



NUCLEAR REGULATORY COMMISSION
OFFICE OF INVESTIGATIONS FIELD OFFICE REGION IV
811 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TEXAS 76011

REPORT OF INQUIRY

October 18, 1983

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION:
RECEIPT OF INFORMATION CONCERNING
DEFICIENCIES IN CPSES COATINGS PROGRAM

REPORT NUMBER: Q4-83-026

1. On September 12, 1983, William A. Dunham, former Protective Coatings Quality Control Lead Inspector, Brown & Root, Inc. (B&R), Comanche Peak Steam Electric Station (CPSES), was interviewed by NRC Investigator D. D. Driskill at Cleburne, Texas. During the interview, Dunham provided a copy a "Departmental Correspondence" memorandum, Exhibit (1), prepared by a O. B. Cannon and Sons employee, subsequent to their evaluation of the CPSES protective coatings program. Dunham stated the copy of this memorandum was surreptitiously obtained by a co-worker (not identified) at CPSES.
2. A review of Exhibit (1) by reporting investigator disclosed that Joseph J. Lipinsky, Quality Assurance Director for O. B. Cannon and Sons, had visited CPSES from about July 26-28, 1983. The memorandum was found to contain information which indicates a variety of problems exist in the CPSES coatings program. The problem areas specifically identified in the memorandum were "problems in areas of material storage, workmanship, not satisfying ANSI requirements, and possibly, coatings integrity." Lipinsky additionally reported his impression that a parallel exists between Comanche Peak and Zimmer with respect to the above mentioned problem areas. Lipinsky further reported problems in "documentation and traceability that falls short in adequately satisfying these requirements." Additionally noted in the memorandum was that Lipinsky reportedly told Ron Tolson, the CPSES Site QA Manager, that all these areas could affect NRC licensing, to which Tolson replied, "That's not my job or concern."

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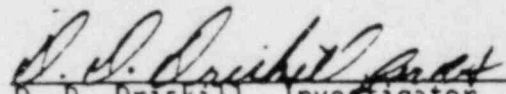
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8. This report is provided to the NRC Region IV management for review, evaluation and any action deemed appropriate.

Exhibits

(1) - Memorandum from J. J. Lipinsky 8-08-83


D. D. Driskill, Investigator
OI Field Office, Region IV

APPROVED BY:


R. K. Herr, Director
OI Field Office, Region IV

cc: W. J. Ward, OI:HQ w/attachments
E. G. Gilbert, OI:HQ w/attachments
J. T. Collins, OI:RIV w/attachments
T. F. Westerman, OI:RIV w/o attachments

DEPARTMENTAL CORRESPONDENCE

DA0-83-0096
August 8, 1983

TO: R. B. Roth cc: J. J. Norris
FROM: J. J. Lipinsky

SUBJECT: Trip Report OBC Job No. HB301 (Comanche Peak Unit 1-Glen Rose, TX)

The writer was on the subject site July 26, 27, and 28, 1983.

The following individuals were met while on site:

M. R. McBay (TUSI) Engineering Manager
C. T. Brandt (EBASCO) Project Non-ASME QC Supervisor
Gene Crane (TUSI) Construction Resident Manager
Jerry Hoops (EBASCO) Personnel
John Merritt (TUGCO) Manager of Start-Up
T. L. Miller (EBASCO) Paint Inspector
R. Tolson (TUGCO) QA Manager
Mark Wells (Gibbs & Hill) Engineer
Harry Williams (Gibbs & Hill) QC Paint Supervisor

The following activities were performed while on site:

July 26, 1983 - Meet C. T. Brandt (Ebasco)
- Walk site with Harry Williams (Gibbs & Hill)
- Meet R. Posgay (OBC) - discuss painter qualifications and site conditions/problems in general
- Meet Mark Wells (Gibbs and Hill)
- Get Badged

July 27, 1983 - Walk around site - observe work on polar crane and dome
- Brief meeting with R. Tolson (TUGCO) and C. T. Brandt (Ebasco) - preliminary assessment by J.J.L. that Comanche Peak has problems in areas of material storage, workmanship (quality of work and painter qualification & indoctrination), not satisfying ANSI requirements and possibly coating integrity. All of above could affect NRC licensing to which R. Tolson replied "That's not my job or concern".

Also discussed former OBC employees with emphasis on T. L. Miller (Ebasco). R. Tolson (TUGCO) asked J.J.L. if J.J.L. would rehire T. L. Miller (Ebasco). J.J.L. replied "Depending on circumstances, yes". C. T. Brandt (Ebasco) volunteered to have T. L. Miller (Ebasco) at the airport by three o'clock.

