



UNITED STATES
 NUCLEAR REGULATORY COMMISSION
 REGION V
 1450 MARIA LANE, SUITE 210
 WALNUT CREEK, CALIFORNIA 94596

D. Kirsch

DESIGNATED ORIGINAL

Certified By *[Signature]*
 April 27, 1984

J. D. Schuyler, Vice President
 Nuclear Power Generation
 Pacific Gas and Electric Company
 77 Beale Street
 San Francisco, Ca 94106

Dear Sir:

Enclosed in "Appendix A" is a list of 146 allegations or concerns to be turned over to PG&E for evaluation, investigation and response.

The above mentioned allegations and concerns are identified in "Appendix A" by NRC allegation number and Corresponding Government Accountability Project and Joint Intervenor's petition numbers dated 2/2/84; 2/22/84; 3/2/84; 3/23/84; and 4/6/84. The referenced source documents contain the applicable background information compiled by this office.

For each specific allegation or concern forwarded by this letter, the NRC must be appraised, in writing, of the results of the PG&E investigation, the necessary corrective action, and the expected completion date. We request that your responses be titled with the appropriate allegation or petition number. Your responses will be evaluated by the staff for clarity, comprehensiveness, and substance. You will be advised of the staff's position upon completion of the staff's evaluation. Your written response is required within 30 days of receipt of this letter.

We will be happy to answer any questions you may have regarding this matter.

Sincerely,

[Signature]

T. W. Bishop, Director
 Division of Reactor Safety & Projects

Enclosure: As Stated

8411290605 840427
 PDR ADOCK 05000275
 PDR

"for release to PDR"
 H005
 84-399
 11

LEGEND

APPENDIX A

22 = SS 22

21 = SS 21

IR = Inspection Report

A = The staff has previously addressed the issue

NRC ALLEGATION NUMBER	ALLEGATION SOURCE DOCUMENT						CHARACTERIZATION
	2/2/84 GAP	2/22/84 JI	3/2/84 GAP	3/2/84 JI	3/23/84 GAP	4/16/84 D.Kirsch	
225	52	52					PROCEDURES FOR INSPECTIONS MAY HAVE BEEN AS UNCONTROLLED AS FOR THE WELDS THEMSELVES
227	57	57					WELDS HAVE BEEN REPAIRED WITHOUT REVISING THE RELEVANT DRAWINGS TO NOTE THE DIFFERENCES
234	100	100					PULLMAN'S APPROVED VENDORS LIST IS DEFICIENT IN THAT "MICROSURFACE ENGINEERING" DID NOT HAVE ADEQUATE QA PER MR. HUDSON'S OCTOBER 1981 AUDIT
235	101	101					EFFECTS OF LACK OF "MICROSURFACE ENGINEERING" QA UPON CALIBRATIONS, TOOLS, AND MEASUREMENTS NOT DETERMINED
236	105	105					CONTRACTOR FOLEY DID NOT USE RIGHT PARTS (I.E. BEAM CLAMPS)
237	106	106					WRONG SIZE BEAM CLAMPS USED BY FOLEY TECHNICALLY INADEQUATE
239	112	112					PROCEDURES UNRELIABLE - COPPER AND STAINLESS TUBING INSTALLATION
240	113	113					RESUBMITTED TEST PROCEDURES QUESTIONABLE (TUBING)
241	114	114					WELDING AND NDE PROCEDURES QUALIFIED AFTER THE FACT QUESTIONABLE
242	118	118					NO REJECTION CRITERIA (PIPE RUPTURE RESTRAINT BOLTS)
243	119	119					QA INSPECTORS NOT PROMPTLY NOTIFIED OF SPECIFICATION CHANGES

