

**LOUISIANA**  
POWER & LIGHT

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NEW ORLEANS, LOUISIANA 70160

• (504) 595-2204

September 4, 1984

J.M. CAIN  
President and  
Chief Executive Officer

W3B84-0480A

Director of Nuclear Reactor Regulation  
ATTN: Mr. Darrell G. Eisenhut, Director  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

SUBJECT: Waterford 3 SES  
Partial Response to Items  
from Waterford Review Team

- REFERENCES: 1) Letter, D.G. Eisenhut to J.M. Cain,  
"Waterford 3 Review," dated June 13, 1984
- 2) Letter W3B84-0473, R.S. Leddick to D.G. Eisenhut,  
"Program Plan for Resolution of Pre-Licensing  
Issues" dated August 20, 1984

Dear Mr. Eisenhut:

The purpose of this letter is to submit Louisiana Power & Light's responses to issues 12, 13 and 14 as set forth in your June 13, 1984 letter (Reference 1). The responses follow the approach set forth in Attachment 1 to the Program Plan sent to you by LP&L on August 20, 1984 (Reference 2).

The responses have been reviewed and verified by LP&L QA in accordance with procedure QASP 19-13. The designated subcommittee of the Waterford Safety Review Committee also has reviewed the adequacy of the responses for resolving the issues raised. The subcommittee scope of responsibility does not include independent validation of the facts.

The Task Force has indicated by separate correspondence (enclosed) that it is satisfied with the logic of the responses, however, they have not yet completed their independent validation of the facts. The Task Force has committed to notifying me and the NRC immediately should they find significant deviations in the course of their validation. In the event of such notification, LP&L will amend individual responses as may be necessary.

8409060288 840904  
PDR ADOCK 05000382  
A PDR

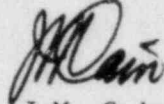
*Boo!*  
*1/1*

Mr. Darrell G. Eisenhut, Director  
W3B84-0480A  
September 4, 1984

Page 2

We request that you commence actions you deem necessary to lead to the resolution of these individual issues.

Sincerely,



J.M. Cain

JMC:DMA:pbs

Attachments

Mr. Darrell G. Eisenhut, Director  
W3B84-0480A  
September 4, 1984

Page 3

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NUS-W3-0012  
August 31, 1984

Mr. J. M. Cain  
President and Chief Executive Officer  
Louisiana Power and Light Company  
317 Barrone Street  
New Orleans, Louisiana 70160

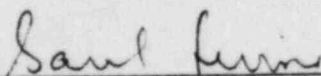
Reference: Letter from D. G. Eisenhut, Director, Division of Licensing,  
USNRC to J. M. Cain, President and Chief Executive Officer,  
LP&L, Waterford 3 Review, June 13, 1984

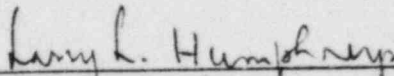
Dear Mr. Cain:

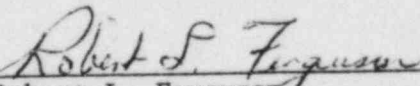
We understand that you plan to submit LP&L responses to the NRC covering  
Issues 12, 13 and 14 of the referenced letter.

The Task Force has no objection to this course of action. We have studied  
these issues and find the logic stated in the LP&L responses to be adequate.  
You should note that the Task Force has not yet completed its independent  
validation of the facts presented in the responses. We will notify you and  
the NRC immediately if we find significant deviations in the course of our  
continuing validation effort. Of course, as you know, our work on all 23  
issues and their collective significance is continuing and will culminate  
in a formal report to you.

Sincerely,

  
\_\_\_\_\_  
Saul Levine  
Vice President and  
Group Executive  
Consulting Group, NUS

  
\_\_\_\_\_  
Larry L. Humphreys  
President  
UNC Operations Division

  
\_\_\_\_\_  
Robert L. Ferguson  
Chairman  
UNC Nuclear Industries

## RESPONSE

ITEM NO.: 12

TITLE: Main Steamline Framing Restraints

### NRC DESCRIPTION OF CONCERN:

As part of the NRC staff's review, the installation and inspection of the main steamline framing restraints above the steam generators was examined to determine if the as-built drawings reflect the actual installation. The NRC staff found no problems with as-built conditions, but found that several bolted connections had not been inspected (or documented) for the framing. The failure to perform (or document) the inspections render the quality of these framing restraints as indeterminate.

Based on discussions with LP&L representatives the staff was informed that the subject inspections are in progress. LP&L shall complete the inspections of the restraints and make the documentation of such inspections available to the staff.

### DISCUSSION:

LP&L has completed the reinspections of the bolted connections. Related documentation is available for NRC review.

Deficiencies in American Bridge Structural Steel installations and documentation were reported to the NRC pursuant to 10CFR50.55(e) on March 29, 1983. The deficiencies were classified as Significant Construction Deficiency (SCD) No. 78 per site procedures for evaluation and control of deficiencies reportable under 10CFR50.55(e). It was discovered that complete documentation did not exist for bolted structural steel connections in the Steam Generator Framing. A review found that the Steam Generator Framing was inadvertently omitted from the scope of SCD No. 78. Nonconformance Report No. 7736 was issued to resolve this deficiency. The plan of corrective action required action in three areas.

First, Quality Control performed a reinspection of connections in the Steam Generator Framing. The inspections were performed and documented in accordance with ASP-IV-129. This procedure was developed under the corrective action stated in the SCD No. 78 report. Deficiency Reports (DR) were generated to document deficiencies or concerns noted in the reinspection. The procedure specifically required documentation and engineering evaluation of inaccessible or partially inaccessible bolted connections. Approximately 850 bolts out of approximately 12000 installed were replaced. Approximately sixty percent of these deficiencies consisted of an inability to readily confirm the required bolting material.

Second, Construction Engineering reviewed the scope of the American Bridge work. This scoping was compared to the reinspections originally performed under SCD No. 78 to assure no other American Bridge work had been omitted from the scope of SCD No. 78. The rescoping of American Bridge work is complete. A comparison of the results of the rescoping of American Bridge work and the reinspections performed under SCD No. 78 showed the Steam Generator Framing (Drawings G-838A and G-839A) was the only structural steel not originally scoped in SCD No. 78.

Third, since Ebasco and Tompkins-Beckwith had previously reworked many of the steam generator framing connections, Ebasco Quality Assurance assembled and reviewed the existing installation documentation. This action was concurrent with the reinspection effort. As deficiencies were noted during reinspection, Ebasco Engineering researched the existing documentation to determine if Ebasco or Tompkins-Beckwith had reworked the connection. If rework was performed by Ebasco or Tompkins-Beckwith, their respective installation records were used in the evaluation and disposition of the deficiency.

