

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In Re: :  
DUKE POWER COMPANY, Et Al. : DOCKET NUMBERS  
(Catawba Nuclear Station : 50-413  
Units 1 and 2) : 50-414  
-----

May 19, 1983  
10:00 A.M.

Volume I

DEPOSITION OF:

PETER K. VANDOORN

1 reject a weld recently or, ~~you know~~, obviously there  
2 is going to be routine conversation.

3 Concerns is a very broad definition.

4 Q .. Is the answer yes?

5 A Given a very broad definition of concerns,  
6 I guess it would have to be yes.

7 Q All right, your predecessor was Mr. Bryant

8 MR. JOHNSON: I think it was Mr.

9 Maxwell.

10 THE WITNESS: Yes, Mr. Maxwell.

11

12 BY MR. GUILD:

13 Q Did you ever learn from either Mr. Maxwell  
14 or Mr. Bryant at the time you arrived at Catawba of  
15 concerns by welding inspectors?

16 A Well, I understand in my overall knowledge  
17 of the Catawba project that there have been concerns  
18 expressed prior to my coming to Catawba by some  
19 inspection personnel.

20 And they had been essentially already  
21 reviewed or had been addressed in some way or  
22 whatever was done.

23 It was closed out, in essence; and so I was  
24 aware of no open issues, open case files, regarding  
25 Catawba at that time. It is very common to have

1 at a construction site regularly, concerns expressed  
2 to us.

3 It is very common. This goes on through-  
4 out the construction process, and we handle each of  
5 them as they come up, obviously.

6 Q But your answer is you were aware of  
7 concerns expressed by welding inspectors at the time  
8 you took the position at Catawba?

9 MR. JOHNSON: He said he was aware  
10 of no open issues.

11 MR. GUILD: I heard him, let him  
12 answer the question, please.

13 THE WITNESS: To the best of my  
14 recollection as I recall from Mr. Maxwell,  
15 I don't mean I don't remember any details;  
16 it is kind of--I think that Mr. Maxwell may  
17 have been involved with concerns of some  
18 welding inspectors.

19 I'm not absolutely sure of that, but as  
20 I recall he had mentioned some welding  
21 inspectors that had mentioned some concern  
22 to him.

23 I know there were concerns that  
24 involved welding, okay?

1 BY MR. GUILD:

2 Q All right, do you know whether those  
3 concerns were ever reflected in an inspection report?

4 A I know the Region did a review of some  
5 concerns that were expressed at one time. I think  
6 there is, at least to the best of my recollection,  
7 there is at least one inspection that was done as a  
8 result of other concerns other than, you know, the  
9 Task Force concerns.

10 Q Other concerns by welding inspectors?

11 A I'm not sure of the inspectors' titles. It  
12 may very well have been a welding inspector. It  
13 involved some degree of welding.

14 MR. JOHNSON: I think Mr. Bryant  
15 would be in a better position to answer  
16 these particular questions.

17 THE WITNESS: It was prior to--well,  
18 let me think--I don't recall the date but it  
19 was a Regional Inspector follow up of that  
20 particular concern, whatever it was.

21 As I recall I didn't get involved  
22 personally.

23

24 BY MR. GUILD:

25 Q Did Mr. Bryant bring to your attention in



1 the course of you taking up your duties at Catawba  
2 previous concerns expressed by welding inspectors?

3 A I don't recall that he did, no.

4 Q Did Mr. Bryant bring to your attention any  
5 matters of special emphasis or concern that he was  
6 informed of that he passed on to you as you took  
7 over there?

8 A Certainly he informed me of issues and  
9 certain areas that he may have wished me to inspect.  
10 There was a continuing effort and certainly some of  
11 that happened at the very beginning as well.

12 I don't recall every conversation and advice  
13 that he gave me. He conducted a large team  
14 inspection at the beginning of Catawba, and there  
15 were some items identified in that team inspection  
16 which required quite a bit of follow up.

17 That would be an example of one of the  
18 things, that team inspection would be an example of,  
19 for instance, an area that he wanted to make sure  
20 that I followed up on.

21 Q Help me understand what that term means,  
22 "a team inspection".

23 A It means multiple Inspectors. We take a  
24 team of people qualified in various engineering  
25 disciplines and look in the multiple areas at the

U.S. NUCLEAR REGULATORY COMMISSION  
Office of Inspector and Auditor

Date of transcription May 12, 1983

Report of Interview

Carl E. Alderson, Chief, Quality Assurance Services, United Energy Services, Inc., was interviewed in Sandy Springs, Georgia, regarding Region II, U.S. Nuclear Regulatory Commission (NRC)/Catawba Nuclear Power Station (CNPS), in regard to the allegations provided in the Government Accountability Project's (GAP) April 21, 1983, letter. Alderson, currently the Chief, Quality Assurance Services, United Energy Services, Inc., advised that he was formerly employed by NRC as the Director, Enforcement and Investigation Staff, until April 16, 1983. Mr. Alderson provided the following information in response to questions:

He recalled the two memoranda which P. K. Van Doorn, NRC Senior Resident Inspector (SRI), CNPS, wrote to him through J. C. Bryant, Chief, Reactor Projects Section, Region II. The March 15, 1982, memoranda collectively wrote of four Duke Power Company (DPC) employees who had requested an appointment with Van Doorn to discuss concerns about the welding inspection program of CNPS. Three of the four quality control (QC) welding inspectors met with Van Doorn on February 1, 1982; the fourth QC welding inspector met with Van Doorn on March 3, 1982.

