freedom of inspectors to identify safety concerns.

## (a) NRC Investigation Review

The inspector found that this concern was directly related to the concern described in (2) above, in that it was the deficient PPP Shop piping welds referred to in (2) that individuals reported that they had been told to ignore.

## (b) Licensee Investigation Review

This problem was not addressed by the investigation.

## (c) Interviews

As stated for (2) above, all but one interviewee indicated that they either had no knowledge of the piping deficiencies or that they believed that adequate corrective action had been taken. The one individual believed that some deficient welds had not been addressed. The inspector specifically questioned the QC interviewees as to whether any restriction was placed on them relative to identification of safety concerns. All indicated they had no restriction placed on them. However, several individuals indicated concerns about the handling of nonconformance reports (NCRs). Specific problems noted included

- Voiding of NCRs without feedback to the originators (Copies of the NCRs, even if voided, are retained)
- Rewriting of NCRs without feedback to the originator, some conditions were stated to have been improperly described when rewritten
- Writing NCRs in individuals names without informing them of the NCRs. (When an individual asks about an apparent problem an NCR may be written in his name without telling him.)

It was not clear whether this had resulted in any safety-significant problems, but it appeared to be a potential

problem. PPP supervisory personnel who were interviewed indicated they were aware of these problems and were taking steps to correct them. The inspector identified concerns relative to the handling of NCRs as inspector followup item 424, 425/84-05-08, Control of Nonconformance Reports.

#### FINDINGS

The inspector found no evidence of any restrictions on individuals freedom to identify safety concerns. It appeared that the concern was really that addressed in (2) above. However, a concern for the control of nonconformance reports was described to the inspector and was identified by the inspector as an item for followup in subsequent inspection.

#### (4) CONCERN

PPP failed to correct repeatedly identified material storage deficiencies.

#### DISCUSSION

##### (a) NRC Investigation Review

Several individuals interviewed in the investigation expressed concern that repeatedly identified storage deficiencies had not been corrected.

##### (b) Licensee Investigation Review

The concern was not addressed by the licensee's investigation.

##### (c) Interviews

The inspector questioned the individuals interviewed as to their general knowledge of present and past storage deficiencies, including the safety significance of the deficiencies and whether they remained uncorrected. The inspector indicated to the interviewees that he would consider storage deficiencies that could result in serious damage to materials or equipment or that might result in a loss of traceability to be significant, whereas he would consider not properly placing materials on dunnage, possibly resulting in minor scratches, to not be significant. Most of the individuals questioned indicated that they knew of past and continually repeated storage deficiencies. With the exception of one individual questioned, the interviewees indicated that the storage deficiencies were not significant. Examples of

concerns that the one individual expressed included unprotected flange surfaces and a spillage of acid that went into floor drains. Supervisory personnel interviewed indicated their knowledge of continued problems with storage deficiencies and stated that further steps were being taken to correct the deficiencies. With the exception of the alleged acid spillage into floor drains the inspector did not hear of any storage deficiencies that he would consider especially serious. The inspector does consider, however, that the licensee's storage and protection practices warrant further inspection to assure their adequacy and the inspector identified this inspector followup item 424, 425/84-05-03, Storage and Protection Deficiencies. A related matter described in (5)(a) below will be examined as part of this item.

#### FINDINGS

Responses from interviewees indicate that the concern may be substantiated but that the storage deficiencies probably have limited safety significance. It was determined that the concern was sufficient to warrant further followup and that it should be expanded to consider protection of materials and equipment.

NOTE: Considering the areas addressed by the individuals expressing the original concerns and based on discussions held during this inspection, it appeared that the original and continuing concerns for storage and protection were directed to simple materials and components - principally piping and hangers.

#### (5) CONCERN

A PPP QC inspector allegedly fraudulently verified correction of storage deficiencies on a Storage Inspection Report. This action was alleged to a named individual.

#### DISCUSSION

##### (a) NRC Investigation Review

Several individuals questioned in the investigation indicated that two named individuals fraudulently verified correction of storage deficiencies described on a Storage Inspection Report. Other individuals indicated that they thought that the reported deficiencies might have been corrected and then recurred.

(b) Licensee Investigation Review

The concern was not addressed by the licensee's review.

