



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION V

1450 MARIA LANE, SUITE 210
WALNUT CREEK, CALIFORNIA 94596

August 28, 1984

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

Dear Sir:

The allegations included in Attachment 1 are being directed to PG&E for evaluation, investigation, and response. Attachment 1 includes the listing of the Region V allegation numbers, a characterization of the allegations, and the applicable source documents. For allegations with a source document reference beginning with "T", refer to Attachment 2 for additional information. These allegations were contained in confidential documents that cannot be supplied to PG&E. Attachment 2 is a paraphrasing of the allegations, approval for their release has been obtained from the NRC Office of Investigation.

For each specific allegation or concern forwarded by this letter, the NRC must be apprised, 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 concern number. Your responses will be evaluated by the staff for clarity, comprehensiveness, and substance. The responses are subject to verification by the staff. 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.

For any questions, please call the Region V office.

Sincerely,

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

- Attachments:
1. Listing of Allegations
 2. Paraphrasing of Allegations
Contained in Confidential Transcripts

For Release to
PDR

H005
1/1

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PDR ADOCK 05000275
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COPY

Document Name:
CROWLEY-ALLEGATIONS

Requestor's ID:
OPER1

Author's Name:
CROWLEY

Document Comments:
PLS DO NOT REMOVE THIS SHEET-RITA 8/23

Allegations - transmitted
to P.G. & E for
Response

DESIGNATED ORIGINAL
Certified By Dot Neack

To T. Bishop,

For signature or
comment,

Thanking
You Crowley

TC - we need OI's review for
① confidentiality
② compromise of their investigations.
- pls obtain OI's concurrence.

TB

8/28/84

Reviewed by OI and found no problem with confidentiality
or compromise of investigators. OCS

FOR RELEASE TO
PDR

H005
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84-4057

Attachment 1 to Letter
LISTING OF ALLEGATIONS

DIABLO CANYON ALLEGATIONS BY RESPONSIBILITY

ALLEG #	CHARACTERIZATION	SOURCE	RESP
0317	MANAGEMENT DID NOT HAVE NECESSARY DOCUMENTS FROM VENDORS TO GUIDE CALCULATIONS REQUIRED OF VENDOR PURCHASES FOR STRUCTURAL STEEL SUPPORTS	3/2/84GAP#280	RV-P
0392	ATKINSON-NIGHT SHIFT DA INSPECTION WAS ABOLISHED BECAUSE OF HIGH QUALITY STANDARDS APPLIED	3/23/84GAP	RV-P
0393	ATKINSON-MANAGEMENT WARN DA NIGHT SHIFT TO EASE UPON APPLICATION OF INSPECTION STANDARDS	3/23/84GAP	RV-P
0394	ATKINSON-MANAGEMENT CANCELLED THE NIGHT SHIFT DA INSPECTION TO ELIMINATE A PRODUCTION OBSTACLE	3/23/84GAP	RV-P
0395	ATKINSON-MANAGEMENT TRANSFERRED INSPECTOR IN RETALIATION FOR APPLICATION OF HIGH QUALITY STANDARDS	3/23/84GAP	RV-P
0405	ATKINSON-MANAGEMENT INSTRUCTED PRODUCTION CREWS TO IGNORE AND/OR REMOVE DA HOLD TAGS ON WELDS	3/23/84GAP	RV-P
0406	ATKINSON-PRODUCTION CREWS REMOVED DA HOLD TAG ON WELD AND GROUND IT DOWN SO LOCATION OF WELD WOULD NOT BE EASY TO BE IDENTIFIED	3/23/84GAP	RV-P
0465	SIGNATURES ON PIPE RUPTURE RESTRAINT WELD PROCESS SHEETS ARE PHONEY, A BLANK WAS SIGNED THEN XEROXED	3/23/84GAP	RV-P
0513	FAILURE TO COMPLY WITH WELD PROCEDURE REQUIREMENTS LED TO "SERIOUSLY PATHETIC" WELDS FOR THE PIPE RUPTURE RESTRAINTS	2/2/84GAP#29	RV-P
0570	IN JANUARY 1983 ALLEGER WAS REMOVED AS INTERNAL AUDITOR FOR NOT CLOSING ENOUGH AUDITS ALTHOUGH OTHERS WERE THE CAUSE OF DELAY	2/2/84GAP#92	RV-P
0571	WHEN INFORMED OF NON-COMPLIANCE WITH 10CFR50 APP. B, D.A. MANAGER STATED THAT PULLMAN WAS NOT COMMITTED TO APPENDIX B	2/2/84GAP#93	RV-P
0635	PULLMAN DC MANAGER NEVER RESPONDED TO AN INSPECTOR'S MEMO ABOUT A POTENTIALLY WIDESPREAD PROBLEM WITH BASEPLATES MOUNTED OVER CONCRETE WITH VOIDS	3/2/84GAP#199	RV-P
0665	DAPE'S REFORM COMMITMENTS HAVE NOT BEEN APPLIED TO THE FIELD THROUGH AN ON-SITE TRAINING PROGRAM FOR THE ENGINEERS	3/2/84GAP#246	RV-P
0715	PRE-1981 "AS-BUILT" REVIEW WERE PERFORMED WITHOUT SPECIFICATIONS (SEE/WE PREVIOUS PGM RESPONSE)	3/23/84GAP	RV-P
0753	AWS INSPECTOR STAMPS ISSUED TO NON-LEVEL II INSPECTORS, I.E. TO LEVEL I INSPECTORS	T1 4/9/84 P106,111	RV-P
0758	HANGER #24-208--WELDS ON LUG ATTACHMENTS ARE NOT AS SPECIFIED	T4 4/11/84 P43	RV-P
0759	ATKINSON DC WAS NON-EXISTENT AT START, IT WAS SOMETHING THAT JUST SORT OF DEVELOPED	T6 4/11/84 P5-15	RV-P

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DIABLO CANYON ALLEGATIONS BY RESPONSIBILITY

ALLEG #	CHARACTERIZATION	SOURCE	RESP
0772	HOLD TAGS REMOVED WITHOUT PROPER AUTHORIZATION	T5 4/11/84 P20-14	RV-P
0774	ALLEGED FOUND SO MANY PROBLEMS IN VAULT AUDIT THAT HE WAS GIVEN ANOTHER ASSIGNMENT	T6 4/11/84 P32-22	RV-P
0775	VAULT AUDIT FINDINGS (UNOFFICIAL) - INCOMPLETE FUEL INSPECTION FORMS, CHECK MARKS MISSING, INITIALS MISSING, WELDER'S NAMES MISSING	T6 4/11/84 P33-5	RV-P
0776	VISUAL INSPECTION OF THE FIRST WELD PASS WAS MISSED 10% OF THE TIME	T6 4/11/84 P33-21	RV-P
0777	ONLY THE WELDER WHO COMPLETED THE WELD WOULD APPEAR ON RECORD	T6 4/11/84 P34-4	RV-P
0778	INSPECTIONS WERE DOCUMENTED "AFTER THE FACT"	T6 4/11/84 P36-18	RV-P
0781	QC PROBLEMS WERE HANDLED INFORMALLY, BY MEMO FROM NIGHT SHIFT TO DAY SHIFT	T6 4/11/84 P44-9	RV-P
0783	AN INDIVIDUAL WAS SITTING THERE WRITING "OK" ON DOCUMENTATION	T6 4/11/84 P47-1	RV-P
0784	DOCUMENTATION WAS REWRITTEN AND SIGNATURES TRANSFERRED WITHOUT PROCEDURES AND ADEQUATE DOCUMENTATION TO "CLEAN UP" PAPER	T6 4/11/84 P49-1	RV-P
0787	INSPECTIONS WERE BACKFIT, SUCH AS VISUAL INSPECTION AFTER THE FACT -- TOO LATE, CAN'T VERIFY	T6 4/11/84 P54-13	RV-P
0792	POOR DRAWING CONTROL IN PULLMAN AND ATKINSON	T7 4/12/84 P69-20	RV-P
0795	WORK NOT PERFORMED IN ACCORDANCE WITH ESD'S	T7 4/12/84 P77-21	RV-P
0800	IT WAS IMPOSSIBLE FOR QC TO GET A WELDER RECALLED FOR RETEST	T7 4/12/84 P82-14	RV-P
0801	QC COULD NOT REJECT WORK	T7 4/12/84 P83-16	RV-P
0802	QA/QC NOT INDEPENDENT FROM PRODUCTION	T7 4/12/84 P84-23	RV-P
0803	QC INSPECTOR NEVER FOUND OUT DISPOSITION OF NCR	T7 4/12/84 P89-5	RV-P
0805	THERE WAS NO IN-HOUSE SYSTEM TO REPORT PROBLEMS OBSERVED OUTSIDE OF QC INSPECTOR'S RESPONSIBILITY	T7 4/12/84 P94-1	RV-P
0811	WELDERS WHO DID WORK WERE NOT ACCURATELY DOCUMENTED	T7 4/12/84 P112-6	RV-P
0812	DEFECT IN BUSSET PLATE (IN TURBINE BUILDING ON THE CENTERLINE OF THE POPE IN THE LOWER CORD)	T7 4/12/84 P118-1	RV-P
0813	PLANT IS BUILT ON UNDERGROUND STEAM BED WHERE GRANITE WAS PREDICTED (TURBINE BUILDING, WEST SIDE)	T7 4/12/84 P121-1	RV-P
0814	PULLMAN-STAINLESS ELECTRODES CAME OUT TO FIELD COLD IN A ROB OVEN, BUT IT WAS NOT PLUGGED IN	T14 1/7/84 P192-2	RV-P