Alderson described that considerable discussion transpired after receipt of the Van Doorn memoranda. These discussions included the Region II Regional Administrator; Alderson; J.C. Bryant, Chief, Reactor Projects Section 2A; Van Doorn, R. C. Lewis, Director, Division of Project and Resident Programs and other Region II personnel. Although it was agreed that the DPC Task Force would address the concerns of the welding inspectors, Alderson advised that he also directed that Region II should not discount consideration possible avenues of pursuit considered appropriate to the nature of the allegations. Alderson cited a September 30, 1982, memorandum which he wrote to J. Bryant through his supervisor (Lewis). The Alderson memorandum requested that in addition to the DPC task Force efforts, the SRI (Van Doorn) should specifically address four areas of concern which had been identified; additionally, Alderson advised that whenever necessary, additional information to include contact with the concerned DPC employees should be obtained.

Alderson advised that during the ensuing months, he was informed that his request had been fulfilled and that no further Region II action was required. In support of this conclusion, Alderson mentioned a February 1, 1983, memorandum which he received from Van Doorn via Acting Chief, Reactor Projects Section, A. J. Ignatois. In his memorandum Van Doorn writes:

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Investigation on May 4, 1983 at Sandy Springs, GA File # L3-52  
by Patrick McKenna Date dictated May 12, 1983

"My conclusion is that the DPC investigation was complete and that resultant recommendations and actions taken were planned and appear adequate to address the concerns. I discussed both harassment and falsification during the interview process although there appear to have been occasional disagreements between QC and craft personnel, I conclude that harassment is not a legitimate concern at Catawba. I further conclude that falsification is not a concern at Catawba...

My recommendation is that we consider Case No. 2G022 closed."

Alderson concluded the interview advising that he was unaware of any improper activity by NRC personnel and described that DPC has historically been a utility responsive to any NRC direction/commentary.

MAY 18 1982

MEMORANDUM FOR: Jack Bryant, Chief, Reactor Projects Section 2A  
THRU: Richard C. Lewis, Director, PRP Division  
FROM: Carl E. Alderson, Director, EIS  
SUBJECT: CATAWBA - CONCERNS OF WELDING INSPECTORS  
(REFERENCE: CASE 2G022)

I have reviewed the two memoranda, both dated March 15, 1982, which were sent to me by P. K. VanDoorn. The two memos document the concerns which were expressed to him by four different welding inspectors at the Catawba site.

When you and I first discussed this matter, I concurred that we should permit the DPC Task Force to address these issues and then review their actions. After reviewing the enclosures to VanDoorn's memos in detail, I still concur with that decision. However, after seeing the great number of very specific issues involved from these [redacted] inspectors alone, and assuming that additional QC inspectors have or will present additional issues to the Task Force, I believe that you should take action which will facilitate the eventual NRC review of this matter. Specifically, you should ensure that the Task Force is maintaining records which clearly identifies:

1. The identity of each individual who presents concerns to them;
2. Each of the concerns presented by the individual;
3. The Task Force's finding regarding each specific concern and the bases for the finding; and
4. The actions taken by the licensee in those cases where a concern is found to be valid.

It would be a good idea to have VanDoorn scan over what the Task Force has done to this point to ensure that the specificity identified above exists and to make sure that DPC isn't doing a lot of "hand-waving" to resolve the concerns. If they are, our efforts to determine adequacy of their followup will require a monumental amount of manpower.

Please keep me informed regarding the Task Force's progress and forward copies of any relate documents to me for inclusion in our case file.

Carl E. Alderson

R11:EIS *CA*  
CEA:alderson:cmc

*8308040587*

ATTACHMENT 17



SEP 30 1982

MEMORANDUM FOR: Jack Bryant, Chief, Reactor Projects Section 1C  
THRU: R. C. Lewis, Director, Division of Project and Resident Programs  
FROM: C. E. Alderson, Director, Enforcement Staff  
SUBJECT: CATAWBA - CONCERNS OF WELDING INSPECTORS (REF. CASE 2G022)


This refers to the two memoranda, both dated March 15, 1982, which were sent to me by P. K. VanDoorn and to my memorandum to you dated May 18, 1982 on this subject.

Based on our telephone conversation on September 28, 1982, it is my understanding that VanDoorn is reviewing the results of DPC's task force efforts. In this regard I would like to assure that his review specifically addresses the four concerns identified in the enclosure. In pursuing these four concerns the inspector should feel free to contact the individuals expressing the concerns where necessary to obtain more specific information. If information of significance is developed on any of those four items, please inform me immediately.

Please ensure that the Enforcement Staff is provided copies of any reports addressing this matter.

Carl E. Alderson

Enclosure:  
Specific Concerns

R11:ES   
CEAlderson:cmc  
9/30/82

~~8308040649~~





Enclosure

SEP 30 1967

Specific Concerns

1. Supervisor [REDACTED] instructed worker [REDACTED] to falsify INI 162-27.
2. Supervisor [REDACTED] instructed worker [REDACTED] to sign a rewritten NCI-7514.
3. Worker [REDACTED] feels there is falsified information recorded in VN 14967, and NCIs 13,053 and 13,028.
4. [REDACTED] feels there is knowingly misinformation in NCI 7850.