CAUSE:

A review was conducted to determine the cause of the omission of the Steam Generator Framing from the reinspections under SCD No. 78. It was found that the Quality Assurance Installation Review Group (QAIRG) had noted the need to review the installation documentation for the Steam Generator Framing. At the time of initiation of SCD No. 78, Ebasco and Tompkins-Beckwith were working on this steel in the course of normal construction activities. It was decided to delay review of the documentation for the framing until after these contractors had completed their work. Reinspection under SCD No. 78 was not practical at that time due to the large amount of work then in progress in this area. This item was not entered in the appropriate tracking system to ensure a follow-up review of those American Bridge connections not reworked by Ebasco and Tompkins-Beckwith.

GENERIC IMPLICATIONS:

A review was made of the process of the scoping and closeout of SCD's. Existing procedures require the scope of SCD's to be defined in reports submitted pursuant to 10CFR50.55(e). To assure the accuracy of the scope and completion of corrective actions for SCD's, corrective actions are addressed below.

SAFETY SIGNIFICANCE:

Corrective action for the Steam Generator Framing has been completed, with the exception of the coatings on the newly installed bolts. On that basis, the Steam Generator Framing is not a constraint to fuel load or power operation.

CORRECTIVE ACTION PLAN/SCHEDULE:

Reinspection and corrective action for the Steam Generator Framing has been completed, with the exception of coatings on the newly installed bolts. Coating work is scheduled for completion prior to fuel load. All connections have been accepted and the supporting documentation has been reviewed and accepted.

To preclude recurrence of similar problems on open SCD's, a review has been performed by Ebasco Quality Assurance to assure the scopes of the SCD's are accurate. The results of this review will be provided to Engineering for review and comment. This scoping will be included in the SCD package.

Prior to closure of the SCDs, corrective actions will be reviewed to assure all items within the scope of the SCDs have been addressed. Deficiencies noted will be documented and resolved prior to closure of the SCDs.

A review by Quality Assurance, Engineering, and Construction will be performed for future SCDs to identify and assure the completeness of their scope when the deficiencies are determined to be significant. This scope will form the basis of review at closure to assure requisite corrective actions have been completed.

REFERENCES:

- a) SCD 78 Documentation Package.
- b) American Bridge Contract.
- c) Procedure ASP-IV-129

## RESPONSE

ITEM NO.: 13

TITLE: Missing NCRs

### NRC DESCRIPTION OF CONCERN:

During the NRC's review of Ebasco's NCR Processing System the card index file of NCRs was examined and the staff noted that there are missing reports in the consecutively numbered NCRs. Specifically W3-27, 814, 859, 981, 1053, 1102, 1109, 1228, 1349, and 1438 are missing from your card index file. Others were also noted to be missing from the Ebasco QA vault.

LP&L shall (1) obtain the missing NCRs, explain why these NCRs were not maintained in the filing system, review them for proper voiding, and (2) assure that when an issue is raised to an NCR, it is then properly filed for tracking and closure.

### DISCUSSION:

An overall accountability review was conducted of closed or voided NCRs (both site and Ebasco New York Office (NYO) issued). In certain cases NCR numbers were assigned and the associated NCRs were cancelled or voided; in other cases the investigation has concluded that NCR numbers within the sequential numbering of Ebasco site issued NCRs were not assigned to an NCR. The review described below substantiates that Ebasco NCRs have been properly accounted for.

The review compared information from the NCR tracking mechanisms described below with the NCR card index files located in the Site QA Records Vault in order to identify additional closed or voided NCRs that were not on file in the vault. Emphasis was placed on NCRs which were indicated by the tracking mechanisms as being void. For each case in which it was determined that an index card was not on file, but for which the corresponding NCR record (original or copy) was actually located on file in the vault, an appropriate index card was prepared and filed. For each case in which neither index card nor a corresponding NCR record (original or copy) was located on file in the vault, a review was performed to either obtain the missing NCR or determine if it was ever issued.

Based on advice by the NRC given to LP&L at a public meeting held in Bethesda, Maryland on August 7, 1984, an additional review for accountability of all Mercury NCRs, as described in CORRECTIVE ACTION, is also being conducted.

### Background

Until June, 1979, Ebasco Site QA utilized a manual tracking log for NCR number assignment and tracking purposes. A sample of this log is included as Attachment 1. At that time, Ebasco QA commenced using a tracking card system for number assignment and tracking. A sample of a tracking card is included as Attachment 2. NCRs which were issued thereafter were monitored via the tracking card system. Each such card tracks the location of the NCR original at any time during the processing cycle by identifying the specific individual to whom it is assigned as well as the specific NCR transmittal memorandum which routed the NCR to the individual. In addition to this system, Ebasco Site QA began utilizing a computerized Master Tracking System (MTS) as a secondary tool for tracking NCRs in the 1980 timeframe. The card index file, referred to in the concern, is an index card system which is located in the QA records vault and is used to locate documents contained in the vault.



NCRs Issued By Ebasco Site QA

The following is a summary of the review conducted for accountability of Ebasco site-issued NCRs.

The review encompassed over 7600 NCR numbers. The following is a summary of the review results which specifically address those NCRs cited by the NRC as well as those identified by the review as being voided, and those NCR numbers which were unassigned.

1. Four NCR numbers cited by the NRC and one additional NCR number (W3-963) were not entered in the card index file but were entered in the manual log with a general subject and with a void and/or void date notation. Copies of NCRs with these numbers have not been found. Our investigation (see Attachment 3) provides us with high confidence that these five NCRs were not issued.

NCR Nos: W3-859  
W3-963  
W3-981  
W3-1053  
W3-1109

2. Four NCR numbers cited by the NRC were not entered in the card index file but were entered in the manual log with a general subject and with a void and/or void date notation. Original copies of the associated NCRs were not found; duplicate copies have, however, been found and designated as duplicate originals. Our investigations (See Attachment 3) conclude that these NCRs were properly voided. A card index corresponding to each of these NCRs is now on file in the QA records vault.

NCR Nos: W3-814  
W3-1102  
W3-1228  
W3-1349

3. The original copy of NCR W3-27 was and is located in the appropriate file in the QA records vault. The manual tracking log properly indicates it as voided (See Attachment 3).
4. The NCR W3-1438 record, which pertains only to non-safety related items, had been properly renumbered to indicate a non-safety related designation and was and is located in the appropriate file.
5. The investigation provides us with high confidence that the below listed fifteen NCR numbers within the sequential numbering of Ebasco site-issued NCRs have not been assigned to an NCR.