(c) Interviews

The individuals interviewed by the inspector indicated that the storage deficiencies referred to in the subject Storage Inspection Report were not serious or damaging. Also, it appeared that the concerns for possible fraudulent verification raised in the investigation had emphasized the concern for fraudulent signoffs and that it was very unlikely to recur if it truly ever had occurred.

FINDINGS

The concern was not proven. The inspector concluded that it did not warrant further inspection or review.

(6) CONCERN

Two named PPP QC welding inspectors allegedly fraudulently signed for inspections that were not performed.

DISCUSSION

(a) NRC Investigation Review

The investigation report disclosed that several individuals (some on the basis of hearsay) believed that two named QC welding inspectors had bypassed some required welding inspections. The inspectors charged were interviewed and denied the charge. Based on the evidence obtained in the investigation, it was the conclusion of the investigation that the charges were not proven.

(b) Licensee Investigation Review

The concern was not directly addressed by the licensee's review.

(c) Interviews

The NRC inspector questioned most of the individuals interviewed to determine if they knew of the alleged fraudulent signoffs, if they believed that the signoffs resulted in acceptance of unacceptable welds, and if they believed that the practice had continued. Many of the interviewees were aware of the allegation - primary from rumors or from questions asked in the previous NRC investigation. None of the interviewees indicated any knowledge of unacceptable welds

that had resulted from the alleged fraudulent signoffs. Several upper level QC supervisors interviewed identified the individuals who had allegedly made the fraudulent signoffs and stated that the welds inspected by the two had been rechecked because of the charges, and that no significant problems had been found. None of the interviewees indicated any knowledge of any continuation of fraudulent signoffs and several stated their belief that if the practice or other unacceptable inspection practices had occurred, the concerns expressed (resulting from the investigation) would assure against any recurrence. The NRC inspector informed the licensee that Region II would review their reinspection results for the work of the QC inspectors who were the subjects of the concern. The NRC inspector identified followup on this matter as inspector followup item 424, 425/84-05-04, Licensee Review of Charges of Fraudulent Welding Inspection Verifications.

#### FINDINGS

The concern was not substantiated but does appear to warrant further followup by Region II in verifying licensee reinspection results. Region II's verification will be undertaken in a subsequent inspection addressing the inspector followup item identified above.

#### (7) CONCERN

A named PPP QC inspector failed to comply with visual inspection procedure maximum inspection distance limits.

#### DISCUSSION

##### (a) NRC Investigation Review

The NRC inspector's review of the investigation findings found that this concern is very closely related to that described in (6) above. His review disclosed that several interviewees named one of the individuals charged in (6) as the inspector who failed to comply with inspection distance limits. The inspector also noted that one interviewee stated that he had heard that the other had performed inspections from an excessive (unacceptable) distance. Both individuals charged were interviewed and one categorically denied the charge. The other explained that because of his large size he had not been able to achieve the required distance limitations in some instances, but that he had used inspection aides (a flashlight and magnification mirror) to assure adequate inspection.

## (b) Licensee Investigation Review

The licensee's review did not address this concern.

## (c) Interviews

As stated in (6)c above, QC supervisors informed the NRC inspector that both of these individuals work had been reinspected and that no significant problems had been found. The reinspection will be reviewed by Region II in subsequent inspection addressing inspector followup item 424, 425/84-05-04, Licensee Review of Charges of Fraudulent Welding Inspection Verifications.

## FINDINGS

Same as for (6) above.

## (8) CONCERN

The PPP training program for welding inspectors and welders is inadequate.

## DISCUSSION

## (a) NRC Investigation Review

The inspector found that several interviewees expressed general concerns regarding the adequacy of training for QC inspection and craft personnel.

## (b) Licensee Investigation Review

The inspector found that the licensee's investigation made several observations and recommendations with regard to this area. The licensee's action on the recommendations will be followed by Region II relative to continuing concerns relative to training as described in (c) below.

## (c) Interviews

The inspector questioned most interviewees with regard to the adequacy of the licensee's training for QC inspectors and craft personnel. Generally, the interviewees noted considerable recent improvement in the training of QC inspectors and most thought that it was satisfactory. There appeared to be more concern for the adequacy of craft training. The adequacy of welder qualifications was not mentioned as a concern by any of the interviewees. Specific concerns noted relative to training included:

- Craft personnel do not have adequate training relative to procedures, reading drawings and weld symbols and rely on QC to identify and explain requirements.