U.S. NUCLEAR REGULATORY COMMISSION  
Office of Inspector and Auditor

Date of transcription September 1, 1983

Report of Interview

                     Inspector, Duke Power Company (DPC), was interviewed at the office of the NRC Senior Resident Inspector (SRI) at the Catawba Nuclear Power Station (CNPS).                     , who since he commenced his employment with DPC on July 19, 1976, provided the following information:

He was unaware of any incidents of harassment or intimidation of DPC employees as a result of having contacted NRC and was unaware of any other incidents where any form of REcrimination was directed by DPC management toward any employee for voicing possibly unpopular or problematic opinions. The only incident he wished to relate to the Office of Inspector and Auditor (OIA) occurred at Reactor No. 2 (location 0 degrees, 572 elevation, G Frame) since from an inspection standpoint he was concerned about rupture strengths of welds. He described that the particular weld about which he was concerned and cited had some gouges which did not meet the appropriate standards of the American National Standards Institute. Accordingly, he notified his immediate supervisor,                     , who in turn notified his supervisor                     .                      then advised him that he would have the design engineers check the particular gouge/weld and then directed him to sign off on the weld. He did, in fact, sign off on the weld prior to viewing the design engineers results and did so on the assurance of                      that this would be properly done.

He concluded the interview by advising he had no additional information to provide OIA.

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Investigation on August 24, 1983 at Rock Hill, S.C. File # 83-52  
by *Patrick McKenna* Date dictated September 1, 1983

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U.S. NUCLEAR REGULATORY COMMISSION  
Office of Inspector and Auditor

Date of transcription August 31, 1983

Report of Interview

[REDACTED], Quality Assurance Division No. 2, Construction Department, Duke Power Company (DPC), was interviewed in the office of the NRC Senior Resident Inspector (SRI), Catawba Nuclear Power Station (CNPS) commencing at 1:00 p.m. He said he commenced his employment with DPC on [REDACTED] and his current supervisor (since June 1983) had been [REDACTED] and his former supervisor was [REDACTED]. Upon interview regarding problem areas which may have been an issue regarding DPC and the NRC handling of employee/employer problems he had provided the following information:

He has never felt there has ever been any problem with a DPC employee contacting NRC with any problem and no actual or perceived intimidation concerning his employment has ever existed. Moreover, the issue of harassment and intimidation have never been a problem area during his entire period of employment at DP&L/CNPS. The threat of transfers/terminations being used as a potential retaliatory weapon against a DPC employee, in his opinion has never been an issue.

He was aware that there has been some concern on the part of DPC regarding some problems presented to DPC management and to the best of his knowledge, these problems were addressed by a DPC Task Force. Although unable to provide an approximate time frame of the incident, he was contacted by [REDACTED] and one or two other individuals whose identities he could not recall, during the time the task force was in progress.

In closing, he reiterated that during the interview by [REDACTED] and the other individual(s) that he related to them he had no problems in any of the above described areas with either DPC and/or NRC.

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Investigation on August 23, 1983 at Rock Hill, S.C File # 83-52  
by Patrick McKenna Date dictated August 31, 1983

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U.S. NUCLEAR REGULATORY COMMISSION  
Office of Inspector and Auditor

Date of transcription August 31, 1983

Report of Interview

██████████ Inspector, Duke Power Company (DPC), who commenced his employment with DPC in May 1977, upon interview in the office of the NRC Senior Resident Inspector (SRI), Catawba Nuclear Power Station (CNPS), provided the following information concerning the possibility of falsification of documents. He had no knowledge or involvement of any such fraudulent activity. Regarding possible harassment or intimidation of DPC employees as a result of having contacted the NRC, he similarly advised he was unaware of any such instances.

The only other information he wished to relate to the Office of Inspector and Auditor pertained to the technical issue which he felt NRC might better have taken a strong stand on. He explained that the incident in question was referred to the DPC Task Force as Item K-2 which focused on a dome plate he was involved in inspecting. On July 31, 1980, he observed an excessive pitting in the dome plate which had already been installed in the ground. However, he would not authorize a certification for that weld and wrote a Non-Conforming Item (NCI). His point of concern was that although this particular weld issue was rectified as a result of the DPC Task Force, his stance on not passing that dome plate from an inspection stand point took approximately two years.

He felt that if the NRC position regarding the NCI's had been stronger his position as the inspector would have been upheld at the time the NCI was written. However, based upon the procedures, his judgment was not accepted and it took approximately two years for DPC to eventually agree to correcting a problem which he had identified during his initial inspection. The NCI in question was No. 9092 which DPC Task Force eventually closed out on April 3, 1982, 21 months after it was written.

He was aware of various other alleged problem areas with DPC employees and some issues with NRC. However, he was unaware of any specific incidents which he could relate and other than locker room or parking lot hearsay conversations of no importance. ██████████ could provide no further information.

Investigation on August 23, 1983 at Rock Hill, S.C File # 83-52  
by Patrick McKenna Date dictated August 31, 1983



U.S. NUCLEAR REGULATORY COMMISSION  
Office of Inspector and Auditor

Date of transcription September 1, 1983

Report of Interview

[REDACTED], Duke Power Company (DPC), upon interview at the Office of the Senior Resident Inspector (SRI), U.S. Nuclear Regulatory Commission (NRC), at the Catawba Nuclear Power Station (CNPS) provided the following information:

He has been employed at DPC for [REDACTED] years and became a [REDACTED] on [REDACTED]. His current supervisor, [REDACTED], who recently commenced employment at CNPS having been transferred there from McGuire Nuclear Power Station, [REDACTED] replaced his former supervisor, [REDACTED].

His first contact with NRC was at least three years earlier when he spoke with the then SRI George Maxwell when they discussed a problem [REDACTED] had in the area of electrical drawings which prompted [REDACTED] to write a Non-Conforming Item (NCI). This problem primarily concerned the traceability of materials which was merely a deviation from procedure and not a violation of procedures per se, which could lead to additional potential safety problems.