EXHIBIT (1)

- July 27, 1983 - Go through project specifications
- Meet with swing shift inspection personnel
- Observe swing shift work on polar crane and dome
- July 28, 1983 - Meet JJN and give run down on observations and potential problem areas
- Meet with Mark Wells (Gibbs and Hill) and go over specification 2323AS31 and FSAR commitments to ANSI Standards. ANSI N5.12, 101.2, 101.4 (which ties into N45.2) and Regulatory Guide 1.54 are referenced in either the specification or FSAR.
- Advise JJN on specification/FSAR commitments
-Meeting with J. Merritt (TUGCO), G. Crane (TUSI) R. Tolson (TUGCO), M. McBay (TUSI), JJN, JJJ
- A) JJN gave introduction which included the fact that the Comanche Peak site is committed to ANSI requirements and JJN then attempted to turn over discussion to JJJ.
- B) JJJ started by stating that based on observations and specification/ANSI commitments that there are areas for people to be concerned about at Comanche Peak.
- JJJ briefly reviewed for the individuals present that OBC has had extensive experience on nuclear projects, and that OBC is familiar with various means/methods of satisfying ANSI requirements.
- R. Tolson (TUGCO) asked for examples of specific problem areas or items.
- JJJ replied that specifics cannot be given without a thorough review/audit. However, described problems with material storage, painter qualification/indoctrination, possible documentation deficiencies, and morale problems.
- C) JJJ indicated that by Brown and Root estimates, only 34 out of 452 individuals are of any value as painters. JJJ also stated that if quality work is put in place then they would be a long way to resolving site problems. Further JJJ stated that there is currently a "No Win" situation on site between the craft and QC Inspectors, and even though this sounds corny, Brown and Root needs to develop a "Win-Win" situation.

Conversation at this point took off on the areas of assuring that individuals putting work in place are doing an adequate job or get disciplined, and changing morale.

- D) Discussion then centered on what if any changes OBC would recommend for the specification. Essentially Brown & Root is happy with the level of enforcement/inspection currently in force for the specification/procedure requirements. Also a change in the specification this late in the game would only confuse matters on site. JJN to come up with a DCA for touch-up.
- E) Problems with the quality of the air supply (takes up to half of the shift to have the oil problem corrected) were discussed and how to correct same.
- F) Availability and qualification of inspection personnel was discussed. JJN suggested that J. Coogan (BEI) may have some people available. J. Merritt (TUGCO) suggested J. Coogan contact Jerry Hoops (Ebasco).

-Meeting with J. Church (TUGCO-VP) J. Merritt (TUGCO)
JJN, JJJ

- A) J. Merritt (TUGCO) reviewed/summarized discussion of earlier meeting.
- B) J. Merritt (TUGCO) directed JJN/OBC to do no more (other than recommend alternative air supply) until notified by TUGCO.

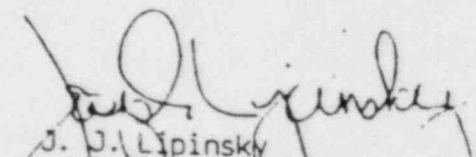
The following are the writers observations/opinions as a result of this site visit:

- A) To some extent a parallel can be drawn with Comanche Peak and Zimmer. Comanche Peak is doing inspections to the degree that they (Comanche Peak) are comfortable with or will tolerate. However in the real world there are requirements that have to be satisfied, and in at least the areas of material storage, painter qualification/indoctrination, documentation and traceability indications are that Comanche Peak falls short in adequately satisfying these requirements. The writer's opinion is that management at Comanche Peak has deluded itself into thinking everything is alright or it will all come out in the wash. The fact that management attempts to squash any efforts to point out quality problems (No NCR;s, QC reporting to production, etc.) to some extent confirms the above, and has led to a morale problem with the inspection staff.

- B) Almost everyone in the inspection staff is looking to get out of Comanche Peak. The inspection staff works 60-70 hours a week. You can't work people on an extended basis even with high salaries (apparently only a few stay a whole year). In addition to the long hours the inspectors contacted by the writer (other disciplines included) all have a low opinion of the quality of the work put in place, and in effect are keeping quiet until they can find another job.
- C) The writer did not feel comfortable with the way JJN presented the ANSI requirements. This has been discussed with JJN, and to a certain extent the writer feels that at the least the manner of presentation was counter productive to Cannon's efforts. The writer would like to state for the record that OBC does satisfy all applicable ANSI requirements and has done so on numerous nuclear projects.
- D) JJN and JNL discussed the possibility of OBC performing an in-depth audit. The writer cannot recommend an audit at this time because B&R is hostile to the idea and no action would be taken by B&R on problems/concerns detected during the audit.
- E) High DFT of CZ#11 is power ground to acceptable DFT. This would burnish or polish the zinc, and possibly result in poor adhesion of the top coat.
- F) Old Phenoline 305 (between 1-2 years old) is being topcoated with new Phenoline 305 with little or no surface preparation (solvent wipe).

SUMMARY:

- 1) This trip was not as productive as the writer had hoped. Often the writer felt that B&R wanted to buy the "right" answer. This is substantiated to some extent by the fact that they did not try to utilize the expertise and/or experience of the writer with regard to Quality Assurance/Quality Control, and the attitude of the B&R management (especially Quality Assurance).
- 2) If OBC tries to obtain a contract on this site, the writer would suggest that it be a rework contract because it will be impossible (by all indications) to salvage what work is currently in place.


J. J. Lipinsky
Quality Assurance Director