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	2/2/84 GAP	2/22/84 JI	3/2/84 GAP	3/2/84 JI	3/23/84 GAP	4/16/84 D.Kirsch	
244	123	123					TECHNICIAN NPPR'S REQUIRED FOREMAN APPROVAL
245	124	124					PG&E VOIDED NPPR'S WITHOUT EXPLANATION
246	125	125					CONSTRUCTION PERSONNEL ORDERED NOT TO WRITE NPPR'S
251	139	139					PULLMAN QA HAD TO MEET ITS SCHEDULE WITH INADEQUATE RESOURCES
253	B147						MANAGEMENT DID NOT SUPPLY BLANK DISCREPANCY REPORT FORMS
255	B149						PG&E TECHNICIANS "WERE ROUTINELY DENIED ACCESS TO NECESSARY INFORMATION TO PERFORM THEIR JOBS"
257	B151						TECHNICIANS WERE DENIED CURRENT DRAWINGS AND OTHER REFERENCE MATERIALS
258	152						PG&E FOREMAN PURGED THE TECHNICIANS FILES OF UNCONTROLLED DRAWINGS
259	166						PG&E DOES NOT NOTIFY THE ORIGINATOR OF A DEFICIENCY REPORT THAT A DECISION HAS BEEN REACHED
261	169						PG&E CONTENTION THAT THIS SYSTEM ^{RHR} (LPH) IS NOT SAFETY RELATED IS INCORRECT (BASED ON TMI)
263			180	180			REVISED PULLMAN ESD223 ALLOWS EXTRA WELDINGS NOT REQUIRED BY THE DESIGN, THUS CREATED UNACCOUNTED RESIDUAL STRESS

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264			181	181			THE ABOVE REVISION SUGGESTS QA STANDARDS HAVE COLLAPSED
265			182	182			PG&E ACCEPTED THE ABOVE REVISION OF PULLMAN
266			183	183			PG&E ACCEPTED WELDS THAT FAILED MT
267			184	184			PG&E DIRECTED PULLMAN TO ACCEPT WELDS THAT WERE NOT TESTED PROPERLY
268			185	185			WELD PROCEDURES ARE NOT APPLIED CONSISTENTLY
269			186	186			IGNORANCE OF INSTALLATION PROCEDURES DUE TO MANAGEMENT POLICY
270			187	187			PULLMAN QC MANAGER PROHIBITED INSPECTORS CHECKING A-490 BOLTS CARBON CONTENT SPECIFICATION WHICH IS NOT PART OF INSPECTOR'S JOB
274			191	191			THE ABOVE INDIVIDUAL WAS LAID OFF DESPITE HIS FOREMAN'S REQUEST TO KEEP HIM
278			197	197			PULLMAN QC MANAGER UNSATISFACTORILY DISPOSITIONED A DCN OF UNMARKED TOOLS USED ON STAINLESS STEEL
284			215				THE PLANT IS BEING DESIGNED AND BUILT THROUGH MEMORANDA RATHER THAN UNDER CONTROLLED PROCEDURES (SEE #8)
294			237				FIELD ENGINEERING PERSONNEL ARE CONSISTENTLY UNTRAINED AND ARE NOT CONSISTENTLY KNOWLEDGEABLE ABOUT WELD SYMBOLS

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295			240				THE WORD "TYPICAL" HAS BEEN UTILIZED TOO EXTENSIVELY IN VARIOUS INTERPRETATIONS
352							PG&E'S FAILURE ANALYSIS OF F.W.212 PERFORMED BY PULLMAN
353							INCONSISTANCIES IN THE INSPECTION COVERAGE BETWEEN WELDS F.W.197 AND F.W.212
354							PG&E FAILED TO REPORT WELDING DEFICIENCIES PER 50.55 (e)
355							PG&E FAILED TO REPORT REJECTABLE INDICATIONS STATED IN DR3370 TO NRC
356							A RADIOGRAPHIC LEVEL II INSPECTOR ACCEPTED RADIOGRAPHS BEFORE HE WAS CERTIFIED AND THIS NON-CONFORMANCE WAS NOT REPORTED VIA QA SYSTEM
357							F.W.197 WAS NOT REPAIRED ACCORDING TO THE DIRECTION OF DR 3484. AN INTEROFFICE CORRESPONDENCE WAS USED INSTEAD. INITIATED BY UNQUALIFIED PERSON
358							DR 3484 FAILED TO INCLUDE PROPER WELDING PROCEDURE IN THE RECOMMENDED DISPOSITION
359							CRACK WAS IMPROPERLY REFERRED AS LINEAR INDICATION ON F.W.212, AND PROPER CORRECTIVE ACTION TAKEN IS UNKNOWN
338							FAILURE TO REPORT CRACK ON F.W. 212 TO NRC PER 50.55 (e). CORRECTION TO CRACKS UNDETERMINED
339							Q.A. BREAKDOWN DUE TO FAILURE TO DISCOVER WELDING DEFECTS