Regarding the issue of possible recrimination by DPC for any employee who might contact the NRC, he recalled a meeting wherein [REDACTED] essentially stated that DPC could potentially take action against an employee who contacted the NRC. A fellow DPC employee, [REDACTED], had taped the meeting and the conversations by [REDACTED], however, he could offer no further information concerning this incident and was not personally familiar with any instances wherein retribution may have occurred although the comments made by [REDACTED] were considered by [REDACTED] and other DPC employees as a strong warning.

The DPC Task Force "admitted" 57 instances of problem areas regarding CNPS which he characterized as being illustrative of the DPC position concerning a responsive and conscientious program of quality assurance (QA) and quality control (QC) welding. Regarding a specific instance in this regard, he recalled an inspection issue incident regarding another DPC welding employee, [REDACTED]. During this incident, circa 1981, [REDACTED] refused to sign off on a weld that was reportedly done approximately two years previously; the problem with [REDACTED] approval of the weld was that it was in a hard to reach area and that he ([REDACTED]) could not see the weld. Upon being notified of the incident by [REDACTED], [REDACTED] contacted his supervisor, [REDACTED], who ordered that [REDACTED] sign off on the weld. [REDACTED] reluctantly did so and listed a disclaimer on his approving inspection. Consequently, [REDACTED] disclaimer went through appropriate channels, however, the weld was approved. He ([REDACTED]) characterized that this instance as failure to support QA/QC welding inspectors.

Investigation on August 24, 1983

at Rock Hill, S.C

File # 83-52

by Patrick McKenna

Date dictated September 1, 1983



Another area which he briefly wished to comment on pertained to an Annual Performance Evaluation which he received from [REDACTED] his supervisor, in April 1983. He received an unsatisfactory rating which translated into a 7 percent raise wherein if he had gotten a higher rating he would have received a 12 percent raise. He felt that the commentary in his evaluation by Allen regarding his apparent failure in the area of "going along with management" focused on his support of subordinate inspectors who did not approve some welds. Accordingly, since he brought these welds to the attention of DPC management he was provided with the unsatisfactory rating.

He explained that during a recourse procedure concerning the unsatisfactory rating he was advised that miscommunication was considered to be an issue in the rating although he was not otherwise provided with any substantive support for the rating by [REDACTED]. In this regard, he felt he was being discriminated/harassed by DPC contrary to provisions of 10 CFR 50.7.

Concluding, he characterized DPC QA/QC problems as having taken a clearly secondary role in the opinion of management and have, on occasion, been circumvented strictly to adhere to the construction schedule. In this regard, he stated that during his assignment at DPC he had continually strived for excellence in welding and a superior QA/QC program. However, upon repeatedly being "beaten down" by the efforts of DPC management and most often in the person of [REDACTED], his supervisor, he had become resigned to the situation that the QA/QC program at CNPS will be done the way DPC wishes it be done and not necessarily the way it should be done.

He advised he had no further commentary to make to the Office of Inspector and Auditor although recommending consideration to interview of other DPC welding inspector personnel.

December 20, 1982

Synopsis of Comments Concerning Welding Inspector Concerns:

Interviewees consisted of 9 supervisors and 19 inspectors.

Supervisors were asked questions concerning adequacy of the task force effort, support of inspectors, falsification, and specific concerns (as applicable).

Inspectors were asked questions concerning adequacy of the task force effort, support of inspectors, knowledge of any technically inadequate installation at Catawba, ability to talk to the NRC without recrimination, falsification, and specific concerns (as applicable).

Supervisor Comments:

Task force effort was adequate and support (or perceived support) has improved (all).

Effort incomplete in that supervision (especially Baldwin) was not allowed to defend their position, little feedback to supervision as to whether they made inappropriate judgements or had communicated poorly (2).

Still need improvements in implementation of R2 program and resolution feedback (3 first line supervisors).

No overt falsification occurred but misjudgements may have been made by second and third line supervision (2).

Need better communications with QA; get better answers from QA personnel than some QC supervisors (1).

Still have problems with certain craft crews; e.g. quality of work, attitude, and craft taking items to a different inspector to get item accepted (1).

There is pressure not to use the recourse procedure (2).

Some items are argued about for 3 days that would take 30 seconds to fix (1).

Different inspector crews are interpreting procedures differently. )

Inspector Comments:

Task force effort was adequate (13).

Task force effort was inadequate (4).

Support for inspectors has improved and is now generally adequate (all except one N/A, yes with comments provided concerning needed improvements).

No technically inadequate installations.

No recrimination would occur if I talk to NRC (10).

Some recrimination would result from talking to NRC (9- mostly indirect recrimination).

No overt falsification identified (all).

Signed holdpoints for items I did not inspect or did not

agree with (5).  
Task force feedback was incomplete (total results not understood or appreciated - 8).  
Specific concerns not adequately addressed (7).  
Different inspector crews interpreting procedures different need meetings with all inspectors (4).  
Feel pressure not to use recourse; less open communication, such as with QA, than before (8).  
Recourse takes too long (2).  
RT and Cavender used to override inspectors; should be used to justify technical acceptance not to override inspector call (1).  
Still need improvement in implementation of R2 program and resolution feedback (6).  
Concerned whether R2A (vs. NCI) is adequate to handle problems (4).  
Problems are still encountered with specific craft crews (3).  
Still some construction leaning, e.g. inadequate answer from T/S (3)

Singular Comments:

Need QA T/S group.  
A simple UT wall thickness gage would alleviate many questions concerning underwall conditions.  
Need direct contact with person resolving concerns; if the question goes through more than one person, the original question doesn't get fully answered.  
Craft (PHM's) is abusing the weighted value system, e.g. fitting up joints that they know are mislocated to get weighted value credit.  
Feel downgraded and have lower motivation.  
Personnel comments.