NCR Nos: W3-228  
W3-2016  
W3-5026  
W3-5080  
W3-5287  
W3-5361

W3-5570  
W3-5793  
W3-6068  
W3-6098  
W3-6542  
W3-6646  
W3-6724  
W3-6749  
W3-6900

In the case of NCR W3-228, the manual tracking log shows the NCR number lined out and NCR number W3-211A inserted. The review has determined that the nonconforming condition described on the W3-228 entry had actually been previously documented by NCR W3-211. The review also shows that W3-211 was superceded and closed by issuance of W3-211A, which corresponds to J. A. Jones NCR W3-131A. This was substantiated by a review of W3-211A. The sketch attached to W3-211A indicates it to be W3-228. Further, the sketch and engineering evaluation provides the exact description noted on W3-211A. In summary, the review concludes W3-228 was issued under the same nonconforming description as NCR-W3-211. When this was discovered, NCR-W3-211 was superceded by W3-211A which is the same NCR as W3-228.

In one instance (W3-2016), the Ebasco Site QA NCR file card indicates that the NCR was voided and refers to another NCR (W3-2026) which the investigation verified actually tracked the non-conforming condition.

For the remaining thirteen numbers listed above, it was ascertained that no cards for these numbers were in the Ebasco Site QA NCR tracking card files. In addition, there were no NCR card index files for any of these numbers on file in the Site QA records vault. A check of both the open and closed NCR files of the computerized Master Tracking System (MTS) revealed that none of these numbers had ever been entered into MTS. These particular numbers would have been assigned in 1982 or 1983. A review of the Ebasco Site QA transmittal logs revealed that no entries were made relative to any of these numbers. Ebasco Site QA has utilized uniquely numbered transmittal memoranda to forward NCRs for dispositioning and filing purposes. Based upon the results of this review, it has been concluded that NCRs with any of these numbers have probably not been issued. In order to provide additional clarification with regard to unassigned numbers, an entry has been placed into the Ebasco Site QA NCR tracking card file for each of these numbers which indicates that the number has not been assigned an NCR.

#### NCRS Issued By Ebasco New York Office QA

In addition to the review of site generated NCRs and NCR numbers, a review of the 659 NYO issued NCRs was undertaken to determine if numbers were missing from the sequence in the QA Records Vault Index File for closed or voided NYO NCRs. The following missing numbers were identified in the QA Records Vault Index File of NYO generated NCRs: NCR 199, 204, 483, 489, 543, 579, 642.

A review of the NYO NCR Log and other QA Records indicates that the missing numbers in the QA Records Vault Index File were appropriate as no NCR was issued for the involved items. All the above items were voided or cancelled prior to issuance of a Nonconformance Report and had been so noted in the NYO Log. The specific NYO NCRs listed above are discussed individually in Attachment 4.

#### CAUSE:

The cause for the situation described in items 1 and 2 for site-issued NCRs was the manner in which NCRs were logged and tracked prior to June 1979. The situations described in items 1,2,3 and 4 are not indicative of any loss of accountability. The NCRs that were voided or cancelled had been so noted in the site manual log. It is recognized that the manual log used until June 1979 provided less information with regard to the location of an NCR at any point in time than the current system. The nine NCR numbers mentioned in items 1 and 2 were issued before instituting the tracking card system and MTS.

The probable cause for the situation described in Item 5 is that, from late 1982 to September 1983, Ebasco QA Engineers were co-located with Mercury Company on-site in a "satellite" office in the Mercury complex. In this time frame, when a Mercury NCR was generated and assigned a unique Mercury NCR number, the "satellite" office Ebasco QA engineer would request an Ebasco NCR number by telephone to assign to the Mercury NCR. This was in contrast to normal practice of assigning a number when the Ebasco NCR was written. It is likely that in some instances this request would be duplicated by another Ebasco QA Engineer, perhaps on second shift. The net result would be that two Ebasco NCRs would be issued to address the same Mercury NCR. One Ebasco NCR thus would be used; one would not. This situation was later corrected by assigning a block of Ebasco NCR numbers for use by the "satellite" office.

This hypothesis is supported by the fact that in the cases of three of the NCR numbers mentioned, it has been determined that these numbers were used to address specific Mercury NCRs. The nonconforming conditions described by these Mercury NCRs, however, were addressed by other Ebasco NCRs.

#### GENERIC IMPLICATIONS:

The review and investigation of the more than 8200 closed or voided NCRs has concluded that all are accounted for. In addition, the fact that all of the NCRs described in Items 1, 2 and 3 for site-issued NCRs were issued prior to the establishment of the improved tracking system indicates that the current system has provided improved control.

#### SAFETY SIGNIFICANCE:

The review and investigation has concluded that all closed or voided NCRs are accounted for. On this basis, there is no recognized reason that this issue should constrain fuel load or power operation.

#### CORRECTIVE ACTION PLAN/SCHEDULE:

A review for accountability of all Mercury NCRs is in progress, including voided and administratively closed NCRs. The review will also determine if any dispositions of Mercury NCRs refer to Ebasco NCRs which the completed review has determined were never issued. This effort will be completed and resolved prior to fuel load. The results of this effort will be available for NRC review.

In addition to the measures already established (tracking card system and MTS), additional instructions and measures provide added assurance that NCRs are properly filed for tracking and closure. QAI-031 Revision 0 was issued by Ebasco Site QA on February 20, 1984. It contains detailed requirements for the proper closure (including closure by voiding) of NCRs and their subsequent transmittal to the Site QA records vault. NYO Procedure QAP-3 (Review of nonconformances) was revised to address voiding of NCRs. The procedure revision was completed on 07/20/84. Implementation of these requirements will provide better assurance that the remaining and future Ebasco NCRs are properly processed, closed, and filed. Reviews are being performed periodically by LP&L QA to verify the proper implementation of requirements.

It should be noted that LP&L has converted to operating procedures under which non-conforming conditions are identified as a Condition Identification Work Authorization (CIWA). This will be developed in detail when dealing with the collective significance of the 23 issues and programmatic changes stemming therefrom.