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340							FAILURE TO NOTIFY NRC PER 10 CFR 21/50.55 (a) WHEN 100% REINSPECTION OF RADIOGRAPHS REVEALED PREVIOUS MISINTERPRETATION
360					ATT. 12 PAGE 2 PARA 2	3↓	FIVE WELD INSPECTORS WITH LEVEL II STAMPS WITHOUT APPROPRIATE PAPERWORK
361					ATT. 12 PAGE 2 PARA 4		WELDING INSPECTOR NOT CERTIFIED TO CERTIFY OTHER WELDERS
362					ATT. 12 PAGE 3 PARA. 2		WELDERS DID NOT HAVE UNIQUE STAMPS AS REQUIRED BY AWS
363					ATT. 12 PAGE 3		MANAGEMENT ROUTINELY ALLOWED WELDERS TO TAKE REQUALIFICATION TESTS DAILY UNTIL THEY PASSED
364					ATT. 12 PAGE 4 PARA 2		INADEQUATE TRAINING FOR QC INSPECTORS
365					ATT. 12 PAGE 5 PARA 2		TRACEABILITY (HEAT NUMBERS) LOST AFTER MATERIAL
366					ATT. 12 PAGE 5 PARA 3		STAINLESS STEEL T-SECTION OF PIPE WITH A FOUR INCH LINEAR UNDERCUT LEFT UNREPAIRED
367					ATT. 12 PAGE 6 PARA 2		GUIDED BEND TEST MACHINE DID NOT SATISFY AWS REQUIREMENTS CONCERNING TOLERANCES BETWEEN SHOE AND DIE IN THE HYDRAULIC JACK
368					ATT. 12 PAGE 6 PARA 3		QUICK FIXES NOT BEING REVIEWED BY QA AND HAD NO SERIOUS ENGINEERING ANALYSIS
369					ATT. 12 PAGE 7 PARA 1		PROFESSIONAL CODES NOT AVAILABLE FOR RESEARCH

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370					ATT. 12 PAGE 7 PARA 2	UP-TO-DATE COPIES OF QUALITY CONTROL PROCEDURES NOT AVAILABLE	
371					ATT. 11 PAGE 1 PARA 3	QC LEVEL I INSPECTOR QUALIFIED TO ACCEPT <u>WORK</u> WITHOUT A LEVEL II INSPECTOR IN ATTENDANCE	
372					ATT. 11 PAGE 2. PARA 5	LEVEL II QC INSPECTOR SIGNING INSPECTION REPORTS WITHOUT PERSONALLY VERIFYING WELDING	
373					ATT. 11 PAGE 3 PARA 4	QC INSPECTORS WERE NOT GIVEN TESTS ^{AT} THE END OF ON-THE-JOB TRAINING	
374					ATT. 11 PAGE 4 PARA 3	LESS THAN 50% OF WELDING QC INSPECTORS KNEW HOW TO WELD.	
375					ATT. 11 PAGE 5 PARA 2	SUPERVISION FROWNED UPON THE USE OF RED TAGS BECAUSE OF ^{THE} PRODUCTION SCHEDULE	
376					ATT. 11 PAGE 5 PARA 3	MANGEMENT ADVOCATED THAT THE QC INSPECTORS PERFORM "COMPLIMENTARY INSPECTIONS"	
377					ATT. 11 PAGE 5 PARA 4	ELECTRICAL RACEWAY SUPPORT SUPPORTED BY A PIECE OF UNISTRUT THAT HAD BEEN IMPROPERLY CUT AND INSTALLED	
378					ATT. 11 PAGE 6 PARA 2	QC INSPECTOR WAS NEVER PROVIDED WITH THE SUPPORT TO PERFORM HIS DUTIES, NOR PROVIDED WITH ADEQUATE TRAINING	
379					ATT. 11 PAGE 6 PARA 3	LACK OF AN UP-TO-DATE "HEAT NUMBER" LOG	
380					ATT. 12 PAGE 1 PARA 3	LEVEL II INSPECTOR CO-SIGNING LEVEL I WORK WITHOUT LOOKING AT THE WELDS	