December 20, 1982

~~Confidential~~

MEMO TO FILE

Subject: Catawba Welding Inspector Concern

Attached are notes from Kim VanDoorn, Resident NRC Inspector-Catawba Nuclear Station. From his interviews with welding inspectors and supervision in regards to the concerns submitted by a portion of these welding inspectors Kim's summary remarks are that all of the inspectors and supervisors interviewed believed the installations at Catawba are technically adequate. He also found that no supervisor had intended to overtly falsify any record or to cause anyone to falsify any record. Inspectors interviewed concurred in this assessment. There was a feeling that judgements involved may not have been entirely proper in some cases but that no falsification occurred and no inspector felt that they were asked to falsify any document. Kim will be recommending that no further interviewing is necessary in regards to this matter. He will be following up on corrective action completion.

The following specifics were discussed in regards to his synopsis:

There is still a need to communicate better the workings of the Task Force and the Management Corrective Action, both with supervision and with inspectors. The pressure in regards to the recourse procedure may be pressure to answer or satisfy the inspector rather than pressure not to use the recourse procedure. In regards to the inspector comments, those who felt that the Task Force effort was inadequate may not understand that programmatic action was taken in regards to their specific concern. This again, points out the need to communicate the completion of our management action. The inspectors perception of indirect recrimination as a result of talking to the NRC is undoubtedly the feeling that they might be looked down on for talking with the NRC. All indicated that they would go to the NRC. Several comments indicated that the inspectors do not like going through the chain of command for answers and like the situation that existed previously where they could access the QA Technical Support Group more directly.



GWG/ph

cc: W H Bradley  
W O Henry ✓  
L R Davison



December 20, 1982

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

*filed*

JAN 07 1983

Duke Power Company  
ATTN: Mr. H. B. Tucker, Vice President  
Nuclear Production Department  
422 South Church Street  
Charlotte, NC 28242

Gentlemen:

SUBJECT: REPORT NOS. 50-413/82-32 AND 50-414/82-30

This refers to the routine safety inspection conducted by Mr. P. K. VanDoorn of this office on November 26 - December 25, 1982, of activities authorized by NRC Construction Permit Nos. CPPR-116 and CPPR-117 for the Catawba facility and to the discussion of our findings held with Mr. T. H. Robertson, Construction Engineer, at the conclusion of the inspection.

Areas examined during the inspection and our findings are discussed in the enclosed inspection report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector.

Within the scope of this inspection, no violations or deviations were disclosed.

We have examined actions you have taken with regard to previously identified enforcement matters and unresolved items. The status of these items is discussed in the enclosed report.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosure will be placed in the NRC's Public Document Room unless you notify this office, by telephone, within ten days of the date of this letter and submit written application to withhold information contained therein within thirty days of the date of this letter. Such application must be consistent with the requirements of 10 CFR 2.790(b)(1).

Should you have any questions concerning this letter, we will be glad to discuss them with you.

Sincerely,

H. C. Dance, Chief  
Project Branch 2  
Division of Project and  
Resident Programs

Enclosure: (See Page 2)

~~8302150636~~

Duke Power Company

2

JAN 07 1983

Enclosure:

Inspection Report Nos. 50-413/82-32  
and 50-414/82-30

cc w/encl:

J. W. Hampton, Station Manager  
J. C. Rogers, Project Manager



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

JAN 07 1983

Report Nos. 50-413/82-32 and 50-414/82-30

Licensee: Duke Power Company  
422 South Church Street  
Charlotte, NC 28242

Facility Name: Catawba Units 1 and 2

Docket Nos. 50-413 and 50-414

License Nos. CPPR-116 and CPPR-117

Inspection at Catawba site near Rock Hill, South Carolina

Inspector: *[Signature]* 1/7/83  
K. VanDoorn Date Signed

Approved by: *[Signature]* 1/7/83  
J. E. Bryant, Section Chief, Division of Date Signed  
Project and Resident Programs

SUMMARY

Inspection on November 26 - December 25, 1982

Areas Inspected

This routine announced inspection involved 145 resident inspector-hours on site in the areas of review of nonconforming items; followup of licensee and NRC identified items; followup of IE Bulletins and Circulars; and followup of licensee task force actions concerning welding inspector concerns.

Results

Of the four areas inspected, no violations or deviations were identified.

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## DETAILS

### 1. Persons Contacted

#### Licensee Employees

- G. W. Grier, Corporate QA Manager
- J. C. Rogers, Project Manager
- S. W. Dressler, Engineering Manager
- \*T. H. Robertson, Construction Engineer
- W. O. Henry, QA Manager, Technical Services
- L. R. Davison, Project QA Manager
- \*R. A. Morgan, Senior QA Engineer
- W. H. Bradley, QA Staff Assistant
- J. W. Willis, Inspection Superintendent
- \*C. A. Bell, QA Supervisor, Technical Services
- J. C. Shropshire, QA Supervisor

\*Attended exit interview

### 2. Exit Interview

The inspection scope and findings were summarized on December 23, 1982 with those persons indicated in Paragraph 1 above.