ATTACHMENTS:

1. Sample Manual Log Sheet
2. Sample Tracking Card
3. Site NCRs
4. NYO NCRs

REFERENCES:

None

ATTACHMENT 1

NONCONFORMANCE REPORT NO.	GENERAL SUBJECT	DESCRIPTION BY		RECOMMENDED DISPOSITION BY		EVALUATED DISPOSITION BY		Q A RIF DATE	REMARKS
		NAME	DATE	NAME OR ORGANIZATION	DATE	NAME	DATE		
W3-1453 6/18	1 ea. Mesh 304 Fiber w/ Bridge T 304155	Rah	<del>6-18</del> 6/27	<del>MacBeath</del> MacBeath	10/30/79 11/4/79	A. L. ...	12/7/79	2/8/80	K. W. ... Vault
W3-1454 NISCO-035	Stop A for pump 1A	Dan Shel	6-7-79	J. Stungis	6-7-79	J. Freshour	6/28/79	7/31/79	superseded by 1454 R/1 Vault
W3-1455 NC-176	Fuel Pool Heat Exchanger.	D. Lashley	6-14-79	C. Saurice	6-14-79	S. Venkatesh	7/12/79	7/11/80	CA Vault
W3-1456 NISCO-037	Spool 1404-3	Dash SHAH	6-18-79	J. S. Stungis	6-19-79	J. Freshour	7/12/79	7/13/80	superseded by Rev. 1. all under Vault
W3-1457 FIM W3-	Box RB145-PA, XFMR MOD. 52 36B, Conduits	C. E. Ferguson	6-19-79	R. L. Hadley <del>to ...</del>	6-19-79 9-11-79	W. ... D. ... P. ... M. ...	9-11-79 9-25-79 12-11-79 2-13-80	3/14/80	3-13-80 Vault
	33142-SA, 34408-SA, 33143-PA								
W3-1458 NISCO-038	REACTOR COOLANT SYSTEM STOP A	C. Van Dyke Reed	6/20/79	C. Van Dyke Reed	6/20/79	Y. Mang	6/26/79	9-18-79	3/13/80 Vault
W3-1459 JAS-W3-550	Misplaced and omitted rebar	C. Goldman	6-15-79	E.M. Woolery	6-15-79	sent to ... Hubert Loi ET			5 Horton 4-3-80
W3-1460 JAS-W3-551	Billets in concrete walls	C. Goldman	6-21-79	E.M. Woolery	6-21-79				5 Horton 4-3-80
W3-1461 NISCO-036	Pump 1B internal	Dash Shah	6-15-79	J. Stungis	6-18-79	P. Harrington	7/20		CA 3/13/80 Vault
W3-1462 F.M W3-151	Cable Entrance stop of ...	C. Ferguson	6-19-79	R. Hanley W.D. Lamson	6-19-79			6/14/80	3-13-80 Vault

ATTACHMENT 2

NCR#	SUS#	SUBJECT	DESC BY	INPUT DATE	PO	ITEM#
W3-7768	56A	Support BMRR-3138 REF: DN SQ-3087	F. Clawson	6/14/84	N/A	0001
Ebasco						

TREND CODE 4200.00.62

LETTER#	DATE	RESPONSIBILITY	DUE DATE	STATUS
	6/15/84	F. Clawson	none	in process
W3NCR-21255	6/18/84	U. Quinby/M. McGrath	N/A	RD
W3NCR-21303	7/3/84	U. Quinby/M. McGrath	N/A	CA
W3NCR-21393	8/15/84	CLOSED on 8/15/84		



ATTACHMENT 3

SITE NCRS

NCR-W3-27

The original NCR-W3-27 record was already in the appropriate file in the W3 Site QA records vault even though a corresponding index card was not on file. An index card for this NCR has been prepared and is now on file in the W3 Site QA records vault. NCR-W3-27 was voided by the Ebasco QA Site Supervisor on February 17, 1976. It has been determined from the review of NCR-W3-27 and supporting documentation that the voiding of this NCR is both justified and properly documented.

NCR-W3-814

The original NCR-W3-814 record could not be located in the W3 Site QA records vault. However, a copy of this NCR was located and has been designated as the duplicate original. An index card for this NCR has been prepared and is now on file in the W3 Site QA records vault. The disposition to void NCR-W3-814 was approved by both Ebasco Engineering and the Ebasco QA Site Supervisor, and the NCR was closed accordingly on March 31, 1978. It has been determined from the review of NCR-W3-814 and supporting documentation that the voiding of this NCR is both justified and properly documented.

NCR-W3-859

The NCR log entry for NCR-W3-859 indicates a general subject and void date only. The entry does not identify either a preparer or date prepared. Additionally, a review of the Ebasco Site QA transmittal log revealed that no entries were made relative to this NCR. (Since the beginning of project construction, Ebasco Site QA has forwarded NCRs for dispositioning and for filing as records by use of uniquely numbered transmittal memorandums.) A search of relevant files in the Site QA records vault and at other W3 Site locations was unable to locate an NCR with number W3-859. As a result of the investigation, LP&L has high confidence that NCR-W3-859 was not issued.

A review of documentation pertaining to Ebasco QA audit and surveillance activities relevant to the timeframe and general subject of the entry was performed. The timeframe of the entry was established as being between March 20 and March 23, 1978 (The previous entry (NCR-W3-858) is dated March 20, 1978 and the void date for NCR-W3-859 is indicated to be March 23, 1978). The general subject description of the entry is indicated as "Erection of Plant Process Piping".

It was discovered that Ebasco Site QA had performed an audit of the piping contractor's site welding program between March 16 and March 20, 1978. Audit Report No. WO-78-3-1 was issued on April 13, 1978 and identified four findings which were detected during the audit. It has been concluded that the auditor presented one or more of the audit findings to Ebasco Site QA management for evaluation as to whether they should be identified on an NCR. Anticipating that an NCR would probably be issued, an entry in the NCR log was recorded in order to obtain an NCR number. However, since the findings were programmatic in nature, Ebasco Site QA management apparently determined that an audit report (rather than an NCR) was the appropriate document on which the findings should be identified.

ATTACHMENT 3  
(continued)

The review of audit and surveillance documentation did not reveal any other activities performed within the timeframe discussed above which could be construed as being even remotely relevant to the general subject description of the NCR log entry for NCR-W3-859.

The findings documented in Audit Report WO-78-3-1 were programmatic in nature and appropriately documented as audit findings. Appropriate corrective actions were taken by the contractor and verification of corrective action completion was properly performed and documented by Ebasco Site QA.

NCR-W3-963

The Ebasco Site QA NCR tracking log entry for NCR-W3-963 indicates that the NCR was issued to upgrade Gulf Engineering NCR 086A. The entry indicates that Gulf Engineering had described the nonconforming condition and a recommended disposition on June 22, 1983, but it does not indicate that the Gulf disposition was ever evaluated by Ebasco. In addition, Ebasco QA made an entry on January 25, 1979 to indicate that the NCR had been voided.

Further investigation revealed that Gulf Engineering NCR 086 had been previously upgraded to Ebasco NCR-W3-945 on June 12, 1978. Gulf had provided a recommended disposition for the identified condition and Ebasco had approved the disposition on June 16, 1978. However, on June 22, 1978 Gulf annotated Block IV of their copy of NCR W3-945 with the wording "Refer to NCR 086A for re-evaluation of disposition" and annotated the Gulf NCR log entry corresponding to Gulf NCR 086 with the wording "See NCR 086A dated 6/22/78". Further, on June 23, 1978, Gulf deleted their annotation in Block IV of their copy of NCR W3-945, which had been made on the previous day and added the annotation "Aux. skid aligned with Emerg. Gen. and new holes drilled in accordance with disposition".