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381					ATT. 12 PAGE 2 PARA 1	#2	UP TO 30% OF THE WELD INSPECTORS WERE NOT QUALIFIED	
382					ATT. 10 34		ATKINSON-ILLEGALLY PERFORMED INFORMAL WELD REPAIRS COVERED UP INITIAL DEFICIENCIES WHOSE EFFECTS WILL REMAIN AS PERMANENT HAZARDS PERMANENT	
383					ATT. 10 35		ATKINSON - DURING 1979 THE QA INSPECTION PROGRAM ONLY POORLY ENFORCED THE PREHEAT SPECIFICATION PROGRAM, WHEN AT ALL	
384					ATT. 10 36		ATKINSON - INVESTIGATION OF WELDING PREHEAT TREATMENT ONLY COVERED WORK IN PROGRESS NOT COMPLETED WELDING	
385					ATT. 10 37		ATKINSON - INSPECTOR CONCERNED WITH INADEQUATE PREHEATING OF STEEL GREATER THAN TWO INCHES THICK	
386					ATT. 10 38		ATKINSON - PROBLEM WITH LACK OF WELD ROD CONTROL	
387					ATT. 10 39		ATKINSON - MANAGEMENT INTRODUCED ERRORS INTO THE BLUEPRINTS BY SWITCHING IDENTIFICATION CODE ON BLUEPRINTS AND FAILING TO KEEP TRACK OF CHANGES	
388					ATT. 10 40		ATKINSON - PROPER TORQUING OF BOLTS QUESTION	
389					ATT. 10 41		ATKINSON - THREE TURBINE BUILDING CAISSONS WERE IMPROPERLY INSTALLED	
390					ATT. 10 42		ATKINSON - TENSION CABLES TO ANCHOR TURBINE PEDESTALS INCORRECTLY ANCHORED TO SANDSTONE INSTEAD OF GRANITE	
391					ATT. 10 43		ATKINSON- MANAGEMENT DISPLAYED A LACK OF COMMITMENT OF QUALITY INSPECTION	

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396					ATT.10 27		ATKINSON - WELDERS REWORK CREATED AN UNKNOWN DEGREE OF EXTRA STRESS OF STRUCTURAL WELDS
397					ATT.10 28		ATKINSON - INSPECTORS FOUND IT ALMOST IMPOSSIBLE TO GET UNQUALIFIED WELDERS OFF JOB
399					ATT.10 30		ATKINSON - MANAGEMENT DID NOT SATISFACTORILY ADDRESS REPORTS OF UNDOCUMENTED WELDS
400					ATT.10 31		ATKINSON - TACK WELDING PROCEDURE USED, NOT AUTHORIZED IN APPLICABLE WELD SPECIFICATIONS OR PROCEDURES
401					ATT.10 32		ATKINSON - INFORMAL OR UNDOCUMENTED WELD REPAIRS CREATED MORE DAMAGE THAN EXISTED INITIALLY IN SOME CASES
402					ATT.10 33		ATKINSON - EFFECT OF UNCONTROLLED WELD REPAIRS WAS TO DESTROY WELD IN SOME CASES - CREATED UNEVEN STRESS
403					ATT.10 12		ATKINSON - QA MANAGER DIRECTED QA VIOLATIONS BE INITIALLY REPORTED BY MEMORANDA INSTEAD OF FORMAL NONCONFORMANCE REPORTING SYSTEM
404					ATT.10 13		ATKINSON - MANAGEMENT PREVENTED INSPECTOR FROM INSPECTING SENSITIVE AREAS OF PLANT, BECAUSE HIS INSPECTIONS WERE TOO THOROUGH
408					ATT.10 17		ATKINSON - MANAGEMENT IGNORED QA INSPECTOR MEMORANDUM ON HOLD TAG FALSIFICATION
409					ATT.10 18		ATKINSON - MANAGEMENT DENIED INSPECTOR AUTHORITY TO ISSUE HOLD TAGS DIRECTLY
410					ATT.10 19		ATKINSON - REMOVAL OF QA HOLD TAGS COINCIDED WITH ATTEMPTS TO COVER UP THE FLAWS THAT HAD BEEN CITED