### 3. Licensee Action on Previous Enforcement Matters

- a. (Closed) Unresolved Item (413, 414/81-19-01): Control of measurement accuracy during piping system installation inspection. The licensee reinspected piping per ten design drawings and verified that established inspection techniques were adequate. The inspector verified this action and considers it satisfactory.
- b. (Closed) Unresolved Item (413/82-10-01, 414/82-04-01): Evaluation of ground water seepage into auxiliary building. Additional evaluations have been properly performed and it appears that existing programs were in place to assure correction of this condition. Licensee actions are considered satisfactory.
- c. (Closed) Unresolved Item (413, 414/81-11-01): Control of magnetic particle inspection technique. Licensee experimentation has been performed to show that previously performed inspections were adequate, procedure changes were implemented, and appropriate training was conducted concerning this item. The inspector verified these actions and considers them to be satisfactory.
- d. (Closed) Violation (413, 414/81-08-01): Failure to provide procedures to control clearance between piping systems/components. Previously found discrepancies have been corrected, appropriate requirements have



been implemented, and appropriate inspections have been incorporated to assure piping clearance requirements are met. The inspector verified these actions and considers them to be satisfactory.

- e. (Closed) Violation (413, 414/81-16-01): Failure to follow procedure for control of surface applied materials. The licensee has corrected the identified discrepancies, a procedure change has been implemented, and appropriate personnel have been trained. The inspector verified these actions and considers the satisfactory.
- f. (Closed) Violation (413/82-03-03): Use of unapproved marker on stainless steel piping. The licensee corrected the discrepancy identified and trained appropriate personnel. The inspector verified these actions and considers them satisfactory.

No violations or deviations were identified.

#### 4. Unresolved Items

Unresolved items were not identified during this inspection.

#### 5. Independent Inspection Effort

The inspector conducted general inspection of site work and work activities; observed protection and storage of mechanical equipment, electrical equipment, electrical cables, instrumentation and piping; and observed housekeeping. The inspections were performed in the auxiliary building, containment buildings, and storage areas.

No violations or deviations were identified.

#### 6. Nonconforming Item Report Review

The inspector reviewed numerous nonconforming item reports (NCI's) to determine if requirements were met in the areas of documentation, approvals, evaluation, justification, and corrective action.

No violations or deviations were identified.

#### 7. Licensee Identified Item 50.55(e)

(Closed) (CDR 413, 414/81-28): Radiographs of welds for refueling water storage tanks supplied by RECO do not meet code requirements. The final response for this item was submitted on December 16, 1981. The inspector verified the licensee actions and considers them to be satisfactory.

No violations or deviations were identified.

## 8. Followup of IE Bulletins

The inspector verified that the licensee had reviewed IE Circulars and had specified appropriate corrective action. The following IE Circulars will be closed:

- 78-03      Packaging greater than Type A quantities of low specific activity radioactive material for transport
- 80-22      Confirmation of employees qualifications.
- 81-14      Main steam isolation valve's failure to close.

No violations or deviations were identified.

## 9. Followup of IE Bulletins

The inspector verified that the licensee had reviewed IE Bulletins, responded as required, and implemented acceptable corrective actions. The following IE Bulletins will be closed:

- 79-24      Frozen lines
- 80-24      Prevention of damage due to water leakage inside containment
- 81-03      Flow blockage of cooling water to safety system components by Corbicula SP and Mytilus SP

No violations or deviations were identified.

## 10. Followup of Licensee Task Force Actions Concerning Welding Inspector Concerns

The inspector conducted further review of licensee actions regarding welding inspector concerns (See NRC Report Nos. 413/82-21 and 414/82-19 for previous inspection performed). The inspector verified implementation of corrective actions performed to date. The corrective actions required by the task force recommendations appear adequate to address the concerns of the welding inspectors. The inspector also interviewed 9 QA supervisors and 19 QA welding inspectors to discuss specific concerns and assess the adequacy of the corrective actions implemented. All but 4 individuals stated that the task force effort was adequate and no individuals indicated that they had knowledge of any technically inadequate installations at Catawba. Comments were made as to needed improvements in communication/support of inspections. These comments were discussed with the Corporate QA Manager on December 20, 1982. In summary, the overall task force effort and resultant recommendations appears adequate although some corrective actions are yet to be implemented. The inspector will review the incompleated corrective actions and will conduct further inspection of selected concerns. The results of these inspections will be included in a later NRC report.

No violations or deviations were identified.



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

AUG 31 1982

SSINS 0250

Regional Office Instruction No. 0908

DISSEMINATION OF DRAFT REPORTS

A. Purpose:

To inform the Region II staff, including resident inspectors, of the prohibition against disseminating or discussing draft inspection or investigation reports with licensees or their agents.

B. Discussion:

In the past few months there have been cases in other regions where licensees or their agents were permitted to review, or were provided copies of, draft investigation or inspection reports. In at least one case the report was rewritten to reflect comments made by the licensee. While it was subsequently determined that the changes were made in good faith, to make the report more accurate, the disclosure of the practice raised serious questions regarding our independence from those we regulate. As a result the Executive Director for Operations (EDO) issued two memoranda (copies enclosed) which specifically prohibit permitting licensees or their agents to review, or providing them copies of, draft inspection or investigation reports.

While it is unfair to the public which we represent to permit the licensees to review and influence our reports, beyond that permitted by regulation, it would be equally unfair to the licensee for us to discuss the substance of a report with the news media or the public before the licensee had been fully and officially informed of the matter. Therefore, the EDO's prohibition is extended to discussion of the contents of draft reports with, or the providing of copies of draft reports to, anyone outside the NRC.