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DIABLO CANYON ALLEGATIONS BY RESPONSIBILITY

ALLFB #	CHARACTERIZATION	SOURCE	RESP
0817	PULLMAN POWER PRODUCTS WELDING ENGINEER PROVIDED FALSE STATEMENT THAT CODE DOES NOT HAVE REJECTION CRITERIA FOR POROSITY WHEN WELDING WITH COATED SS ELECTRODES FOR SHIELDED METAL ARC	T14 4/9/84 P196-17	RV-P
0818	MISHANDLING OF COATED STAINLESS STEEL ELECTRODES COULD POSSIBLY CONTRIBUTE TO INTERGRANULAR STRESS CORROSION CRACKING-FULLMAN	T14 4/9/84 P196-18	RV-P
0822	FOLEY WELD ROD CONTROL DOES NOT GIVE VERIFICATION TO WELDER THAT RIGHT AMOUNT OF ROD TURNED IN		RV-P
0823	DC INSPECTORS PERFORMING INSPECTIONS WITHOUT BEING QUALIFIED LEVEL 1	T2 P129-18	RV-P
0838	3 CAISSON HOLES 65 TO 85 FT. DEEP DRILLED IN MID-1979 DRILLED INTO SANDSTONE VICE GRANITE THAT WAS SUPPOSED TO BE THERE	T8 5/2/84 P3-13-22	RV-P
0839	ANCHORING BEDROCK FOR TURBINE IS SO FRACTURED THAT THERE WERE VEINS OF DIESEL OIL FROM LEAKING TANKS IN THE ROCK	T8 5/2/84 P3-23-25	RV-P
0840	THE BEDROCK THAT THE PLANT IS ANCHORED TO IS NOT SOLID. THERE WERE MANY INSTANCES OF ANCHORING CABLES PULLING OUT OF THE ROCK AND LOSING THEIR TENSION	T8 5/2/84 P4-6-11	RV-P
0841	GEOLOGISTS DID NOT DO AN ADEQUATE JOB OF IDENTIFYING THE ROCK THAT THE PLANT IS BUILT ON AND THE FRACTURED NATURE OF IT	T8 5/2/84 P4-14-17	RV-P
0842	THE CORE DRILLERS DRILLED THROUGH A 16000 VOLT BUS BAR	T8 5/2/84 P5-6-8	RV-P
0843	PG&E BLUEPRINTS NOT VERIFIABLE WITH REVISIONS SO UNCHECKED AND UNCONTROLLED THAT THEY DON'T KNOW WHAT THEY HAVE OUT THERE	T8 5/2/84 P5-14-20	RV-P
0844	PG&E DID NOT REPAIR BUS BAR AFTER IT WAS DRILLED INTO	T8 5/2/84 P8-21-24	RV-P
0849	THERE WAS NO METHOD TO ENSURE THAT BOLTS WEREN'T BEING REUSED	T8 5/2/84 P15-22-24	RV-P
0855	WELDERS TAKING THEIR TEST SOMETIMES TOOK A WEEK. THE TEST SHOULD TAKE ONLY 4 HOURS	T8 5/2/84P21-23-5-12	RV-P
0856	ONLY 1% OF THE WELDERS TAKING THE TEST FAILED IT. 15-20% WOULD HAVE BEEN MORE REALISTIC	T8 5/2/84P23-24-21-1	RV-P
0857	WHEN 35% OF THE STIFFENER PLATE WELDS FAILED THEY WERE REPAIRED USING THE SAME PROCEDURES THAT THEY WERE INITIALLY INSTALLED BY	T8 5/2/84P25-26-22-2	RV-P
0860	IN PFP SELF-STUDY BOOK #2 TO CFR 59 APPENDIX B CRITERIA WAS INCORRECTLY GRAPHICED	5/3/84 GAP ITEM1 P7	RV-P
0867	UNAUTHORIZED MODS TO FILLET WELDS ENROUCHED ON BOLT OR WASHER LAND AREAS	5/3/84 GAP ITEM1 P10	RV-P
0869	FIELD INSPECTORS DIDN'T KNOW NOR WERE THEY LEGALLY ABLE TO REJECT BOLTS THAT WERE DEFECTIVE PER ASTM A 429 ASTM A25 AND ASME BOLT REQUIREMENTS	5/3/84 GAP ITEM2 P10	RV-P

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DIABLO CANYON ALLEGATIONS BY RESPONSIBILITY

ALLEG #	CHARACTERIZATION	SOURCE	RESP
0875	DEFECTS IN A-420 BOLTS HAD BEEN FOUND AFTER THE BOLTS HAD BEEN "DEDICATED" BY PFP/DA RECEIVING DEPARTMENT AND SENT TO FIELD FOR INSTALLATION	5/3/84 GAF ITEM P10	RV-P
0881	BOLTING PROGRAM FOR RUPTURE RESTRAINTS AS PRACTICED BY PFP NOT IN ACCORDANCE WITH CONTRACT SPEC PART 3R FOR STRUCTURAL STEEL ERECTION (IE NOT FOLLOWING AISC MANUAL, 7TH EDITION)	5/3/84 GAF EXHI 4 P1	RV-P
0882	RUPTURE RESTRAINT BOLTING DEFECTS WERE NOT REPORTED PER 10 CFR 21.21	5/3/84 GAF EXHI 4 P4	RV-P
0883	DA PROGRAM BREAKDOWN IN THE DESIGN CHANGE AREA IN THAT DESIGN DRAWINGS DID NOT REFLECT UNAUTH MODS TO FILLET WELDS BECAUSE ENGINEERING ISSUED NO AG-BUILTS AFTER MOD WAS COMPLETED	5/3/84 GAF EXHI 4 P6	RV-P
0884	FIELD ENGINEER ISSUED PROPER WASHER CRITERIA W/O NOTIFYING PFP OR PG&E DA. WHEN DA/DC MANAGER WAS INFORMED THAT ESD 243 HAD IMPROPER CRITERIA, NO NCR OR ESD UPDATE WAS MADE	5/3/84 GAF EXHI 4 P7	RV-P
0886	PFP DID NOT TRAIN INSPECTORS ON AISC BOLTING CRITERIA	5/3/84 GAF EXHI 4 P7	RV-P
0904	SF DESIGN TEAM ATTEMPTED TO CUT OFF TIME FOR ISSUING DRAWING TO THE FIELD THEREBY VIOLATING DOCUMENT CONTROL PROCEDURES WITHOUT REPORTING THE PROBLEM. COULD CAUSE WORK TO OCCUR W/O APPROVED DRAWINGS	T19V1 4/30 P24-8T013	RV-P
0906	ALLEGER WAS TOLD NOT TO DO RESEARCH AS TO THE CONFLICT BETWEEN TWO RED LINE MEMOS. ALSO TOLD TO DROP THE SUBJECT OF DRILLING ANCHOR BOLT HOLES ALLEDEDLY AGAINST A PROCEDURE	T19V1 4/30/84 P14-22	RV-P
0907	STARTED RECEIVING A BACKLOG SO THE ALLEGER STARTED ELIMINATING THE CHECKING PORTION OF A HANGER PACKAGE	T19V1 4/30/84 P10-6	RV-P
0908	A PROCEDURE SAID TO VERIFY ALL GROOVE WELDS BUT PFP WASN'T VERIFYING ALL THE GROOVE WELDS. ANOTHER ONE SAID TO EXPLAIN CROSS-OUTS ON THE BACK OF PROCESS SHEETS. THE ALLEGER WAS TOLD TO IGNORE INST.	T19V1 4/30/84 P8-23	RV-P
0909	TOLD NOT TO REJECT HANGERS FOR WELDS THAT WERE SUPPOSEDLY MADE TO CODE 7/8 BUT WERE NOT COVERED BY CODE 7/8	T19V1 4/30/84 P8-15	RV-P
0911	DESIGN ENGINEERS IN THE PRE-INSPECT PROGRAM WITH NO FIELD EXPERIENCE DIDN'T KNOW HOW TO USE FILLET GAUGES TO MEASURE WELD SIZES.	T19V1 4/30/84 P7-18	RV-P
0915	VIOLATION OF DC INSPECTION HOLD POINTS	T3 4/30/84 P14&15	RV-P
0916	FOLEY DA/DC DEPARTMENT WAS SUBJECTED TO PRODUCTION PRESSURE	T3 4/30/84 P19-126	RV-P
0917	DUALITY ENGINEERING DEPARTMENT SET UP THEIR OWN SEPARATE ENTITY FOR HANGING RED TAGS	T3 4/30/84 P20&51	RV-P
0918	CUTS WERE MADE IN BETWEEN SCOT WELDS HOLDING BRISCHITS TOGETHER. NO NOTES GENERATED	T3 4/30/84 P23&34	RV-P

