



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

DATE: July 11, 1984

REPORT OF INVESTIGATION

TITLE: COMANCHE PEAK STEAM ELECTRIC STATION:
ALLEGED FALSIFICATION OF QUALITY CONTROL RECORDS

SUPPLEMENTAL NO. DN 50-445/50-446

CASE NUMBER: 4-83-006

CONTROL OFFICE: OI FIELD OFFICE: REGION IV STATUS: CLOSED

PERIOD OF INVESTIGATION: March 8, 1983 - May 10, 1984

REPORTING INVESTIGATOR:

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Donald L. Driskill, Investigator
Office of Investigations Field Office, Region IV

REVIEWED BY:

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SUMMARY

Investigation was initiated subsequent to the interview of a concerned individual (allegor) who related that a Brown & Root, Inc. (B&R) employee at Comanche Peak Steam Electric Station (CPSES) made statements that he (the B&R employee) had forged the signature of a former quality control (QC) inspector on CPSES records. The allegor stated he was acquainted with the former QC inspector and is aware that he (the inspector) initiated (and presumably signed) one nonconformance report (NCR) which was a controversial issue during past Atomic Safety and Licensing Board hearings relative to CPSES. The allegor stated his concern was that the B&R employee, if truthful, may have been involved in an effort to alter records relating to the aforementioned NCR.

The NCR described by the allegor was obtained from NRC records. Examination of the NCR disclosed that the NCR was signed by a different QC inspector than indicated by the allegor.

An interview of the former QC inspector (identified by the allegor) who identified the nonconforming condition addressed by the NCR was conducted. The former QC inspector reviewed the NCR and stated it was the same NCR he had caused to be submitted. This former QC inspector pointed out that he did not actually sign the NCR. He explained that although he and a co-worker identified the nonconforming condition, the co-worker actually signed the NCR. The former QC inspector stated he is satisfied with the corrective action taken on the nonconforming condition reported on this NCR.

A review of the NCR package at CPSES disclosed the original NCR, signed by the co-worker, had been revised three times; however, the revisions did not involve changes of the description of the nonconforming condition, only changes relative to the corrective action taken.

An interview of the former CPSES Quality Assurance supervisor disclosed that final corrective action to the NCR for the nonconforming condition was completed and approved in early 1979, and that no other revisions were made to

the NCR after that time. He also stated the NCR in question was thoroughly examined before the Atomic Safety and Licensing Board in early 1981 and no problems were found.

The investigation disclosed no evidence of forged signatures.

DETAILS

Purpose of Investigation

The purpose of this investigation was to determine whether documentation relative to cracks discovered in the concrete base mat of Reactor Containment Building I at Comanche Peak Steam Electric Station was altered, falsified, or contained forged signatures.

Background

On March 8, 1983, the NRC Region IV received a telephone call from an individual requesting anonymity, who claimed he had information relating to possible falsified civil quality control records at CPSES. The individual provided a [REDACTED] Texas, telephone number where he could be contacted by an NRC investigator.

On March 16, 1983, telephonic contact was effected with the allegor and subsequent to his receipt of assurance that confidentiality would be afforded, the individual agreed to meet with reporting investigator on March 17, 1983, at the [REDACTED] Texas.

Other Investigative Aspects

During May 1983, A. B. BEACH, Senior Reactor Engineer, Division of Quality Assurance, Safeguards and Inspection Programs, NRC, was interviewed concerning his knowledge of the cracks in the reactor base mat, Unit I, CPSES. BEACH stated that during his February-March 1983 Construction Appraisal Team Inspection at CPSES, he had obtained copies of the NCR's relative to the cracks which he agreed to provide to reporting investigator. BEACH stated he had no knowledge concerning the cracks, other than the information contained in the NCR's.

During May 1983, Joe I. TAPIA, Reactor Inspector, Reactor Projects Engineering Program Section, Region IV, NRC, was interviewed concerning the cracks in the CPSES Unit I reactor base mat. TAPIA stated he has reviewed all CPSES documentation and corrective action concerning this matter, and found its resolution to be satisfactory. TAPIA agreed to assist in the interview of [REDACTED], supra, relative to this matter.

INVESTIGATOR'S NOTE: Information obtained from the allegor, NRC technical staff, publicity surrounding base mat cracks in Unit I CPSES, and interviews of other knowledgeable personnel indicates the NCR reviewed by reporting investigator is the one referred to by the allegor.