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	2/2/84 GAP	2/22/84 JI	3/2/84 GAP	3/2/84 JI	3/23/84 GAP	4/16/84 D.Kirsch	
414					ATT.10 1		HE QUESTIONED WHETHER PULLMAN COMPLIED WITH LATEST REVISION TO DESIGN SPECIFICATIONS AND WELDING PROCEDURES
415					ATT.10 2		ATKINSON-DIRECTED INSPECTOR TO ONLY LOOK AT THE INDIVIDUAL WELD ASSIGNED FOR INSPECTION-NOTHING ELSE
416					ATT.10 3		ATKINSON-INCONSISTENT WELD ACCEPTANCE STANDARDS USED BY DAY AND NIGHT SHIFT INSPECTORS
417					ATT.10 4		ATKINSON-INCONSISTENT WELD ACCEPTANCE BETWEEN DAY AND NIGHT SHIFT INSPECTORS, BASED ON INFORMAL TOLERANCES ESTABLISHED BY MANAGEMENT
418					ATT.10 5		ATKINSON-QUALITY OF EARLY INSPECTORS WAS ERRATIC AND INSPECTION RECORDS SUPERFICIAL
420					ATT.10 7		ATKINSON-MANAGEMENT INSTRUCTED WELD INSPECTORS TO EMPHASIZE CERTAIN SECTIONS OF ACCEPTANCE STANDARDS AND IGNORE OTHERS
421					ATT.10 8		ATKINSON-INCONSISTENT ACCEPTANCE AND REJECTION OF SIMILAR WELDS
422					ATT.10 9		ATKINSON-INSPECTOR FOUND A 60% FAILURE RATE DURING REINSPECTION OF PREVIOUSLY ACCEPTED WELDS
423					ATT.10 10		ATKINSON-QA MANAGER RESTRICTED ISSUE OF FORMAL NONCONFORMANCE FORMS ON UNACCEPTABLE WELDS
424					ATT.10 11		ATKINSON-QA MANAGER ACCEPTED WELDS WITHOUT A DETAILED/CLOSE UP INSPECTION
426					ATT.9 PAGE 3 PARA 1		PULLMAN WAS FORCED TO HIRE PEOPLE WHO HAD NO QC EXPERIENCE IN ORDER TO PROVIDE A REQUIRED MINIMUM NUMBER OF INSPECTORS