DIABLO CANYON ALLEGATIONS BY RESPONSIBILITY

ALLEG #	CHARACTERIZATION	SOURCE	RESP
0919	MISSING HEAT LOG NUMBERS AND LACK OF MATERIAL TRACEABILITY VIA HEAT NUMBERS E.G. HT NO INDICATES ONE INCH METAL WHEREAS METAL ACTUALLY THREE-QUARTERS	T3 4/30/84 P39-41,50	RV-P
0925	FOREIGN STEEL USED TO FAB CRANE RAILS IN THE TURBINE BLDG	T3 4/30/84 P111	RV-P
0927	PROCEDURES DID NOT HAVE UP-TO-DATE PCN'S PROCEDURE CHANGE NOTICES	T3 4/30/84 P123	RV-P
0928	PULLMAN INSPECTOR HAD SPECIFIC INSTRUCTIONS NOT TO ADDRESS OLD RUPTURE-RESTRAINT WORK THAT HAD BEEN PERFORMED BY A VENDER-ONLY INSPECT PULLMAN WORK/WELDS	T13 4/6/84 P171-8	RV-P
0931	INTIMIDATION - PULLMAN DC SUPERVISOR SAID INSPECTOR REQUEST TO PERFORM A CHECK OF GAS FLOW RATE CLOSER TO WORK WAS IN HIS OPINION EXCESSIVE AND HE WAS NOT GOING TO FORCE IT ON CRAFT	T13 4/6/84 P174-20	RV-P
0932	PULLMAN WELDING MACHINES DID NOT MEET PGM CONTRACT SPEC. B711, SECTION 1, PARA 7.10.1: NO HI FREQUENCY FOR ARC-STARTING OR RHEOSTAT FOR CURRENT-CONTROL CAPABILITIES (GAS TUNGSTEN ARC WELD MACHINE)	T13 4/6/84 P133-6	RV-P
0933	PULLMAN INSPECTORS WERE SPECIFICALLY INSTRUCTED TO ONLY CONSULT PULLMAN PROCEDURES FOR EVALUATIONS-PREVENT FROM PERFORMING AS AN ANSI N45.2.6 INSPECTOR	T13 4/6/84 P129-25	RV-P
0934	PULLMAN PROCEDURE ESD 243 HAS NO REJECTION CRITERIA FOR BOLTS DEFECTS IN 490 BOLTS - LONGITUDINAL QUENCH CRACKS	T13 4/6/84 P129-13	RV-P
0937	PULLMAN VIOLATED MINIMUM WALL DURING REPAIR WELDING - FIELD WELD 197	T13 4/6/84 P81-13	RV-P
0938	PROBLEMS WITH FIELD WELD 197 SHOULD HAVE BEEN REPORTED BY LICENSEE TO NRC	T13 4/6/84 P70-21	RV-P
0939	PULLMAN EMPLOYEE HAD A HABIT OF NOT INCLUDING ALL THE DISCREPANCIES ON HIS RADIOGRAPHIC CHECK SHEET IN HIS PULLMAN REPORTS	T13 4/6/84 P65-16	RV-P
0942	ATKINSON HIRED UNQUALIFIED WELDING INSPECTORS	T17 4/7/84 P135/9-14	RV-P
0944	ATKINSON WELD TEST BOOTH SUPERVISORS WERE NOT REQUIRED TO BE IN CONTINUOUS ATTENDANCE DURING WELDER TESTING	T17 P134-22	RV-P
0945	BOLTS ATTACHING PIPE HANGER AND SUPPORTS IN THE DIESEL GENERATOR BUILDING MAY NOT HAVE PROPER TORQUES	T17 4/7/84 P145/7-9	RV-P
0946	QA INSPECTORS TOLD NOT TO LOOK AT "OLD WORK"	T17 4/7/84 P148-2-4	RV-P
0949	A DC INSPECTOR OVERLOOKED SLAG DEPOSITS ON 3 OR 12 WELDS	T17 4/7/84 P179-11	RV-P
0950	RUPTURE RESTRAINTS OUTSIDE THE CONTAINMENT VESSEL UNIT 2 LOCATION 24-46-19 OVER 11-RT NEAR BENT 1, HAD INADEQUATE NDE PREPARATION AND WERE INSPECTED	T17 4/7/84 P180-15	RV-P
0952	A DC INSPECTOR ROUTINELY CONDUCTED NDE WITHOUT ADEQUATE WELD PREP	T17 4/7/84 P185-7,25	RV-P

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DIABLO CANYON ALLEGATIONS BY RESPONSIBILITY

ALLEN #	CHARACTERIZATION	SOURCE	RESP
0953	PG&E ACCEPTED WELDS IMPROPERLY INSPECTED USING AC DC MAGNETIC PARTICLE TEST EVEN 3 THAT FAILED INSPECTION	T17 4/7/84 P196-7	RV-P
0954	PG&E RESPONSES ABOUT DC INSPECTOR QUALIFICATIONS CONTAINED DISPARITY	T17 4/7/84 P207-7	RV-P
0955	TWO ADDITIONAL DC INSPECTORS WERE NOT QUALIFIED	T17 4/7/84 P208-6-20	RV-P
0969	PG&E DOESN'T WANT FULLMAN TO REPORT DEFECTIVE SHOP WELDS	T16 4/6/84 P11THRU18	RV-P
0971	CARRON STEEL MATERIALS FOUND IN STAINLESS STEEL HOLD AREAS	T5 5/3/84 P77-20	RV-P
0977	PG&E HAS POOR DA IN THE RUPTURE RESTRAINT REPAIR PROGRAM	T5 5/3/84 P31-22	RV-P
0981	IMPROPER FIT-UP OF LARGE BASE PLATE BEAM (ON HANGER) CAUSING AN IMPROPER WELD WHICH WAS BOUGHT OFF	T5 5/3/84 P8-14	RV-P
0982	A490 BOLTS DEFECTIVE WITH LONGITUDINAL QUENCH CRACKS AND FORGING LAPS ON THE HEAD	T15 5/1/84 P26-14	RV-P
0986	UNAUTHORIZED MODS TO FILL ET WELDS THAT ENCLOSED ON BOLT OR WASHER LAND AREAS	T15 5/1/84 P14-9	RV-P
0987	PG&E HAS NOT FOLLOWED THROUGH ON NCR REQUIRING FULLMAN TO PERFORM A COMPLETE REVERIFICATION OF WELDED AND BOLTED CONNECTIONS	T15 5/1/84 P7-3	RV-P
0989	PRODUCTION PERSONNEL DEFINING THE QUALITY OF WORK IN FIELD (WHICH IS NOT ALLOWED)	T15 5/1/84 P6-2	RV-P
0994	ATKINSON 78 INSPECTOR HOLD TAG CLEARED FROM WORK (TURBINE BLDG.-119 LEVEL) UNDER QUESTIONABLE CONDITIONS FOR WORK ON RAFTS TO SUPPORT THE DECKING-WELDS NOT TO CODE	T6 4/11/84 P58-4	RV-P
0995	ATKINSON 78 INSPECTION WORK IN NORTHWEST CORNER ROOF AREA OF TURBINE BUILDING WAS PERFORMED BY QUESTIONABLE INSPECTOR	T6 4/11/84 P56-12	RV-P
0998	ATKINSON 78 AUDIT OF VAULT FOUND UNACCEPTABLE PAPER WORK INCOMPLETE FUEL INSPECTION FORMS, CHECKMARKS MISSING, ETC - ESPECIALLY PREVALENT WAS THE MISSING 10 PERCENT SIGN OFF FOR WELDS	T6 4/11/84 P35-5	RV-P
1007	ATKINSON 78 QUALITY CONTROL WAS SOMETHING THAT SORT OF DEVELOPED. IT WAS NOT THERE FROM THE START, SOME DOCUMENTS HAD TO BE BOUND BACK AND REWRITTEN TO OBTAIN ADEQUATE INSPECTION DOCUMENTS-SEE CHECK	T6 4/11/84 P5-15	RV-P
1008	CONTROL DOCUMENTS WERE NOT AUDITED--DOCUMENTS WERE OUT OF DATE	T11 4/16/84 P15-8	RV-P