A draft inspection report that has not been reviewed and approved by the supervisor, and higher Region II management where appropriate, represents the view of the inspector and not necessarily the Regional position on the subject. Therefore, draft inspection reports shall not be provided to other NRC offices except as permitted by other Regional Office Instructions or with the knowledge and consent of the Regional Administrator.

Finally, draft investigation reports may from time to time be provided to Region II staff members by the Office of Investigations; requesting assistance from the Region II staff in ensuring the technical clarity and accuracy of the report. Such reports do not represent the official position

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of the Office of Investigations until they are in final form, signed and formally transmitted to the Regional Office. Except for this intra-office review, the above prohibitions apply equally to draft investigation reports.

These prohibitions do not affect the requirement for inspectors to conduct exit interviews in which they inform licensees of the inspection findings, including any potential violations, deviations or unresolved items. While inspectors may provide a written outline of the findings, such practice is discouraged. If used, the inspector must exercise great care to ensure that: (1) the document contains only sufficient information to identify the issue and does not appear to be a draft Notice of Violation or Deviation, or Report Details; and (2) the licensee understands that the document reflects the view of the inspector and is subject to review and modification by Region II management.

These prohibitions also do not affect Region II employees' responsibilities to identify and discuss with the licensee, other NRC employees, or other agencies, prior to issuance of the final document, conditions which must be promptly addressed to eliminate or prevent safety concerns.

C. Actions:

1. Region II employees shall not discuss the contents of draft documents with licensees or their agents, the news media or the public and shall not provide copies of such documents to them or permit them to review such documents, without the knowledge and consent of the Regional Administrator.
2. Region II employees shall not provide copies of draft inspection or investigation reports to other NRC Offices except as permitted by and in accordance with other Regional Office Instructions or with the knowledge and consent of the Regional Administrator.
3. Changes to correct errors in documents, which have been officially issued to licensees, shall be accomplished in accordance with the appropriate Regional Office Instruction and require the concurrence of the Director, Enforcement Staff before issuance.

D. Contact:

Questions or comments should be addressed to the Director, Enforcement Staff at Extension 5505.

AUG 31 1982

E. Effective Date:

This Instruction is effective upon issuance.

*James P. O'Reilly*  
James P. O'Reilly  
Regional Administrator

Enclosures:

1. W.J. Dircks' Memo dtd 3/24/82
2. W.J. Dircks' Memo dtd 7/30/82

Distribution List: A



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

ROI No. 0908  
Enclosure 2

JUL 30 1982

MEMORANDUM FOR: Richard C. DeYoung, Director, OIE  
Ronald C. Haynes, Regional Administrator, RI  
James P. O'Reilly, Regional Administrator, RII  
James G. Keppler, Regional Administrator, RIII  
John T. Collins, Regional Administrator, RIV  
Robert H. Engelken, Regional Administrator, RV

FROM: William J. Dircks  
Executive Director for Operations

SUBJECT: DISTRIBUTION OF REPORTS OF INSPECTION

32 AUG 5 11:00 AM '82

On March 24, 1982, I issued the enclosed memorandum prohibiting the release of draft investigation reports to licensees or their agents without my express permission.

A question has subsequently been raised regarding the release of draft inspection reports. Under no circumstances, should draft inspection reports be reviewed with or given to licensees or their agents without my express permission. Release of completed inspection reports for proprietary review is to be in accordance with provisions of Inspection and Enforcement Manual, MC 1025, revised April 17, 1981.

(Signed) William J. Dircks

William J. Dircks  
Executive Director for Operations

Enclosure:  
Memo dated 3/24/82

cc: Victor Stello, DEDO/ROGRG  
Guy Cunningham, ELD  
Harold Denton, NRR  
John Davis, NMSS

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

ROI No. 0908  
Enclosure 1


MAR 24 1982

MEMORANDUM FOR: Richard C. DeYoung, Director, Office of Inspection  
and Enforcement  
Ronald C. Haynes, Regional Administrator, Region I  
James P. O'Reilly, Regional Administrator, Region II  
James G. Keppler, Regional Administrator, Region III  
John T. Collins, Regional Administrator, Region IV  
Robert E. Engelken, Regional Administrator, Region V

FROM: William J. Dircks  
Executive Director for Operations

SUBJECT: DISTRIBUTION OF REPORTS OF INVESTIGATION

As we discussed on March 5, 1982, release of completed reports of investigation for proprietary review is to be in accordance with the provisions of Inspection and Enforcement Manual, MC 1025, revised April 17, 1981. Under no circumstances will draft reports of investigation be reviewed with or given to licensees or their agents without my express permission.

  
William J. Dircks  
Executive Director  
for Operations

cc: V. Stello, DEDROGR  
G. Cunningham, ELD  
H. R. Denton, NRR  
J. G. Davis, NMSS

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U.S. NUCLEAR REGULATORY COMMISSION  
Office of Inspector and Auditor

Date of transcription February 16, 1984

Report of Interview

Vergil Brownlee, Chief, Project Section 2A, Division of Project and Resident Programs, Region II, U.S. Nuclear Regulatory Commission (NRC) was interviewed concerning the Quality Assurance (QA) and Quality Control (QC) Organizations of the Duke Power Company (DPC) at the Catawba Nuclear Station (NS), Rock Hill, South Carolina. During the interview, Brownlee provided the following information pertaining to an allegation by the Government Accountability Project (GAP) that DPC did not implement its 1974 commitment to separate the QA/QC function from Construction and Engineering until 1982.