It appears that Gulf had been planning to recommend another disposition for NCR W3-945 (Gulf NCR 086) by means of a supplement to Gulf NCR 086 (Gulf NCR 086A) and had notified Ebasco Site QA accordingly in order to obtain a corresponding Ebasco NCR number. Ebasco Site QA had assigned Ebasco NCR number W3-963 to a Gulf NCR 086A and made a corresponding entry in the Ebasco Site QA NCR log, with the understanding that Gulf would be providing the NCR description and recommended disposition. However, Gulf apparently had decided to implement the approved disposition to NCR W3-945 (Gulf 086) rather than to propose a revised disposition via Gulf NCR 086A, which was never issued.

The former Gulf employee, who made the annotations on the Gulf NCR log and Gulf copy of NCR-W3-945 (Gulf NCR 086), has documented by letter (Gulf Engineering Co. QA-3912, 7/2/84) that a Gulf NCR 086A was not issued. If NCR 086A was not issued, then a corresponding Ebasco NCR-W3-963 would not have been issued. Ebasco Site QA was unaware that Gulf had decided not to issue Gulf NCR 086A and therefore, did not void the NCR-W3-963 entry in the Ebasco Site QA NCR log until several months later.

In addition, a review of the Ebasco Site QA transmittal log revealed that no entries have ever been made relative to this NCR. A search of relevant files in the W3 Site QA records vault and at other W3 Site locations was unable to locate an NCR with number W3-963.

ATTACHMENT 3  
(continued)

As a result of the evaluation, it has been concluded that an NCR-W3-963 was not issued.

NCR-W3-981

The NCR log entry for NCR-W3-981 includes entries only for a general subject, a preparer, and a date prepared. The entry also indicates that NCR-W3-981 is "void". The entry in the general subject block refers to a specific heat number, type, and size of welding electrode. The preparer is indicated as the Ebasco QA Site Supervisor at the time, and the date of preparation is indicated as July 18, 1978. Additionally, a review of the Ebasco Site QA transmittal log revealed that no entries have ever been made relative to this NCR. A search of relevant files in the W3 Site QA records vault and at other W3 Site locations was unable to locate an NCR with number W3-981.

A review of documentation on file, applicable to the heat number of welding electrodes described in this NCR log entry, revealed that no Discrepancy Notices or Deficiency Reports pertaining to that heat were issued. However, the review did reveal that the manufacturer of these electrodes had submitted a corrected certified material test report for that heat on July 19, 1978. The certification was corrected to add the manufacturer's ASME Section III Quality Systems Certificate number and expiration date and to add a statement certifying that the material was manufactured in accordance with the requirements of Section III Division 1 Subsection NCA-3800 of the ASME Code. The corrected certification was submitted to Ebasco Site QA on July 21, 1978.

As a result of the evaluation, LP&L has high confidence that NCR-W3-981 was not issued. Ebasco Site QA had anticipated an NCR, to identify deficiencies in the original certified material test report which had been shipped with the welding electrodes, would be necessary and a log entry was made. Prior to issuance, however, corrected certification was received which resolved Ebasco Site QA concerns and the NCR was not issued.

NCR-W3-1053

The NCR log entry for NCR-W3-1053 includes entries only for a general subject, a preparer, and a date prepared. It also indicates that NCR-W3-1053 is "void". A review of the Ebasco Site QA transmittal log revealed that no entries were made relative to this NCR. A search of relevant files in the W3 Site QA records vault and at other W3 Site locations was unable to locate an NCR with number W3-1053.

A review of Ebasco Receiving QC Discrepancy Notices, which were issued around the same timeframe as the NCR log entry date (September 25, 1978), was conducted. This review revealed that Ebasco Receiving QC had issued a DN MC-1681 on September 21, 1978. DN MC-1681 identified deficient tack welds on two pipe supports for the reactor coolant pump (the NCR log entry for general subject indicates "Reactor Coolant Pump"). A review of DN MC-1681 revealed that

ATTACHMENT 3  
(continued)

it had been submitted by Ebasco Receiving QC to Ebasco Site QA for evaluation of the discrepancy for possible upgrading to an NCR. The Ebasco Receiving QC recommended disposition in Block No. 2 of the DN had been initially documented as "Issue NCR". Ebasco Site QA had initially concurred with this recommendation as evidenced by the NCR log entry of September 25, 1978. However, after further evaluation of the discrepancy, Engineering requirements, and AWS Code requirements, Ebasco Site QA determined that the issuance of an NCR was not warranted. On September 25, 1978, the QA Site Supervisor documented this decision accordingly on the DN. The identified discrepancy was properly processed and resolved via DN MC-1681, which was closed on October 3, 1978.

As a result of the evaluation, LP&L has high confidence that NCR-W3-1053 was not issued. The discrepancy which corresponds to the NCR log entry for NCR-W3-1053 was properly processed resolved, and documented by DN MC-1681.

NCR-W3-1102

The original NCR-W3-1102 record could not be located in the W3 Site QA records vault. However, a copy of this NCR was obtained from another file at the W3 Site. The description of the nonconforming condition, which is documented in Block 1 of NCR-W3-1102, is identical to the condition documented by NCR-W3-1099. NCR-W3-1099 documents an acceptable disposition and corrective action for the nonconforming condition. NCR-W3-1099 was properly closed on January 16, 1979. A copy of NCR-W3-1102, which is designated as the duplicate original record, has been annotated to indicate that it has been voided since it describes a condition already documented in NCR-W3-1099. The duplicate original record of NCR-W3-1102 and a corresponding index card are now on file in the W3 Site QA records vault.

NCR-W3-1109

The NCR log entry for NCR-W3-1109 includes entries only for a general subject, a preparer, and a preparation date. It also indicates that NCR-W3-1109 is "void". A review of the Ebasco Site QA transmittal log revealed that no entries were made relative to this NCR. A search of relevant files in the W3 Site QA records vault and at other W3 Site locations was unable to locate an NCR with number W3-1109.

A review was conducted of Ebasco Receiving QC Discrepancy Notices, which were issued around the same timeframe as the NCR log entry for preparation date (November 2, 1978). This review revealed that Ebasco Receiving QC had issued a DN MC-1738 on October 18, 1978. DN MC-1738 identified damaged E 7018 1/8" covered electrodes which had been received under Purchase Order WP3-1847. This corresponds with the brief description in the log entry for NCR-W3-1109 which states the name of the vendor and the notation: "covered electrodes". It should be noted that Purchase Order WP3-1847 was the only WP3 purchase order issued to that vendor.

An additional concern relative to Purchase Order WP3-1847 was that the vendor did not appear on the Ebasco QA Approved Vendors List, Revision 17, dated June 1, 1978, the applicable AVL revision at the time of the NCR entry. However, it is noted that the actual manufacturer of the subject welding electrodes and the company which certified the material, was included on Revision 17 of the Ebasco QA AVL.