DIABLO CANYON ALLEGATIONS BY RESPONSIBILITY

ALLEG #	CHARACTERIZATION	SOURCE	RESP
1009	PEOPLE WHO WANTED TO DO THE JOB RIGHT WERE SEGREGATED FROM THOSE WHO DIDN'T CARE, AND THE TWO GROUPS WERE THEN GIVEN DIFFERENT TASKS	T21 4/26/84 P19-9	RV-P
1026	FULLMAN INSPECTORS BUYING OFF OVER-OR UNDER-SIZED WELDS	T16 4/6/84 P67-5	RV-P
1035	GROUP LEADERS CHECKED A BOX ON A COVER SHEET THAT WAS ALREADY SIGNED MAKING IT APPEAR THAT THE PERSON PREPARING THE WORK XED THE BOX	T23 4/30/84 P9-2-13	RV-P
1036	BOXES WERE CHECKED ON THE COVERS OF THE PIPE HANGER DESIGNS THAT THEY DID NOT AFFECT THE SSAR WHEN IN FACT THEY DID AFFECT THE SSAR	T23 4/20/84 P14-B-14	RV-P
1055	ANCHOR BOLT DRILLED HOLES WERE NOT CHECKED IN ACCORDANCE WITH ESD 223	T23 4/30/84 P65-5	RV-P
1061	FOLEY 81/82 INSPECTOR TOLD NOT TO RED TAG A LOOSE BEAM CLAMP AFTER IT HAD BEEN ACCEPTED BY FOLEY DA AND PG&E BECAUSE HE COULD BE OUT OF A JOB IF HE DID	T9 4/10/84 P62-21	RV-P
1090	CONDUCTED INSPECTIONS WITHOUT LEVEL I OR LEVEL II CERTIFICATION	T2 4/11/84 P129	RV-P
1117	PG&E HAS ATTITUDE THAT IF IT CAN BE INSTALLED, DO IT EVEN IF IT MIGHT BE WRONG FOR EXAMPLE, HALF INCH FILLET WELD ON SCHEDULE 10 PIPE ON 3 SIDES ON A LUG ATTACHMENT	T18 4/10/84 P121	RV-P
1199	PG&E MADE A FALSE STATEMENT WHEN THEY STATED THAT 304H HAS NOT BEEN USED AT DIABLO, A LETTER DATED 2/10/84 INFERS THAT 304H WAS USED FOR PIPING	6/21/84GAP #51	RV-P
1200	PG&E MADE A FALSE STATEMENT WHEN THEY STATED THAT ASME IS THE REQUIREMENT FOR WELDED STUDS ON THE CONTAINMENT LINER, ESD272 REFERENCES AWS	6/21/84GAP #52	RV-P
1201	WELDING OF A307 STUDS TO THE CONTAINMENT LINER REQUIRES REQUALIFICATION OF THE WELDER BECAUSE A307 BOLTING MATERIAL IS NOT A "P1" MATERIAL	6/21/84GAP #53	RV-P
1202	PG&E MADE A FALSE STATEMENT WHEN THEY STATED THAT DA PROGRAM REMAINS IN EFFECT "FOR ALL WELDS", WHEN A 12/28/83 PROCEDURE CHANGE TELLS INSPECTORS NOT TO WRITE-UP REPORTS ON EXISTING WELDS	6/21/84GAP #54	RV-P
1205	FULLMAN DA MANAGEMENT PARTIALLY VOIDED DISCREPANCY REPORTS BY REWRITING IT. THE REPORT SHOULD BE ANSWERED ON THE RECORD, NOT CENSORED	6/21/84GAP #57	RV-P
1206	A FULLMAN MEMO DATED 5/31/84 CONFIRMS THAT WELDING OF A307 BOLTS IS UNACCEPTABLE, THEREFORE, ALL WELDED STUDS INSTALLED IN THE LAST 14 YEARS MUST BE REPLACED	6/21/84GAP #58	RV-P
1207	FULLMAN MANAGEMENT TRIED TO PREVENT DISTRIBUTION OF THE 5/31/84 MEMO	6/21/84GAP #59	RV-P
1208	THE 5/31/84 MEMO DISCREDITS THE NRC STAFF CONCLUSION THAT A307 BOLTS AT DIABLO CANYON IS ACCEPTABLE	6/21/84GAP #60	RV-P
1211	CHALLENGE OF NRC POSITION ON CRACKS IN COW LINES AT 51 DEGREES F GET CONDENSATION AND DRIPPING WHICH WILL AFFECT THE WELD QUALITY A FULLMAN MEMO 2/10/84 CONFIRMS FULLMAN'S KNOWLEDGE OF WELD PROBLEMS	6/21/84GAP #67	RV-P

DIABLO CANYON ALLEGATIONS BY RESPONSIBILITY

ALLEG #	CHARACTERIZATION	SOURCE	RESP
1212	IT IS A QUALITY ASSURANCE VIOLATION TO BASE DECISIONS ON VALUE JUDGEMENTS FOR SAFETY-RELATED WORK THAT MEANS THE WORK WAS NOT CONTROLLED BY PROCEDURE IN VIOLATION OF 10 CFR 50 APPENDIX B REQUIREMENTS	6/21/84GAP #64	RV-P
1213	CONTRARY TO THE NRC'S POSITION THAT WATER WAS NOT FLOWING DURING CCW WELDING A 2/10/84 PULLMAN MEMO REFUTE'S THIS STATEMENT, AND THE ALLEGEE HAS BEEN WELDING WITH WATER FLOWING IN THE LINES	6/21/84GAP #65	RV-P
1215	RECENTLY AN INSPECTOR FOUND THROUGH MT THAT THREE OUT OF FOUR WELDS HAD CRACKS ON CCW PIPE ATTACHMENTS, THIS RESULTED IN UNDOCUMENTED REPAIR	6/21/84GAP #67	RV-P
1216	SUPPORT PACKAGE 921-49 CONTAINS ILLEGAL QUICK FIXES, COPIED SIGNATURES, AND DIFFERENT REVISION OF THE SUPPORT	6/21/84GAP #68	RV-P
1220	PULLMAN HAS VERBALLY INSTRUCTED INSPECTORS NOT TO WRITE DISCREPANCY REPORTS. THESE INSTRUCTIONS ARE CONFIRMED BY MEMO	6/21/84GAP #72	RV-P
1221	PULLMAN REPEATEDLY HAS REQUESTED INSPECTORS TO WRITE-UP SUSPECTED DEFICIENT CONDITIONS NOT EXPLICITLY DEFINED BY PROCEDURE, ON MEMORANDUM	6/21/84GAP #73	RV-P
1223	WHEN SPECIFICATION VIOLATIONS ARE IDENTIFIED PULLMAN'S SOLUTION IS TO CHANGE THE SPECIFICATION RATHER THAN CORRECT THE VIOLATION	6/21/84GAP #75	RV-P
1225	DC INSPECTOR WAS REQUESTED TO RE-CONSTRUCT RECORDS FOR STANCHIONS ON SAFETY-RELATED LINES	6/21/84GAP #77	RV-P
1241	PG&E'S ANSWER CONCERNING THE PREINSPECT PROCEDURES IS MISLEADING BECAUSE THE PROGRAM WAS CONTROLLED THROUGH NUMEROUS UNCONTROLLED MEMO'S, MANY OF WHICH CONTRADICTED EACH OTHER	6/21/84GAP #97	RV-P
1242	PG&E STATED THAT DC WAS ASSIGNED TO INSPECT EXISTING WELDS, THIS STATEMENT IS FALSE BY OMISSION. THE PPE-INSPECTION GROUP HAD RESPONSIBILITY FOR THIS ACTION	6/21/84GAP #98	RV-P
1243	PG&E MADE A FALSE STATEMENT WHEN THEY STATED THAT IT WASN'T THE FIELD ENGINEER'S RESPONSIBILITY TO TRACK PREVIOUS DOCUMENTATION FOR EXISTING WORK, IT WAS	6/21/84GAP #99	RV-P
1245	PG&E'S RESPONSE TO GAP ALLEGATION #075 ON THE LACK OF A UNIFORM SYSTEM OF WELD SYMBOLS IS A FALSE STATEMENT BY OMISSION. THE ALLEGEE WAS INSTRUCTED NOT TO USE AWS A2.4	6/21/84GAP #101	RV-P
1246	PG&E STATES THAT 350 PERSONS WERE TRAINED ON WELD SYMBOLS. THIS STATEMENT IS FALSE BY OMISSION. IT FAILS TO POINT OUT THAT WE WERE BEING TRAINED TO MEET CRITERIA NOT TO AWS	6/21/84GAP #102	RV-P
1247	PG&E MADE A FALSE STATEMENT CONCERNING WELD SYMBOLS. THE ALLEGEE STATES THAT HE CAN IDENTIFY CASES THAT ARE SO INADEQUATE THAT THE SAME SYMBOL CONTRADICTS BETWEEN PIPING AND CIVIL WELDS	6/21/84GAP #103	RV-P