On June 9, 1983, telephonic contact with [REDACTED] disclosed that [REDACTED] is employed by [REDACTED] working on a [REDACTED] at a [REDACTED]. [REDACTED] is scheduled to come to Texas on [REDACTED] 1983.

Review of NCR [REDACTED] Record Package

On May 10, 1984, the NCR [REDACTED] record package was reviewed by NRC Investigator Donald D. DRISKILL at CPSES. Records disclosed that NCR [REDACTED], which was originally submitted on [REDACTED] [REDACTED], was revised on three occasions. Review of the revisions disclosed that changes made to the NCR, each time, related to "disposition" and not to the described "nonconforming condition." The original NCR, a copy of which is Exhibit (5), and each of the revisions were found to contain the exact location and description of the nonconforming condition as well as the "pour" number, contrary to what was stated by [REDACTED] [REDACTED], supra.

NCR [REDACTED], Revision No. 3 is appended herein as Exhibit (6).

As stated by [REDACTED], NCR [REDACTED] was written by another individual at his [REDACTED] direction. The review of this NCR package disclosed no evidence of forged signatures (as originally alleged) nor any changes to the descriptions of the nonconforming condition. The only changes made to the NCR in the revisions were relative to the proposed corrective action.

Interview of Ronald TOLSON

On May 10, 1984, Ronald G. TOLSON, an assistant to the Vice President and Project General Manager for TUGCO at CPSES was interviewed by NRC Investigator D. D. DRISKILL at CPSES.

TOLSON, when questioned concerning the brief revised copy of CPSES NCR [REDACTED] described by [REDACTED] supra (page 5), stated he had no knowledge of any revisions to that NCR aside from those contained in the NCR file package. TOLSON stated there were several revisions to NCR [REDACTED] which were made due to changes in the proposed corrective action for the nonconforming condition described on the NCR. TOLSON stated these revisions would not have required any change in the description of the nonconforming condition or deletions of data contained in that description.

TOLSON, subsequent to reviewing the NCR [REDACTED] package, pointed out that revision 3 to NCR [REDACTED] (the final revision) was dated [REDACTED] and that final verification of repair was dated [REDACTED]. He stated there would have been no reason for any alteration or revision of NCR [REDACTED] subsequent to that date.

TOLSON also stated that NCR [REDACTED] was thoroughly examined during testimony before the CPSES Atomic Safety and Licensing Board (ASLB) in April 1981. TOLSON stated that all documentation relative to NCR [REDACTED] and related to the corrective action taken were present as exhibits to that hearing. TOLSON stated that the resolution of NCR [REDACTED] was approved by both the NRC and ASLE at that time.

INVESTIGATOR'S NOTE: Due to [REDACTED] request for confidentiality, TOLSON was not specifically questioned regarding the document [REDACTED] described as being given to him, by TOLSON, in [REDACTED] 1981. Inasmuch as TOLSON's statements regarding NCR [REDACTED] and its revisions are substantiated by the NCR [REDACTED] documentation package, there appears to be no factual basis on which to substantiate [REDACTED] claim that another revision to NCR [REDACTED] was made in [REDACTED] 1981 more than [REDACTED] after the corrective action was accomplished and months after the issues were examined before the ASLB.

STATUS OF INVESTIGATION

This investigation is submitted as CLOSED since no evidence was developed to indicate any merit in the alleged's concerns.

INVESTIGATOR'S NOTE: Due to [REDACTED] (the alleged's) request for confidentiality and the personal nature of his [REDACTED] 1983 conversation with [REDACTED] no interview of [REDACTED] was conducted. This decision is also supported by the fact that [REDACTED] stated that the description of the nonconforming condition of NCR [REDACTED] has not been changed, and also the statement [REDACTED] made regarding [REDACTED] credibility (page 6 and Exhibit (4) pertain).

- (1) Confidentiality Agreement of [REDACTED]
- (2) Statement of [REDACTED]
- (3) Confidentiality Agreement of [REDACTED]
- (4) Results of Interview of [REDACTED]
- (5) CPSES NCR [REDACTED], Revision No. 0
- (6) CPSES NCR [REDACTED], Revision No. 3

[REDACTED]
[REDACTED]

EXHIBIT 1

EXHIBIT 2

EXHIBIT 3

EXHIBIT 5

EXHIBIT 6