ATTACHMENT 3  
(continued)

Ebasco Site QA anticipated the need for issuing an NCR to address one or both of the conditions described above and the entry had been made in the NCR log book to obtain an NCR number. However, after further investigation into the matter, Ebasco Site QA determined that the issuance of an NCR was not warranted.

As a result of the evaluation, it has been concluded that NCR-W3-1109 was never issued. The discrepant material which was identified by DN MC-1738 was scrapped and removed from the W3 Site in accordance with the approved disposition of the DN. Additionally, Ebasco Site QA had approved Purchase Order WP3-1847 with the rationale that the vendor would be functioning merely as a distributor by supplying materials and documentation that had been provided by the material manufacturer, a vendor approved by Ebasco QA.

NCR-W3-1228

The original NCR-W3-1228 record could not be located in the W3 Site QA records vault. However, a copy of this NCR was obtained from another file at the W3 Site. A copy of NCR-W3-1228, which is designated as the duplicate original record, is now on file in the W3 Site QA records vault. Also, an index card, corresponding to this NCR, was prepared and is now on file in the W3 Site QA records vault. By direction of the Ebasco QA Site Supervisor, NCR-W3-1228 was voided and the condition was re-identified and processed on a Gulf Engineering Discrepancy Report (DR No. 21). The review indicates that NCR-W3-1228 was voided with proper justification and the reported condition was properly processed, corrected, and documented by Gulf Engineering DR No. 21.

NCR-W3-1349

The original NCR-W3-1349 record could not be located in the W3 Site QA records vault. However, a copy of this NCR was obtained from another file at the W3 Site. A copy of NCR-W3-1349, which is designated as the duplicate original record, is now on file in the W3 Site QA records vault. Also, an index card corresponding to this NCR, was prepared and is now on file in the W3 Site QA records vault. It has been determined that NCR-W3-1349 was properly voided, since the same nonconforming condition was processed, corrected, and documented by NCR-W3-1397.

NCR-W3-1438

The original NCR-W3-1438 document, which pertains only to non-safety-related items, had been appropriately renumbered to a non-safety-related designation and was on file in another location at the W3 Site. An index card has been prepared for NCR-W3-1438 and is on file in the W3 Site QA records vault. The index card indicates that the NCR is non-safety related and it has been renumbered as NCR-W3-001 (NNS).

ATTACHMENT 4  
NYO NCRS

NCRS 199 and 204

NCRs 199 and 204 were assigned to purchase order 403502 to cover Qualification Reports that were not reviewed by Ebasco Engineering. Subsequently it came to the attention of the NYO that DEF-78-5-19 identified the same problem as NCRs 199 and 204. Report W3QA-6698 dated 3/22/79 indicates that Rosemount Qualification Report No. 3788 was reviewed without comment and DEF-78-5-19 closed. A formal notice of NCRs 199 and 204 being cancelled was transmitted to the vendor on 4/11/80. Based on the investigation, LP&L has high confidence that NCR 199 and 204 were not issued.

NCR 483

NCR 483 was assigned to purchase order 403501 to cover a hydrostatic test time different from specification requirements. Prior to issuing the NCR, the engineer revised the specification via DCN-ME-109. The NYO Log indicates NCR 483 was not issued and replaced by DCN-ME-109. A formal notice of this fact was transmitted to vendor on 3/6/84.

NCR 489

NCR 489 was assigned to purchase order 403509. The NYO Log indicates a report date of 10/26/79; a description that states "No weld data high probability material is non-critical"; and a notation NCR 489 is Void. A search of relevant documentation in the QA Records Vault, NYO QA Files, NYO Vendor QA Files and order 403509 was conducted. No original or copy of NCR 489 was found. A specific review was made of all VQAR Reports and other relevant correspondence for the 6/79 through 6/80 time frame. The review did not reveal any concern which could be construed as being relevant to the general subject description for log entry NCR 489.

Site QA Records indicate that order 403509 has no outstanding deficiencies. Based on the above, LP&L has high confidence that NCR 489 was not issued and that the void notation in the NYO log is valid.

NCR 543

NCR 543 was assigned to purchase order 403623 to cover short cable lengths. The NYO NCR Log indicates NCR 543 was voided because it was the same as NCR 545. NCR 545 was issued on 10/28/81 and properly dispositioned on 11/9/81. LP&L, therefore, has high confidence that NCR 543 was not issued.

NCR 579

NCR 579 was assigned to purchase order 403640 to cover short cable lengths. NCR 579 was voided and never issued as it duplicated a condition previously described on NCR 573. NCR 573 was issued on 5/10/82 and properly dispositioned on the same day. NCR 579 was not issued and formal notification was made to vendor on 4/22/83.

NCR 642

NCR 642 was assigned to purchase order 403516 to cover a missing shipping/packaging procedure. Prior to initiating the NCR Form, the potential nonconforming condition was resolved by locating the missing document and no NCR was issued.

## RESPONSE

ITEM NO.: 14

TITLE: J. A. Jones Speed Letters and EIRs

### NRC DESCRIPTION OF CONCERN:

During the Ebasco QA review of J. A. Jones Speed Letters and Engineering Information Requests, several items which could affect plant safety were noted. Based on its sample of these actions, the staff does not expect that any of these items will significantly affect plant safety. Nevertheless, the applicant should complete the actions identified in these reviews and issues raised shall be resolved promptly.

### DISCUSSION:

#### 1. J. A. Jones

During the Ebasco Q.A. review of J. A. Jones installation records, references were made in the installation records to information requests. Subsequent to this review, Ebasco Q.A. performed an informal sampling to ascertain whether or not design information had been conveyed using these information requests. Upon finding a number of such cases, all the known information requests and their predecessors, speed letters, were assembled and transmitted to ESSE - Civil Engineering for a complete review which started in January, 1984. Of the approximately 2100 documents, 271 appeared to convey design changes without proper documentation. These 271 have been evaluated and researched on a case-by-case basis. One hundred and four were found to have proper documentation in the form of a FCR, DCN, NCR or specification governing J. A. Jones installations. The remainder have been determined to be acceptable-as-is by way of engineering analysis. As no rework was initiated as a result of this review, there is no impact on plant safety.

#### 2. Other Safety Related Contractors

To determine if other contractors performing safety-related work used design changes conveyed through informal documents such as engineering information requests, a sampling program was developed. Attachment 1 provides a list of safety-related contractors, the approximate number of documents associated with each, the sample size, and the number of questionable items identified.