DIABLO CANYON ALLEGATIONS BY RESPONSIBILITY

ALLEG #	CHARACTERIZATION	SOURCE	RESP
1248	DUE TO THE INTENSE PRESSURE AT THE SITE THERE WASN'T ANYTIME TO LOOK UP THE WELD SYMBOLS IN REFERENCE DOCUMENTS THE INSPECTORS HAD TO GUESS WHEN THEY FOUND AN UNFAMILIAR SYMBOL	6/21/84GAP #104	RV-P
1249	PG&E MADE THE FALSE STATEMENT THAT REFERENCE DOCUMENTS WERE COMMONLY AVAILABLE AS READY REFERENCES RESEARCH MATERIALS WERE NOT READILY AVAILABLE	6/21/84GAP #105	RV-P
1250	PG&E STATEMENT IS MISLEADING THAT THE VAST MAJORITY OF PIPE SUPPORT/ RUPTURE RESTRAINT WORK IS COVERED BY SIX SYMBOLS. THERE ARE HUNDREDS OF VARIATIONS OF WELDING SYMBOLS	6/21/84GAP #106	RV-P
1257	PG&E RESPONSE LETTER TO GAP ALLEGATION #143 THAT RELEVANT SUPERVISORS ARE NOT AWARE OF ORDERS TO STOP WORKING ON WELD SYMBOL PROBLEMS IS FALSE. I WAS ORDERED TO STOP WORKING ON THIS	6/21/84GAP #113	RV-P
1265	PG&E CLAIM THAT REINSPECTIONS ARE PERFORMED WHEN INCOMPLETE WELD DESCRIPTIONS ARE IDENTIFIED IS FALSE. I IDENTIFIED MANY CASES OF GROSS DEFICIENCIES AND NO CORRECTIVE ACTION WAS TAKEN	6/21/84GAP #121	RV-P
1275	BOTH THE NRC STAFF AND PG&E'S THEORIES MAY BE INACCURATE ABOUT HOW P&ID'S AND OVID'S ARE USED. UNIT 2 HYDROSTATIC TEST PACKAGES HAVE BEEN ISSUED WITH OVID'S INSTEAD OF P&ID'S AND THEY WERE INACCURATE	6/21/84GAP #131	RV-P
1276	IN UNIT 2 HYDROSTATIC TEST PACKAGES I REVIEWED OVER 60% CONTAIN UNACCEPTABLE ERRORS. THESE ERRORS VIOLATE ANSI B31.7. THESE ERRORS MAY BE IN UNIT 1 ALSO.	6/21/84GAP #132	RV-P
1281	MANY DA REPORTS NEVER MADE IT INTO THE FORMAL DA REPORTING SYSTEM. I COULD REJECT WORK BUT COULDN'T INITIATE QUALITY REPORTS	6/21/84GAP #153	RV-P
1282	DCN'S OR OTHER REPORTS WERE OFTEN DISPOSITIONED WITHOUT ENSURING THAT THE CAUSE OF THE VIOLATION WAS IDENTIFIED AND CORRECTED	6/21/84GAP #154	RV-P
1283	QUALITY REPORTING SYSTEM DID NOT PROVIDE FOR IDENTIFYING THE FULL EXTENT OF DEFICIENCIES. NOR WAS THERE ANY USEFUL EFFORT TO TREAT IDENTIFIED PROBLEMS	6/21/84GAP #155	RV-P
1284	UNEXPLAINED DOCUMENT ALTERATIONS AND WELDS MADE OUT OF PROCEDURE WERE SIGNS OF DETERIORATING DA PERFORMANCE	6/21/84GAP #156	RV-P
1285	MANAGEMENT DILUTED THE DC PROGRAM TO KEEP PACE WITH THE DETERIORATING QUALITY OF CONSTRUCTION	6/21/84GAP #157	RV-P
1286	MANAGEMENT SPLIT UP THE DC INSPECTION TEAMS TO SHORTEN THE REVIEW TIME RESULTING IN A DECREASE IN THE QUALITY OF REVIEWS	6/21/84GAP #158	RV-P
1289	DC - 1 WAS REDUCED BY 80% TO SOLVE THE BACKLOG	6/21/84GAP #161	RV-P
1290	PROCEDURE CHANGES WERE ACCOMPLISHED IN AN UNCONTROLLED FASHION THROUGH MEMORANDA	6/21/84GAP #162	RV-P

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DIABLO CANYON ALLEGATIONS BY RESPONSIBILITY

ALLEG #	CHARACTERIZATION	SOURCE	RESP
1293	PULLMAN WAS DRILLING HOLES WITHOUT APPROVE-FOR-CONSTRUCTION DRAWINGS. WHEN A REINFORCEMENT BAR IS HIT, ONLY A VERBAL OR BY OUTLET FIX IS NECESSARY TO CONTINUE WHICH CONFLICTS WITH ESD 223.	6/21/84GAP #165	RV-P
1294	INFORMAL INSTRUCTIONS OMITTED QC DOCUMENTATION CONTROLS CONTAINED IN THE PROCEDURES, WHICH THEN WERE SKIPPED IN PRACTICE.	6/21/84GAP #166	RV-P
1295	LOST PROCESS SHEETS RESULTED WHEN PROCEDURES WERE VIOLATED AND THE QC REPORTING SYSTEM WAS SUPPRESSED	6/21/84GAP #167	RV-P
1296	I WAS TOLD BY MANAGEMENT TO APPROVE A PULLMAN REQUEST FOR AUTHORIZATION TO ADD HANGERS TO THE EXCEPTION LIST EVEN THOUGH THE PROCESS SHEET WAS LOST.	6/21/84GAP #168	RV-P
1299	'SD'S WEREN'T ENFORCED BECAUSE EVEN SUPERVISORY PERSONNEL DID NOT KNOW WHAT WAS IN THEM	6/21/84GAP #171	RV-P
1301	'SD 223 CONFLICTED WITH ESD 264 WHICH REQUIRES THAT WELD SIZE COMPLY WITH DRAWINGS. ESD 223 DIRECTS THAT OVERWELDING BE IGNORED AND NOT CHANGED ON THE AS-BUILT	6/21/84GAP#173	RV-P
1304	AN ESD CHANGE RESTRICTED INSPECTORS FROM WRITING REPORTS ON POOR WELDING IN EXISTING WORK. DEFECTS WERE PUSHED BACK TO THE AS-BUILT REVIEW. PGM'S CLAIM THAT ALL WORK WAS COVERED BY QA IS FALSE.	6/21/84GAP#176	RV-P
1305	PROCEDURE WAS BEING CHANGED BY A MEMORANDUM ONLY DISTRIBUTED TO MANAGEMENT	6/21/84GAP #17	RV-P
1306	1/24/84 MEMORANDUM CHANGES ESD 223 WHICH IS A QA VIOLATION	6/21/84GAP #178	RV-P
1307	4/11/83 MEMORANDUM CHANGES ESD 223 WHICH IS A QA VIOLATION	6/21/84GAP #179	RV-P
1308	1/24/84 MEMO TERMINATED THE DISPOSITION OF A PROCEDURE THRU DR 467B WHICH HAD SUPERCEDED THE ESD PROCEDURES. IT IS IMPROPER TO AMEND A PROCEDURE THRU A DR DISPOSITION	6/21/84GAP #180	RV-P
1309	1/24/84 MEMO TERMINATED THE DISPOSITION OF A PROCEDURE THRU DR 4870 WHICH HAD SUPERCEDED THE ESD PROCEDURES. IT IS IMPROPER TO AMEND A PROCEDURE THRU A DR DISPOSITION	6/21/84GAP#181	RV-P
1310	GUIDELINES OF 1/24/84 AND 2/15/84 PREVENTED QC REPORTS ON EXISTING WORK WHICH WAS DEFINED AS ANYTHING BEFORE 10/82	6/21/84GAP#182	RV-P
1311	SHIMS AND HANGERS THAT HAD SEAM WELDS OF NO STRUCTURAL VALUE WERE BOUGHT OFF BECAUSE THEY WERE ON "OLD WORK"	6/21/84GAP#183	RV-P
1312	WE COULD NOT RELIABLY DETERMINE WHETHER WORK WAS "OLD" OR "NEW" BECAUSE PULLMAN'S RECORDS CONFLICTED OVER WHAT HAD OR HAD NOT BEEN ACCEPTED BY 10/82	6/21/84GAP#184	RV-P
1313	THE 1/24/84 AND 2/15/84 POLICY WAS USED TO BLOCK HARDWARE PROBLEMS FROM BEING REPLIED ONTO THE AS-BUILT DRAWINGS	6/21/84GAP#185	RV-P