NOTE: The licensee's investigation recommended better training of craft personnel relative to procedural and drawing requirements.

- Field engineers are not knowledgeable and often rely on QC inspectors to clarify requirements.

NOTE: The licensee's investigation recommended that field engineers receive technical training and possess knowledge equivalent to the QC inspectors, and that it be the field engineers who provide guidance to the craft rather than QC inspectors.

- Clarifications and changes to requirements are not communicated well. B and C shifts and craft personnel generally are slow to be appraised of procedural changes.

NOTE: The licensee's investigation recommended that methods used to distribute technical information to the craft to ensure proper dissemination of technical requirements should be reviewed and corrected.

No clear violations of regulations or commitments were described to the inspector in the interviews. Most, if not all, of the concerns described to the inspector in the interviews had already been addressed in the licensee's investigation recommendations. The inspector informed the licensee that Region II would examine the adequacy of their actions relative to the concerns in this area in subsequent inspection and identified this matter as inspector followup item 424, 425/84-05-05, Adequacy of Training Program for Inspectors, Field Engineers, and Craft.

#### FINDINGS

The inspector concluded that there was some basis for the subject concern. It was not clearly evident that any regulations or commitments were being violated. The concern was determined to warrant further review and the inspector followup item described above was identified to address the matter.



(9) CONCERN

Some PPP records, specifically storage inspection reports are missing.

DISCUSSION

(a) NRC Investigation Review

The inspector found that only one individual reported this concern and that he reported only for one report. This report would, from its description, be considered a minor record of very limited significance.

(b) Licensee Investigation Review

The licensee's investigation noted no concerns that appeared related to this concern.

(c) Interviews

This matter appeared to have very limited significance and was not directly discussed with any interviewees. However, the inspector did discuss the performance of storage inspections, and preparation of reports thereof, with several interviewees. None of the interviewees indicated any concern for missing reports. However, one individual stated that storage inspections and reports were not being prepared for B shift. Other individuals questioned disputed this claim. The inspector considers the concern for missing reports and for possible lack of B shift storage inspections unlikely to be significant problems. However, these concerns will be addressed in subsequent inspections directed to inspector followup item 424, 425/84-05-03, as described in (4) above.

FINDINGS

The original concern was not confirmed. It and another concern described above appear to have only limited significance even if proven. Both concerns will be examined further in conjunction with a previously identified inspector followup item as described above.

## (10) CONCERN

Socket welds may have been improperly performed.

## DISCUSSION

## (a) NRC Investigation Review

The inspector found that the source of this concern was one individual. No details were described by this individual.

## (b) Licensee Investigation Review

This concern was not addressed.

## (c) Interviews

The inspector questioned all of the QC personnel interviewed and the individual who originally reported the concern as to their knowledge of socket welding problems. Problems with undersize welds were mentioned by some of the interviewees. All stated they knew of no problems that had not been identified and addressed.

## FINDINGS

The concern was substantiated, in part. There had been a problem with undersize socket welds. However this problem appears to have been adequately identified and addressed by the licensee. No further investigation appears to be warranted.

## (11) CONCERN

Rags and paper towels placed in piping as purge dams may have been left there after welding.

## DISCUSSION

## (a) NRC Investigation Review

The inspector found that one individual had identified this concern during the investigation. He did not provide any significant details relative to the concern beyond those described in the concern statement above.

## (b) Licensee Investigation Review

This was not addressed in the licensee's investigation.

## (c) Interviews

The QC personnel interviewed were questioned as to their knowledge of this concern. A number of the individuals stated that they were aware of a specific problem that had been identified and was being addressed—control of purge dams. A few individuals expressed concerns that the importance of checking pipe for foreign materials as it was being installed had not been adequately emphasized to QC inspectors and, that some piping, notably floor drains, was now contaminated with foreign materials. Interviewees informed the inspector that the floor drain problem had been identified and was being addressed. The inspector concluded that the concern relative to this area warranted additional followup. The inspector identified this concern for followup in subsequent Region II inspection as inspector followup item 424, 425/84-05-06, Controls on Foreign Materials in Piping.