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	2/2/84 GAP	2/22/84 JI	3/2/84 GAP	3/2/84 JI	3/23/84 GAP	4/16/84		
427					ATT.9 PAGE 3 PARA 2		NO FORMAL TRAINING FOR NEW QC INSPECTORS IN 1982	
428					ATT.9 PAGE 3 PARA 3		QC INSPECTORS WORK BETWEEN JANUARY 1983 AND SEPTEMBER 1983 IS SUSPECT BECAUSE OF INADEQUATE TRAINING	
429					ATT.9 PAGE 4. PARA 3		QA WAS NOT DOING ITS JOB ADEQUATELY BECAUSE ALLEGER FOUND MORE REJECTED DRAWINGS THAN QA DID	
430					ATT.9 PAGE 5 PARA 1		TRAINING WAS NONEXISTANT FOR PULLMAN CRAFT PERSONNEL	
431					ATT.9 PAGE 5 PARA 3		PULLMAN STARTED WORK FIRST AND TRIED TO RECTIFY PROBLEMS AFTER THE FACT WITHOUT GOING BACK TO CORRECT ORIGINAL PROBLEM e.g. WELDING WAS PERFORMED WITHOUT REQUIRED WELDING PROCEDURE	
434					ATT.9 PAGE 8 PARA 3		MANAGEMENT IS NOT RESPONSIVE TO QC INSPECTORS CONCERNS	
435					ATT.8 PAGE 1 PARA 2		THE SAME QA BREAKDOWN THAT OCCURRED AT PULLMAN ALSO OCCURRED AT GUY F. ATKINSON COMPANY	
440					ATT.8 PAGE 3 PARA 3		ALLEGER NOTED A WELDER PERFORMING WORK WITHOUT PROPER PRE-HEAT	
441					ATT.8 PAGE 4 PARA 2		NO ONE INFORMED WELDER OF THE REQUIREMENTS HE WAS TO WORK TO	
443					ATT.1 7		GUARDS DO NOT PAY ATTENTION TO X-RAY SCREENS, AND ONLY GO THROUGH MOTIONS ON THE PATDOWNS	
444					ATT.1 8		SECURITY DEPARTMENT OVERWORKED	

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445					ATT.1 9		SECURITY BREAKING DOWN DUE TO POOR MORALE AMONG GUARDS
446					ATT.1 10		MANAGEMENT HAS NOT INFORMED SECURITY WHAT THEY CAN AND CANNOT DO TO PROTESTORS
447					ATT.1 11		SECURITY COMPUTER IS UNRELIABLE AND IN LAST SEVERAL MONTHS HAS ERRONEOUSLY PERMITTED A DOZEN HOLDERS OF EXPIRED KEY CARDS TO PASS THROUGH SECURITY
448					ATT.1 12		PINKERTON DOES NOT ALLOW GUARDS TO RAISE QUESTIONS ABOUT PLANT SECURITY
449					ATT.1 13		IT IS A PUNISHABLE OFFENSE TO RAISE QUESTIONS OUTSIDE OF THE CHAIN OF COMMAND e.g. GO TO PG&E SECURITY WITH A PROBLEM
450					ATT.6 067/068 PI4PAR3		PULLMAN FAILED TO RECOGNIZE CODE NON-COMPLIANCE
453					ATT.1 4		LACK OF PROPER ATMOSPHERE INSIDE THE CONTAINMENT
454					ATT.1 5		EXCESSIVE PIPING LEAKS E.A. AT THE 85 FOOT LEVEL IN THE TURBINE BUILDING SOUTHEAST SIDE NORTH OF DOOR 129 AND 2 LEAKS AT THE 115 FOOT LEVEL EAST PENETRATION AREA BY DOOR 365
455					ATT.1 6		SECURITY INADEQUATE AS EVIDENCED BY A CHANTING PROTESTOR ENTERING THE SECURITY AREAS
456					ATT.2 24		PG&E IS NOT APPROVING THE DESIGN OF ANY 2" AND UNDER HANGERS DESPITE FEBRUARY 17, 1984 LETTER TO NRC STATING THAT THEY HAVE PREPARED THE FINAL APPROVED DRAWINGS
457					ATT.6 082 3		PULLMAN'S TRAINING PROGRAM DID NOT ADDRESS THE TECHNICAL OBJECTIVES OF THE PROJECT