The guidelines for the sampling program were as follows:

- A. A minimum 10% review of each safety-related contractor's information requests was made on a random basis. For example, T-B numbered their Information Requests (IR) consecutively from 1000 onward. The selected sample might then consist of every IR whose last digit is equal to one i.e. 1001, 1011, 1021. This eliminated bias from the selection process and assured a meaningful cross-section. The only qualifying rule utilized was a reviewer did not review a document in which he participated earlier. If in following the sampling plan, a reviewer identified an item in which he was involved, he proceeded to the next higher item for which he had no involvement.

If the total number of documents for a contractor was equal to or less than fifty, a total scope review was performed. If there was a violation of design control, regardless of its safety significance, the contractor's sample expands to, at a minimum, another 10% with further expansion as deemed appropriate. Exceptions to this sampling program are noted below.

- B. The sampling program is documented using Attachment 2 in the following fashion:

Item 1 - Contractor's name on whose information requests the sample is taken.

Item 2 - The nomenclature used to describe the items being sampled: Information requests - IR; Request For Information - RFI; etc.

Item 3 - The sample is numbered consecutively, i.e. 1, 2, 3, etc. in this column.

Item 4 - Record the number of the document reviewed, i.e. IR 01001, etc.

Item 5 - A brief description of the problem identified or question presented.

Item 6 - A brief summary of the response given to Item 5.

Item 7 - Categorization for sample trending (optional)

Item 8 - Justification for response given i.e., FCR, DCN, NCR, SPEC, or other explanation.

Item 9 - If the sample reviewer is not certain if the item affected plant safety, ESSE evaluates the specific case to determine whether or not a design change should have been documented.

- C. If any contractor items are identified which indicate a violation of the design control program, they are reviewed, resolved, and documented in accordance with approved procedures.



The following is a brief summary of results on the sampling program for the safety related contractors other than J. A. Jones:

A. Contractor: Tompkins-Beckwith

Total number of Documents: Approximately 6600  
Sample Size: 660

RESULTS:

The sampling has been completed. There have been no cases found where design changes were conveyed on the information request without proper documentation.

CONCLUSION:

No further action required

B. Contractor: Fischbach & Moore

Total Number of Documents: Approximately 6400  
Sample Size: 643 (To be expanded)

RESULTS:

The initial sampling has been completed. While most of the requests do not convey design changes, there were ten cases of design changes being made.

CONCLUSION:

Of the ten cases found, none were determined to be of safety significance. The information conveyed did, however, violate the design control program so an additional sample is being taken. The additional sample size will be ten percent since the number of design control violations was small (1.6% of the sample) and none had safety significance. The second sample is scheduled for completion by September 15, 1984.

C. Contractor: Mercury

Total Number of Documents: 3050  
Sample Size: 305 (To be expanded)

RESULTS:

Upon completion of the sample, sixteen of the Mercury requests for engineering information were determined to have transmitted design data without documenting the change on a FCR or DCN. Engineering has evaluated these changes to be acceptable as is. Fifteen of these 16 requests concern overspans necessitated by either the passage of tubing through walls or thermal expansion. Given the nature of the changes, it has been concluded that it was acceptable for a construction engineer to have dispositioned these items. The design criteria has not been invalidated, and there is, therefore, no safety significance.

CONCLUSION:

The cases found, however, were violations of the design control program. Given the number of violations (5.2% of the sample) and the other concerns related to the Mercury Program, LP&L has decided to perform a total scope review of the Mercury information requests. Since there have been no findings of safety significance, and since 15 of the 16 items identified were of the same type and within design criteria, completion of the review poses no constraint to fuel load. This effort will be completed by November 15, 1984.

D. Contractor: NISCO

Total Number of Documents: 559

Sample Size: 56

RESULTS:

The sampling has been completed. No cases have been found where design changes were conveyed on the information request without proper documentation.

CONCLUSION:

No further action required.

E. Contractor: Gulf Engineering

Total Number of Documents: 603

Sample Size: 61

RESULTS:

The sampling has been completed. There have been no cases found where design changes to safety-related equipment were conveyed on the information request without proper documentation. There were three cases where design changes were conveyed on non-safety related equipment. These changes were modifications of material specifications and clarification of grouting details. None of these modified the design.

CONCLUSION:

No further action required.

F. Contractor: American Bridge

Total Number of Documents: 775

Sample Size: 775

RESULTS:

The initial 10% sample identified eight cases of design control violations. None of these required rework or were of safety significance. However, in light of the relatively large number of violations (10% of the initial sample) and other concerns related to the American Bridge program, LP&L decided to perform a full scope review of American Bridge information requests. This subsequent review identified sixty-one additional design control violations. None were evaluated to have safety significance. There were some additional concerns, however, identified as a result of this review.

One of these involves certain surface mounted anchor plates installed by American Bridge for which complete documentation has not been found to date. The other item concerns work which was modified from a bolted to a welded connection. The resolution of these two concerns, along with any rework, will be dispositioned and documented via open Significant Construction Deficiency No. 78.

Two rework cases have been identified. The rework involved is minor and the existing condition, if left uncorrected, would have posed no safety significance.

CONCLUSION:

Additional actions being taken are described above.

G. Contractor: GEO

Total Number of Documents: 46

Sample Size: 46

RESULTS:

The sampling has been completed. There have been no cases found where design changes were conveyed without proper documentation.

CONCLUSION:

No further action required.

H. Contractor: B&B

Total Number of Documents: 541  
Sample Size: See Results Below

RESULTS:

A sample of this contractor's information requests was not performed for the following reasons. The design specification governing B&B work provides several alternatives to accomplishing their work. B&B's information requests pertained to definition of the work scope and the application of these alternatives. No design changes were conveyed.

CONCLUSION:

No further action required.

I. Contractor: Waldinger

Total Number of Documents: 1178  
Sample Size: 117

RESULTS:

The sampling has been completed. There have been no cases found where design changes were conveyed without proper documentation.

CONCLUSION:

No further action required.

J. Contractor: Fegles

Total Number of Documents: 42  
Sample Size: 42

RESULTS:

A total review of the Fegles information requests was performed. Eight cases were found that conveyed design changes. None had safety significance. Engineering has evaluated all to be acceptable as is without any rework.

CONCLUSION:

No further action required.

K. Contractor: Slime

Total number of documents: 118  
Sample Size: 12

RESULTS

The information requests submitted by Slime total 118 as of April 14, 1984. From the review, it has been concluded that no design changes have been conveyed without proper documentation.

CONCLUSION:

No further action required

L. Contractor: Ebasco Construction - Mechanical Equipment & Piping

Total number of documents: Approximately 105  
Sample Size: 105

RESULTS:

During the initial 10% sampling (10 documents), it was determined that several of these documents were still in process and had not been answered to date. The sample size was then increased to 28. Of the 28, seven (7) were still to be answered, eleven were backed up by appropriate documentation, and seven (7) were deviations reported via discrepancy notices (DN's) which were evaluated via information requests by Engineering to accept as is. The remaining three were deviations from design for which there was no back-up documentation. Engineering has evaluated these three to be acceptable as-is without rework.