## FINDINGS

The concern was, in part, confirmed. As it appeared that the licensee had identified the problem and might be adequately addressing it, it was identified only as an inspector followup item, as described above.

## (12) CONCERN

PPP does not post documents as required by 10 CFR 21.

## DISCUSSION

## (a) NRC Investigation Review

The investigation reported that two QC personnel stated their belief that posting per 10 CFR 21 was not provided for PPP (site) personnel.

## (b) Licensee Investigation Review

The licensee's investigation did not address this concern.

## (c) Interviews

The inspector questioned all QC personnel as to whether they had seen posting in PPP areas as required by 10 CFR 21. Several individuals were not sure but the majority stated they had seen the posting. One individual stated that he had seen it posted since he came (over five years). The individuals who had originally expressed the concern were

questioned and indicated they were not sure whether the posting had been there. (The inspector verified the posting at a PPP QC office early in the inspection.)

#### FINDINGS

The concern was not substantiated. No followup action is required.

#### (13) CONCERN

Pipe was improperly sand blasted resulting in this areas. This was due to inexperienced sand blasters.

#### DISCUSSION

##### (a) NRC Investigation Review

The inspector found that one of the individuals questioned expressed a concern for improperly sand blasted pipe and the qualifications of the sand blasters. The individual stated that he believed that the licensee had identified the problem.

##### (b) Licensee Investigation Review

This concern was not addressed by the licensee in their investigation.

##### (c) Interviews

The inspector questioned the QC personnel interviewed regarding their knowledge of this problem. Several individuals knew of the problem and indicated that corrective action had been taken. One individual expressed a concern that a piece or two of bad pipe might not have been caught in the checks that had been undertaken. The inspector informed the licensee that their actions in addressing sand blasting problems would be examined in a subsequent inspection. The matter was identified for followup as inspector followup item 424, 425/84-05-07, Pipe Improperly Sand Blasted.

#### FINDINGS

The concern was substantiated. The problem had been identified and acted on by the licensee. The licensee's corrective action was determined to warrant followup for review of its adequacy.

## (14) CONCERN

The PPP QA/QC Manager does not have adequate authority to obtain corrective actions for continued non-conformances, such as storage deficiencies.

NOTE: This is closely related to (1) above.

## DISCUSSION

## (a) NRC Investigation Review

The inspector found that this concern was expressed by a number of the QC personnel interviewed during the investigation. Further, stated inability to correct storage deficiencies tended to confirm this concern. The lack of authority appeared to be due in large part to the Project Manager's administrative authority over all QA personnel and his exercise of that authority.

## (b) Licensee Investigation Review

The inspector found no significant information related to this matter in the licensee's investigation report.

## (c) Interviews

The inspector questioned the interviewees as to whether they believed the PPP QA/QC Manager now had sufficient authority. Most of the individuals interviewed stated that they now believed the QA/QC manager had adequate authority over activities undertaken by PPP - now that the PPP Project Manager had been replaced (as noted in (1) above). It was stated that PPP did not perform storage activities (except inspection) any longer and that corrective action in that area was difficult to obtain. Some individuals questioned stated they were still concerned that the QA/QC Manager did not have adequate authority based on their observation (as noted in (1)(c) above) that there still appeared to be improper interference in the QC process.

This concern is closely related to (1) above and will be examined further in Region II's review and inspection of the unresolved item violation 424, 425/84-05-01, described in (1).

## FINDINGS

The original concern appears to be confirmed with the confirmation of concern (1) above. Assurance that the QA Manager's authority is now adequate will be addressed through the unresolved item described in (1).

(15) MISCELLANEOUS CONCERNS IDENTIFIED DURING THE INTERVIEWS CONDUCTED IN THIS INSPECTION

Four new concerns were related to the inspector by individuals interviewed:

- The licensee's definition of the ASME Section III, NF piping support boundary appears improper
- There were frequent errors or omissions in welding material issue records - specifically in recording quantities returned
- There appeared to be nonstandardized use of weld symbols on drawings
- Unqualified welding procedures may have been used

The above items were identified for followup in subsequent inspections as inspector followup items

424, 425/84-05-10, NF Boundary  
424, 425/84-05-11, Welding Material Controls  
424, 425/84-05-12, Weld Symbols  
424, 425/84-05-13, Unqualified Welding Procedures