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DIABLO CANYON ALLEGATIONS BY RESPONSIBILITY

ALLEG #	CHARACTERIZATION	SOURCE	RESP
1314	FREQUENT DEFICIENCIES ON DRAWINGS FROM INCONSISTENT AND INACCURATE WELD SYMBOLS. PG&E'S RESPONSE TO NRC THAT THIS WAS RESOLVED THRU IMPROVED TRAINING IS INACCURATE	6/21/84GAP#186	RV-P
1315	NEW REVISIONS OF DRAWINGS WERE SENT DIRECTLY TO THE FIELD BEFORE BEING PROCESSED AT DOCUMENT CONTROL	6/21/84GAP#187	RV-P
1317	MANAGEMENT WAS NOT INTERESTED IN RESOLVING PROBLEMS WE IDENTIFIED AND WHEN WE RAISED PROBLEMS TO SUPERVISORS THEY STOPPED THERE	6/21/84GAP#189	RV-P
1318	MANAGEMENT WAS IGNORANT OF THE CODES, E.G. APPENDIX B	6/21/84GAP#190	RV-P
1319	MEMORANDA GUIDING WORK CONFLICTED WITH ONE ANOTHER	6/21/84GAP#191	RV-P
1320	CONFLICTING ORGANIZATIONAL CHARTS CREATED AN UNCLEAR CHAIN OF COMMAND	6/21/84GAP#192	RV-P
1321	INFORMAL COMMUNICATIONS ALLOWED SIGNIFICANT MEMORANDA TO BYPASS THE DOCUMENT CONTROL CENTER	6/21/84GAP#193	RV-P
1322	MANAGEMENT REFUSED TO HELP RESOLVE THE PROBLEM OF CONFLICTING MEMORANDA	6/21/84GAP#194	RV-P
1324	UNDERSIZE WELDS FOUND ON PRE-INSPECTED, ACCEPTED WORK. MANAGEMENT INSTRUCTED ME NOT TO REINSPECT.	6/21/84GAP#196	RV-P
1333	NO ONE CHECKED FOR ADDITIONAL BAD BASEPLATES THAT I KNOW OF. MANY MORE BASEPLATES MAY HAVE THE SAME TORQUING DEFICIENCY.	6/21/84GAP#142	RV-P
1334	I PULLED A SHIM OUT FROM UNDER A BASEPLATE AND REPORTED IT TO PULLMAN. A GROUTING CREW CAME AND GROUTED THE SUPPORT WITHOUT THE SHIM IN PLACE. THE CREW SHOULD HAVE CHECKED THE SHIM FIRST.	6/21/84GAP#141	RV-P
1339	THE 9/6/83 MEMORANDUM CONCERNING VERIFICATION OF LINE NUMBERS WAS NOT IMPLEMENTED IN PRACTICE	6/21/84GAP#136	RV-P
1340	PG&E ISSUES CONFLICTING MEMORANDUM. 8/10/83 MEMO INSTRUCTED PULLMAN NOT TO REMOVE PIPE HANGER INSULATION WHEN 9/6/83 MEMO TOLD PULLMAN TO VERIFY LINE NUMBERS. NEITHER MEMO HAS A CONTROL NUMBER	6/21/84GAP#135	RV-P
1341	PG&E CHANGED DESIGN BY MEMORANDUM. LARGE PIPE SUPPORTS IN BOTH UNITS WERE DELETED WITH THE ONLY REFERENCE ON THE HANGER PACKAGE. IT WAS NEVER MARKED ON THE AS-BUILD DRAWINGS FOR REVIEW.	6/21/84GAP#134	RV-P
1342	FINAL VISUAL INSPECTION OF WELDS COULD NOT BE PERFORMED DUE TO WELDS BEING COVERED OVER WITH PAINT	6/21/84GAP#198	RV-P
1344	PIPE RUPTURE RESTRAINTS PROGRAM WAS AUDITED AGAINST WRONG CONTRACT SPECIFICATION	6/21/84GAP#200	RV-P
1346	ESD 203 ESTABLISHED DO POLICY THAT WAS NOT REVIEWED AND APPROVED BY CG&E DO BEFT BEFORE TO BE	6/21/84GAP#202	RV-P

DIARLO CANYON ALLEGATIONS BY RESPONSIBILITY

ALLEG #	CHARACTERIZATION	SOURCE	RESP
1347	SUBCONTRACTOR SUPPLIED HANGER ASSEMBLIES WERE NOT INSPECTED	6/21/84GAP#203	RV-P
1348	PIPE HANGER ASSEMBLIES FABRICATED ON SITE DID NOT RECEIVE ANY IN PROCESS OR FINAL INSPECTION	6/21/84GAP#204	FV-P
1349	NO IN PROCESS INSPECTION OF PIPE SUPPORT INSTALLATION	6/21/84GAP#205	RV-P
1350	INSPECTORS USED UNAPPROVED INSPECTION FORMS	6/21/84GAP#206	RV-P
1351	WELD DISCREPANCIES ON PIPE SUPPORTS NOT DOCUMENTED	6/21/84GAP#207	RV-P
1352	NO EXPLICIT ACCEPTANCE CRITERIA FOR PIPE SUPPORTS	6/21/84GAP#208	RV-P
1353	NO INSTRUCTIONS FOR RECORDING INSPECTIONS OR WHAT ACCEPTANCE CRITERIA TO USE FOR RUPTURE RESTRAINTS	6/21/84GAP#209	RV-P
1354	NO IN PROCESS INSPECTION OF RUPTURE RESTRAINTS WAS PERFORMED	6/21/84GAP#210	RV-P
1355	WELDERS NOT QUALIFIED TO WELD MATERIAL THICKNESS ON RUPTURE RESTRAINTS	6/21/84GAP#211	RV-P
1360	INADEQUATE CORRECTIVE ACTION TAKEN WITH REGARD TO NEED FOR EXPANDED PULLMAN AUDIT PROGRAM	6/21/84GAP#216	RV-P
1361	INADEQUATE CORRECTIVE ACTION TAKEN WITH REGARD TO DEFICIENT DA DOCUMENTATION FOR PIPE SUPPORTS AND RUPTURE RESTRAINTS	6/21/84GAP#217	RV-P
1362	BOSTON-BERGEN DA REQUIREMENTS BASED ON WRONG CONTRACT SPEC	6/21/84GAP#218	RV-P
1363	IN RESPONSE TO ALLEGATION P&E MADE FALSE STATEMENT REGARDING ALLEGERS FAILURE TO DOCUMENT HIS CONCERNS PRIOR TO MAKING ALLEGATION	6/21/84GAP#219	RV-P
1364	DC INSPECTORS INSTRUCTED BY MANAGEMENT NOT TO DOCUMENT DECREPANT CONDITIONS IN FORMAL REPORTS	6/21/84GAP#220	RV-P
1406	BAD WELDS ON STANCHIONS ATTACHED TO CLASS I LARGE-BORE COULD FAIL DURING A SEISMIC EVENT.	6/21/84JI	RV-P
1408	DC INSPECTORS RESTRICTED FROM IDENTIFYING DISCREPANCIES IN "OLD" WORK	6/21/84JI	RV-P
1409	THOUGH LINEAR INDICATIONS WERE FOUND ON A WIDE FLANGE BEAM THE INSPECTOR WAS NOT ALLOWED TO DOCUMENT THE DISCREPANCY BECAUSE OF CONTRACTOR JURISDICTIONAL BOUNDARIES.	6/21/84JI	RV-P

Attachment 2 to Letter

PARAPHRASING OF ALLEGATIONS CONTAINED IN
CONFIDENTIAL TRANSCRIPTS

NOTE: The statements contained in this paper sometimes are quotes from the transcripts. Some, but not all, grammatical errors have been corrected.

ALLEGATION NO.

CHARACTERIZATION

- 0753 HP Foley issued AWS stamps to inspectors who were not level II inspectors.
- 0758 Hangers #24-2 and/or #24-24R, welds on lug attachment are not as specified. Hangers are on recirc charging pump, CCW supply and return lines.
- 0759 Atkinson quality control was nonexistent at start, it was something that just sort of developed. Documents were revised as work proceeded, as something less than adequate information was found in original documents.
- 0772 Hold tags installed by Atkinson inspector were removed without proper authorization.
- 0774 (Atkinson) allegor found so many problems in a vault audit that he was given another work assignment, since he was generating a backlog of problems.
- 0775 (Atkinson) allegor vault audit findings were incomplete fuel inspection forms, check marks missing, initials missing, welder's names missing.
- 0776 (Atkinson) allegor vault audit found inspection reports missing visual inspection sign off of first (root) pass, 10% of the time.
- 0777 (Atkinson) allegor vault audit found only the welder name who completed the last stitch of the weld, on inspection report. Initial welder who started weld, was not identified on inspection report.
- 0778 (Atkinson) inspections on weld records in vault were documented "after the fact", from inspector's memory. Sometimes months later.
- 0781 Atkinson QC problems were handled informally, by memo from night shift to day shift. There was no formal feedback to night shift, no way to really report back.
- 0783 A former Atkinson inspector's inspection documents (on shear lug work) were rewritten, and another individual was sitting there signing the former inspector's initials on the re-documentation of old work. Inspection reports were being updated and expanded to current level of documentation standards.