CONCLUSION:

Since the number of information requests yet to be answered diminished the sample size and three of the 21 (14 percent) answered information requests contained undocumented dated changes, a complete review of all documents in this category has been made. This review produced the following results: 45 were backed up by appropriate documentation; 23 were voided or unanswered and 37 were deviations from design for which a design change had not been issued. The 37 deviations were responded to by the appropriate organization, i.e., design engineering. Thus there is no safety significance.

M. Contractor: Ebasco Construction - Electrical

Total number of documents: Approximately 1500  
Sample Size: 150

RESULTS:

This sampling has been completed. There have been no cases found where design changes were conveyed without proper documentation.

CONCLUSION:

No further action required.

N. Contractor: Ebasco Construction - Instrumentation

Total number of documents: 540  
Sample Size: 54

RESULTS:

This sampling has been completed. There have been no cases found where design changes were conveyed without proper documentation.

CONCLUSIONS:

No further action required.

O. Contractor: Ebasco Construction - Pipe Supports

Total number of documents: Approximately 1700  
Sample Size: 174

RESULTS:

The sampling has been completed. There were no cases found where design changes were conveyed without proper documentation. There were ten deviations reported via discrepancy notices (DN's) for which information requests were written subsequent to the DN issuance. All were evaluated via information requests by engineering to be acceptable as is. None were of safety significance.

CONCLUSION:

No further sampling was performed as the items identified were all of the same nature and were a subset of information requests pertaining to one nonconformance report. As this was an homogenous set of documents traceable to one source, further sampling was not performed. In addition, the as-building program under which Tompkins-Beckwith performed their work provided appropriate documentation for deviations from design under the design control program. Thus, no further action is required.

P. Contractor: Ebasco Construction - Civil

Total number of documents: Approximately 20  
Sample Size: 20

RESULTS:

With the sample completed, two cases of undocumented design charges were found. These changes have been evaluated by Engineering to be acceptable as-is without rework.

CONCLUSION:

None of the design changes conveyed by informal documents have safety significance. No further action required.

CAUSE:

Lack of an appropriate procedure for handling informal information requests prior to March 1979, and inadequate implementation of ASP-IV-56 (Control of Information Requests) after its issuance in March 1979 was the cause of this concern. The procedure specifically limits the use of information requests to a) clarification of construction details, b) directives to clear interferences, or c) directives to install and document in accordance with redline procedures. It requires requests for information which require a design change to be responded to with the number of the appropriate document and the expected date of issue.

GENERIC IMPLICATIONS:

This issue has been treated generically. The review conducted included a minimum 10 percent sample of informal information requests of all contractors who performed safety-related work at Waterford-3. Some minor documentation problems exist and are being tracked. The review and evaluation of the design changes conveyed by the informal information requests, without appropriate documentation, indicates that none adversely affected safety. The review only identified one contractor, American Bridge, where rework was appropriate. This contractor, however, was subject to the full scope review.

SAFETY SIGNIFICANCE:

The content of the J. A. Jones changes consisted typically of relocations of embedded items to clear interferences and adding rebar splices. The review has not found any changes that affect plant safety.

The findings on the other contractors relate to proper documentation. There are no findings which would affect plant safety.

On this basis, LP&L concludes that this concern should not constrain fuel load or power operation.

CORRECTIVE ACTION PLAN/SCHEDULE:

Further sampling of Fischbach and Moore and Mercury is ongoing as stated above. The additional 10% sample of Fischbach and Moore will be completed by September 15, 1984. The review of all remaining Mercury information requests will be complete by November 15, 1984.

Individual nonconformance reports will be written for a contractor if required to document the conditions found during the sampling of that contractors information requests and track the information and approval of corrective action. The nonconformance reports are to be written by September 30, 1984.

To preclude recurrence of this concern, Ebasco will further instruct those individuals involved in the implementation of ASP-IV-56 (Control of Information Requests Between Ebasco and Site Contractors). Emphasis will be given to the appropriate documentation of design changes. Instruction is scheduled to be complete by September 15, 1984.

In addition, the Station Modification process, now in affect at Waterford (Plant Operating Manual Procedure PE-2-006), defines the method for accomplishing hardware modifications and the updating of documentation to reflect as-built conditions from initiation through to closure. Use of a Detailed Construction Package Change (DCPC) document is also discussed in the procedure. A DCPC is a formal request for change when work associated with a station modification cannot be accomplished in accordance with the detail construction package instructions which requires the responsible engineer's approval prior to implementation. Subsequent to implementation, the DCPC will be incorporated as a revision to the Station Modification Package.

ATTACHMENTS:

- 1) Summary of Review of Safety Related Contractors
- 2) Sample Program Documentation Form

REFERENCES:

- (1) Ebasco Procedure ASP-IV-56, Control of Information Requests between Ebasco and Site Contractors.



ATTACHMENT 1

SUMMARY OF REVIEW OF SAFETY RELATED CONTRACTORS

SAFETY RELATED CONTRACTORS	APPROXIMATE TOTAL QUANTITY OF DOCUMENTS	SAMPLE SIZE	ITEMS (1) IDENTIFIED	SAFETY SIGNIFICANCE
Tompkins-Beckwith	6600	660	0	0
Fischbach & Moore	6400	643 (2)	10 (1.6%)	0
Mercury	3050	305 (3)	16 (5.2%)	0
Nisco	559	56	0	0
Gulf Engineering	603	61	0	0
American Bridge	775	775	69 (8.9%)	0
Nooter	N/A	N/A	N/A	0
Combustion Engineering	N/A	N/A	N/A	0
GEO	46	46	0	0
B&B	541	N/A	N/A	0
Waldinger	1178	117	0	0
Fegles	42	42	8 (19%)	0
CBI	N/A	N/A	N/A	0
Sline	118	12	0	0
<u>Ebasco Construction</u>				
(1) Mechanical	105	105	37 (35%)	0
(2) Electrical	1500	150	0	0
(3) Instrumentation	540	54	0	0
(4) Pipe Supports	1700	174	10 (5.7%)	0
(5) Civil	20	20	2 (10%)	0
TOTAL	23,777	3,166	152 (4.8%)	0

- (1) Items identified is defined as the number of individual information requests which violated the design control program.
- (2) An additional ten percent sample will be reviewed.
- (3) This sample has been expanded to full scope.

ATTACHMENT 2

CONTRACTOR \_\_\_\_\_

DOCUMENT \_\_\_\_\_

ITEM	DOCUMENT NUMBER	DESCRIPTION	RESPONSE	CATEGORY*	JUSTIFICATION	ESSE ** EVALUATION