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458					ATT.6 082 4		PULLMAN'S TRAINING PROGRAM DID NOT EXPLAIN THE QUALITY ASSURANCE ELEMENTS TO BE EMPLOYED ON THE JOB
459					ATT.6 082 5		PULLMAN QC INSPECTORS WERE INSTRUCTED TO CONSULT ONLY PULLMAN PROCEDURES FOR COMPONENT EVALUATION AND TO ACCEPT ALL CONDITIONS OUTSIDE OF THE PROCEDURAL SCOPE
460					ATT.6 067/078 P4PARA3		PULLMAN DID NOT HAVE A WELDING PROCEDURE TO COVER WELDING MECHANICAL FASTENERS
462					ATT.2 12		TWO NDE TECHNICIANS WERE CERTIFIED LEVEL II DESPITE LETTERS IN THEIR FILES STATING THAT THEY WERE NOT QUALIFIED
463					ATT.2 13		QA MANAGER HAROLD KARNER CERTIFIED LEVEL II FOR MP, RT., LPT, AND LEVEL I UT WITHOUT MEETING REQUIREMENTS
464					ATT.2 14		314 WELDS INSPECTED WITH MAGNETIC PARTICLE TEST IN 4 DAYS BY ONE INSPECTOR
466					ATT.2 17		QA/QC PERSONNEL INTERMINGLED RESPONSIBILITIES WITH PRODUCTION PERSONNEL DURING 1971-1972
467					ATT.2 18		(ITEM 17) PRACTICE OF MIXING QA/QC AND PRODUCTION RESPONSIBILITIES CONTINUED IN 1976
468					ATT.2 19		MR. MULLIS USED ONE PROCESS SHEET FOR FIVE WELD JOINTS
470					ATT.2 3		THERE WAS NO FORMAL QA PROGRAM FOR PIPE SUPPORTS AND PIPE RUPTURE RESTRAINTS
471					ATT.2 4		ALTHOUGH PULLMAN IDENTIFIED MANY DEFICIENCIES OF ESD 223 IN 1973, THE COMPANY DID NOT LEARN ITS LESSON. THE NSC AUDIT REPEATED SIMILAR FINDINGS IN 1977

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	GAP	JI	GAP	JI	GAP	D.Kirsch	
472					ATT.2		PRE-DECEMBER 1973 PIPE SUPPORTS WERE INSTALLED "PRIOR TO IMPLEMENTING THE INSPECTION PROGRAM"
473					ATT.2 6		IN THE PAST, PULLMAN DID NOT CONDUCT AUDITS OR PRACTICES TO ASME OR 10 CFR 50
474					ATT.2 7		UNTIL NOVEMBER 1978, SOME PARTS OF THE QA PROGRAM HAD NEVER BEEN AUDITED
475					ATT.2 11		MAGNETIC PARTICLE EXAMS FOR AN NDE SUPERVISOR DO NOT SHOW HIS GRADE
351							SLOTTED HOLES ON RUPTURE RESTRAINTS NOT IN ACCORDANCE WITH ASTM A-325
476					ATT.2 PAGE 1		INADEQUATE DOCUMENTATION ON A-325 AND A-307 USAGE-STOKES REBUTTAL TO PG&E'S RESPONSE DCL-84-067, DCL-84-078
477					ATT.2 PAGE 2		INADEQUATE MATERIAL TRACEABILITY BACK TO CERTIFICATE OF COMPLIANCE FOR THE ABOVE BOLTS-STOKES REBUTTAL TO PG&E'S RESPONSE DCL-84-067
478					ATT.2 PAGE 4		INADEQUATE TRAINING FOR QA INSPECTORS-STOKE'S REBUTTAL TO PG&E'S RESPONSE DCL-84-067
479					ATT.2 PAGE 5		MODIFICATIONS PERFORMED DURING THE HOT FUNCTIONAL TEST WAS NOT REPORTED TO NRC-STOKE'S REBUTTAL TO PG&E'S RESPONSE DCL-84-094
480					ATT.2 PAGE 5		CLAMPING PLATE INSTALLATIONS MAY NOT BE ALL CORRECT-STOKE'S REBUTTAL TO PG&E'S RESPONSE
481					ATT.2 PAGE 6		NO ENGINEERING DOCUMENTS AVAILABLE TO SUPPORT TO PRACTICE OF WELDING UNISTRUTS-STOKE'S REBUTTAL TO PG&E'S RESPONSE