- 0784 Atkinson documentation was rewritten and signatures transferred without procedures and adequate documentation to recreate/"clean up" early documents. Usually performed by the same inspector who signed the original report, if he was still on the job site.
- 0787 Atkinson inspections were back-fitted for work that was not fully documented right the first time. Sometime the flaws were in the missing inspection area. A visual inspection after it's finished is too late.
- 0792 Audit of drawings in Pullman, Kellogg and Atkinson, on keeping current revisions on file, revealed poor drawing control.
- 0795 Pullman work was not performed in accordance with ESD's. Having the specification, procedures, and the prints, and drawings does not guarantee that the emphasis was placed on all portions of the specification. There were whole areas of job involvement where particular portions of the specifications were just flatly ignored.
- 0800 In 1978 it was impossible for QC to get a welder recalled for retest on Atkinson work site. A welder The specifications said that the inspector could call for a retest, but in practice, it was impossible to get a retest on a welder suspected of being incapable of doing the job.
- 0801 Regarding Atkinson work in 1978, QC could not always reject work. There was a particular gusset plate up in the turbine building roof that was garbaged, the inspector, foreman and welders wanted to tear it off and install a new plate. The inspector rejected it and hung a red tag on it, which bounced. Atkinson production management spent three more days working on the subject plate before they gave up and replaced it. Six man days of work could have been saved, if original rejection of work was accepted.
- 0802 Atkinson QA/QC was not independent from production in 1978. The base level inspector could not get a reject to stick without production management giving final approval.
- 0803 Atkinson QA/QC inspector did not find out disposition of all Non Conformance Reports (NCR's). Sometimes an inspector who had written an NCR in 1978 would be shoved off onto another assignment, and his bosses would say "we will deal with this".

0805

In 1978 Atkinson had no in house system to report problems observed outside of QC inspector's assigned responsibility. If an Atkinson inspector perceived a problem on the work site and his boss said it was not a problem, there was not an established method for documenting the subject problem and submitting it into a system where somebody other than his boss could take a look at it, and decide if the problem needed to be repaired or addressed.

0811

Atkinson welders who performed work were not accurately documented on weld inspection forms (FE-1). The weld form had one of the lines for identification of the welder or welders performing the work. Many times a welder would perform part of a weld one day shift, another welder would pick it up the next shift or day, sometimes without knowing which welder had worked the weld before. Many times it would be a last minute effort to fill out the FE-1 form line on who did the welding, and remember identify all the welders who worked on the weld from shift to shift, day to day. Many times an inspector would find a weld almost done, and there would be no welder's name on the FE-1 form.

0812

In 1978 a defect (divot) in gusset plate (in turbine building on the center line of the roof in the lower cord) had been hold tagged. The Atkinson inspector's hold tag was removed twice by other Atkinson inspectors/personnel who did not inspect same area identified on tag as defective. When erection aids were pulled off the gusset plate, a $\frac{1}{4}$ inch deep (a third of the way through the plate) divot was left on the back side of the plate, big enough to stick your thumb in. Divot is probably still in plate today.

0813

Plant is built on underground stream bed where granite was predicted (turbine building, west side). There were three caissons in the turbine building west side tress going down 65 to 85 feet. They drilled these three four-foot diameter holes down that far. And they found that the base rock, or their bedrock, was not really the granite that it had tested out to be, was sandstone.

0814

Pullman-stainless electrodes came out to field in a rod oven, but it was not plugged in. Electrodes came to the field cold from the weld requisition area and were not required to be put in a rod oven and kept at a temperature that would prevent the moisture from entering the coating.

- 0817 Pullman power products welding engineer provided a false statement that the code does not have rejection criteria for porosity when welding with coated SS electrodes for shielded metal arc.
- 0818 Pullman power products mishandling of coated stainless steel electrodes could possibly contribute to intergranular stress corrosion cracking.
- 0822 Foley weld rod control does not give verification to welder that right amount of welding rod was turned in.
- 0823 Foley QC inspectors were performing inspections without being qualified Level I or Level II, sometimes after only being on the job one and a half weeks.
- 0838 Three caisson holes 65 to 85 feet deep, drilled in mid-1979, were drilled into sandstone vice granite that was supposed to be there. The caissons in the middle of the building, and the three caisson holes 65 to 85 feet deep were drilled down into a underground stream bed that was to be solid bedrock. Aligned with that, in the performance of duties on the turbine deck and above, alleger had occasion to observe the actions of a core drilling outfit that was drilling down through the turbine pedestals. He observed the core samples coming up. The so-called granite sub-base, or sub-rock, turned out to be sandstone. There were, in fact, veins of diesel oil from leaking tanks in this rock, evidencing the fractured nature of it.
- 0839 Anchoring bedrock for turbine is so fractured that there were veins of diesel oil from tanks leaking into rocks (see explanation for 0838).
- 0840 The bedrock that the plant is anchored to is not solid, when they tensioned the cables to pull the turbine pedestals down there were many instances of the cables pulling out of the rock and losing their tension. They had to go back and redrill and regrout those.
- 0841 Geologists did not do an adequate job of identifying the rock that the plant is built on and the fractured nature of it.

- 0842 The core driller had drilled through a 16,000 volt bus bar, and just missed killing their crew. They were lucky. They just happened not to be touching the equipment. It was a near disaster, and nearly killed the two operators of the concrete core driller. This was somewhere in the turbine pedestal area. A bus bar was going through the concrete, embedded.
- 0843 PG&E blueprints not verifiable with revisions they are so unchecked and uncontrolled that they do not know what they have out there. Drilling through the 16,000 volt bus bar came about because nobody knew that the bus bar was even there. Their plans, their blueprints, did not show it. And it just seems amazing that a company like PG&E can lose a 16,000 volt bus bar, electricity-making being their own business. And it just shows me that a problem with the blueprints not being verifiable, and the revisions that have taken place over the years, that had gone on so unchecked and uncontrolled that they do not know what they have out there. And it would be damn near impossible to verify anything off the plans, especially if it was encased in concrete. If you could not see it, you could not be assured that there was anything inside that.
- 0844 PG&E did not repair the bus bar after it was drilled into.
- 0849 There was no method to ensure that structure bolts used in the turbine building were not being reused in 1978/1979. The allegor stated that the improper reuse of A-490 material bolting was in the roof of the turbine building.
- 0855 Atkinson welders taking their test sometimes took a week. The test should take only four hours in the test booth.
- 0856 Only 1% of the Atkinson welders taking the weld test failed. 15 to 20% would have been more realistic. The emphasis was getting the man on the payroll, and not what he could really perform in the actual field conditions. The test was a roadblock that did not stop many.

0857

When 35% of the stiffener plate welds failed, they were repaired using the same procedures that they were initially installed by. There would be a failure in some aspect of the weld, brought about by improper procedures. An example would be inattention to pre-heat on the massive sections of steel that were sometimes welded. Weld failures were more on the massive steel where the tensions could be developed inside the many layers of weld, and the shrinkage forces could accumulate enough to have a weld fail. We had a real massive involvement of weld failures on the column stiffener plates on the turbine building walls, the columns that hold up the roof and the crane rails. These columns had stiffener plates inserted on both sides of the column at intervals. I will say two to three foot intervals up the column. The program that I am mentioning is a go back and repair program, when it was detected that the stiffener plates were -- the welds were cracking from the ends of the welds working in. I think I could lay a percentage of those stiffener plates that we had fail in one way or another, due to the cracking problem, as about 35%. That kept us busy for another four months, repairing those. However, they were repaired to the same procedures and methods that were used to install them in the first place. Management had two optional methods to weld the stiffener plates in the columns. One method was single bevel partial penetration weld. The stiffener plates were three-quarter inch thick and welded to a three-quarter inch web of the column, and two-inch flanges on the column. The second method specified optionally in the drawings was a double fillet weld, a fillet weld on each side of the plate. The fillet weld option would be the most likely to succeed, for the reason that the opposed fillet welds would balance the stresses, and the welds required less volume of filler metal to be added. A quip the allegor heard from a welder assigned to the job, who thought that approach would lead to problems that would require a lot of expensive rework and repair -- I think that management chose the worst option in the interest of a little economic rape of PG&E.