Criterion I, Appendix B to 10 CFR 50 requires the QA organization performing QA functions have sufficient authority and organizational freedom to identify quality problems; to initiate, recommend, or provide solutions, and to verify implementation of solutions. Appendix B does not specifically address requirements for a QC organization. Criterion X, however, addresses the organizational separation required for inspection activities affecting quality and requires that QC inspections be performed by individuals other than those who performed the activity being inspected. Brownlee stated that the DPC QA/QC organization at Catawba has been in compliance with 10 CFR since 1973. Brownlee then provided a chronology of significant events pertaining to NRC's review of the QA/QC organizations of DPC.

- February 1973: NRC initial QA audit for Catawba found that the Construction Department QA manager was not independent of construction costs and schedules as required by 10 CFR 50, Appendix B, Criterion I.
- May 29, 1973: NRC met with DPC and discussed the DPC QA program, which showed QC personnel reporting administratively to a line organization and functionally to the QA organization. It was also noted that the Senior Vice President of Engineering and Construction was the acting Corporate QA Manager.
- July 1973: NRC completed its evaluation of the DPC QA program for Catawba. NRC received a commitment by DPC to fill the position of Corporate QA Manager before July 1974. With this commitment, NRC found the DPC QA program acceptable.

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Investigation on February 1, 1984 at Charlotte, N. Carolina File # 83-52  
by George A. Mulley Jr. Date dictated February 16, 1984

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- October 12, 1973: NRC issued the Safety Evaluation Report which concluded that the DPC QA organizational structure complied with the requirements of Criterion I of Appendix B, 10 CFR 50, and was acceptable and that the QA staff had been provided with adequate authority and guidance for the implementation of the DPC QA program. Additionally, the Safety Evaluation Report addressed DPC's QC organization and reviewed the independence, responsibilities, authorities, and specific duties of QC inspectors in the electrical, mechanical, welding, and civil disciplines. NRC concluded DPC's QC organizational structure was acceptable.
- February 1, 1974: The roles of the Senior Vice President of Engineering and Construction and the Corporate QA Manager were separated with the Corporate QA Manager reporting to the Senior Vice President of Engineering and Construction.
- April 2, 1974: DPC reported it was going to restructure its QA organization in May 1974 with the QA organization reporting directly to the Corporate QA Manager.
- October 1, 1974: DPC Topical Report reflects the QA organization established on April 2, 1974, which has the QA organization reporting to the Corporate QA Manager and the Corporate QA Manager reporting to the Senior Vice President of Engineering and Construction.
- The Topical Report on QA indicated the QA organization reviews and approves QC inspection procedures and records. The QC staff reports directly to the Senior QC Engineer who reports "functionally" to the Project Senior QA Engineer within the DPC QA organization.
- February 14, 1975: DPC Topical Report on QA adds the commitment that QC inspector certification procedures and certifications are approved by QA.
- April 17, 1975: NRC affirms the acceptability of the DPC Topical Report on QA. The QA organization reports to the Corporate QA Manager who is under the Senior Vice President of Engineering and Construction.
- August 7, 1975: Construction Permits are issued for Catawba. With respect to DPC's QA program the Atomic Safety and Licensing Board Panel stated the DPC QA program meets the requirements established by the Commission.
- February 9, 1981: DPC informed NRC that the Site QC staff was being brought into the QA organization for administrative as well as functional control.
- July 14 1981: NRC accepts DPC proposal to have DPC construction QC included in the DPC QC organization.

February 3, 1983: NRC again affirms acceptability of DPC organization which shows QA organization reporting to the Corporate QA Manager who reports to the Senior Vice President Engineering and Construction.

Brownlee explained that DPC has not been in violation of Appendix B, 10 CFR 50, in the organization of its QA/QC program. The QC inspectors are full time inspectors who do not inspect any of their own work. Additionally, although prior to 1981, the QC inspectors received administrative support from the Project Engineer, functionally they have reported to the QA organization since 1973. The QC inspectors received all instructions and guidance concerning the implementation of the QA program and the conduct of inspections from QA. In turn, the QA organization reports directly to the Corporate QA Manager who is independent of construction and engineering. The DPC QA organization at Catawba Nuclear Power Station has complied with 10 CFR 50, since 1973 in that the QA organization had sufficient authority and organizational freedom to identify problems.

U.S. NUCLEAR REGULATORY COMMISSION  
Office of Inspector and Auditor

Date of transcription June 7, 1983

Report of Interview

James P. O'Reilly, Regional Administrator, Region II, U.S. Nuclear Regulatory Commission (NRC), upon interview provided the following information concerning allegations of NRC management/personnel impropriety(ies) regarding the Catawba Nuclear Power Station.

O'Reilly could provide no information considered pertinent to the inquiry. He and subordinate region II management and field personnel acted appropriately in all endeavors regarding the Catawba Nuclear Power Station.

In January 1982, when Region II was notified by Duke Power Company (DPC) of various concerns of quality control (QC) inspectors, considerable Region II staff attention was devoted to a review of the information. It was recommended and O'Reilly directed, that the matter be referred to DPC for appropriate action. This action was taken with a strict provision that NRC would closely review and/or monitor the actions taken by DPC to ensure appropriate compliance with NRC regulations. Region II would take additional action if warranted by information developed during the review of DPC actions.

Upon completion of the DPC Task Force which addressed QC inspector concerns, DPC provided an extensive briefing regarding the results of its efforts. Region II reviewed in detail DPC actions and decided no further action by NRC was necessary.

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Investigation on May 23, 1984 at Region II File # 83-52  
by Patrick McKenna Date dictated June 7, 1984

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