0904

San Francisco design team attempted to cut off time for issuing drawing to the field by violating document control procedures without reporting the problem, which could cause work to occur without approved drawings. For example, around March 1984, San Francisco was issuing drawings down to the site and the drawings are supposed to come from San Francisco and go to document control up in the main building. But instead, they were coming from San Francisco, going to a member of the San Francisco design team who would send the drawings to the PTGC document control, and then the PTGC document control would run copies and send a copy out to the field and a copy to document control. Apparently what they were trying to do was cut off time for issuing the drawings to the field. The problem was, this practice was outside of procedure. This ties back in with the layout program, in that some of these drawings were issued out to the pre-inspection group, which sends the layout. There were ten drawings that San Francisco decided, for some reason, not to issue the layout. They were calling those ten layouts back, but these ten layouts had already made it to the field. They were already drilling holes in the concrete, without an approved for construction drawing, a drawing that would never be issued.

0906

Alleger was told not to do research as to the conflict between two red-line memos. Also told to drop the subject of drilling anchor bolt holes allegedly against a procedure. The allegor feels intimidated to the effect that if he does any followup of any concerns, in this case red-line memos, not in his normal duties, he will be fired. The allegor feels that he would be demoted to a lessor job in the least. A similar happening was when the allegor brought to his supervisor a concern regarding pre-inspection group drilling anchor bolt holes. The allegor felt the common practice of sending the package to the craft who would then drill the holes was against the procedure. The supervisor told him to drop it.

- 0907 Pre-inspection started receiving a backlog during hanger inspection. There was one phase of the program where the hanger would be inspected and the engineers would review the procedure. After that someone else reviewed the package. When the backlog started, the checking portion of the procedure was eliminated.
- 0908 A procedure said to verify all groove welds. Pullman was not doing this. Possibly ESD 253 or 263. Another procedure said to explain cross-outs on the back of the process sheets. Employees were instructed to ignore this. Possibly ESD 253 or 263.
- 0909 Employees were instructed not to reject hangers for specific reasons. One specifically stated in the allegation that he was to not reject hangers which had welds that were supposedly made to code 7/8, but were not covered in that procedure.
- 0911 Allegor had a safety concern that pre-inspection engineers did not know how to use fillet weld gauges. They were mostly design engineers with no field experience out there measuring welds.
- 0915 A QC inspector found hold points violated while performing an in process inspection of the weld inspection sheet. He was not allowed to hang hold tags when the problem was found. He was instructed not to document a hold point that had been violated. It was stated that this normally occurs when a following shift picks up the previous shift's paperwork.
- 0916 Foley QA/QC department was subjected to production pressure. Use of red tags was frowned upon because of production delays they caused.
- 0917 Quality Engineering set up their own entity to hang red tags. QA/QC people had to phone in their discrepancy, and receive a number for the tag. Then they had to wait until an engineer would come out and verify the discrepancy. The allegor further states that production personnel had to inspect the work before calling QC. Red tags were a detriment to production foreman. After five red tags, a foreman was busted back to crew.

- 0918 No NCR's were generated when cuts were made in between spot welds holding unistrut together. Two U-shaped pieces back to back are spot welded together, four inches on center, there is the potential for cutting a piece four inches or shorter where the only thing holding the pieces together is the galvanized dip. It was determined that the problem had been found approximately two years ago. No NCR's were generated.
- 0919 There was no heat number log or documentation of heat numbers until recently. The heat number log that was finally supplied had numerous gaps on the numbering system. Because of this, material traceability was lost. When the inspectors would cross reference the heat numbers, different materials for the same heat number would be specified.
- 0925 The rubber blocks, stoppers for the cranes, say "Made in Japan" right on them.
- 0927 The procedures provided to inspectors did not have all the current Procedure Change Notices (PCN's). There was not enough copies of the procedures available for all to use.
- 0928 Pullman inspector was told to inspect only Pullman work. The allegor observed vendor welds that would be unacceptable under any code. His supervisor said that was not within his scope because it was the work of another company and the allegor's inspections should only be for Pullman's work.
- 0931 As stated in characterization
- 0932 PG&E contract spec. 8711, Section 1, Paragraph 7.10.1 states that all gas tungsten arc welding machines are required to have high frequency for arc-starting capabilities, and a current control rheostat. This is not present on the welding machines. The FSAR states that all contract specifications will be fulfilled. Since the contract spec was not met, the FSAR was not followed, which in the allegor's mind is a Part 21 reportable occurrence.

- 0933 ESD 243 had no rejection criteria for bolts. An employee came upon a situation where there were bolting defects, and he needed to reject them. There was no Pullman criteria to reject the bolts, so the employee attempted to find that criteria. Because he was allowed to only use Pullman procedures, the employee did not have the latitude to fulfill his job as an inspector, which requires evaluation of a component's ability to meet quality objectives.
- 0934 Duplicate of 0933
- 0937 As stated in characterization.
- 0938 As stated in characterization.
- 0939 It is the allegor's knowledge that when you read a radiograph all indications should be noted, whether they are rejectable or not; porosity, scratches on the film, drop throughs, etc. Two particular examiners had a habit of not including all the discrepancies on the radiographic check sheet.
- 0942 Most welding inspectors did not have adequate schooling or training to be inspectors. Some only had experience as weld rod clerks. Most of them were in school going for their degrees. They were all certified Level II.
- 0944 There were no written procedures on how an inspector was to conduct his surveillance of welders in the weld test booth.
- 0945 The allegor states that when a hanger is attached to a concrete wall, holes are drilled to insert Hilti or Phillipps bolts. The procedure is to drive them into the wall and torque them without the plate. When they set up they are supposed to be 1/8" from the surface. You can verify a true torque reading because the bolt shield is not against the plate. If it is against the plate, you get a false torque reading.
- 0946 An inspector found numerous cases where the shield if the Hilti Bolt was against the plate. This was found when inspecting the pipe support. He attempted to write DCN's but was told not to look at old work.

- 0949 Regarding the preparation for NDE, slag deposits were overlooked. Besides being visually unacceptable, it could mask possible defects underneath the slag deposit. Also, paint was not properly removed.
- 0950 This is one specific, however inspector had problems with paint removal everyday.
- 0952 No specifics given.
- 0953 In a series of memos it is implied that 80 welds are to be accepted by reviewing results in the AC mode, although three had failed.
- 0954 PG&E letter DCL-84-082 states; "The NRC identified a number of welding inspectors who, prior to documentation of their qualifications, had apparently performed acceptance inspections. These inspectors did not perform NDE, but only performed fit-up and visual weld inspections". "...Reviews performed to this date indicate procedure (ESD-237) was fully implemented by June 1974".
- PG&E letter DCL-84-115 states "After October 3, 1975, no inspectors were found to have performed inspection prior to documentation of qualification per ESD-237".
- 0955 Same as 0954 - also, alleger states two names of individuals discussed in the letters. Alleger request reviews of two more individuals.
- 0969 PG&E issued a memo not to inspect shop welds. At one occasion an employee found a bad shop weld adjacent to a field weld by using MT examination. The engineer referred to the memo and instructed the inspector to accept the weld.
- Also in the case of Bostrom-Bergen, there was friction with the craft because they were required to follow procedures when welding next to a shop weld that was in their mind defective.
- 0971 Quality manager's attitude was although an employee found the problem on Tuesday, the general foreman who inspects the areas on Friday will find it then.
- 0977 The DER specialists made out reports on the defects which would get back to Pullman for correction. Pullman then would instruct the MT technicians to reshoot the bad areas to get the powder sticking so the repair people could have something to work with.

0981 No specifics given.

0982 Duplicate of 0875

0986 Duplicate of 0867

0987 Also the inspector was not notified of the requirements of the NCR.

0989 Duplicate of 0470

0994 As stated - also the weld did not fit the stitch spacing and length specification, much less have an acceptable quality for AWS configuration.

0995 Name of inspector is stated.

0998 Duplicate of 0775

1007 Duplicate of 0759

1008 PG&E claimed they audited all control documents in January 1983. The control documents that the allegor had at that time were out of date. The audit might have been done at the home office, but not at the site.

1009 As stated regarding design review engineers.

1026 Inspectors were buying off oversized welds. An audit of DCN's and DR's would show examples of bought off substandard work. QC engineer walkdowns were to pick up the stuff that was missed because inspectors felt "Fill in the blanks; as long as the paperwork looks good, let's go with it".

1035 Regarding design review packages. The box corresponds to a statement that the SSAR (sic) was affected. The "no" box was the box in question.

1036 See 1035

1055 As stated in characterization.

1061 Two employees feared they would lose their jobs if they wrote up a deficient condition notice. They were concerned with a beam clamp that have been moved after the ZRC paint was applied. They were concerned because Foley, PG&E, and the NCR had bought off the work.

1090 Duplicate of 0823.

1117 As stated. No specifics given.

0981 No specifics given.

0982 Duplicate of 0875

0986 Duplicate of 0867

0987 Also the inspector was not notified of the requirements of the NCR.

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